

CENTRAL VILLAGE NEWCASTLE

PRIVACY POLICY

Effective date: 17 August 2026

1. Our commitment to privacy

Central Village Pty Ltd, trading as **Central Village Newcastle**, operates an over-55s residential land lease community in Mayfield, Newcastle NSW.

We are committed to protecting the privacy of residents, homeowners, prospective residents, purchasers, visitors and other people who deal with us.

We handle personal information in accordance with applicable laws, including:

- the *Privacy Act 1988 (Cth)* and Australian Privacy Principles;
- the *Health Records and Information Privacy Act 2002 (NSW)* where health information is collected;
- the *Residential (Land Lease) Communities Act 2013 (NSW)* and associated Regulation;
- the *Spam Act 2003 (Cth)*; and
- other applicable Commonwealth and NSW laws.

2. Information we collect

We only collect personal information that is reasonably necessary for our activities.

Depending on your dealings with Central Village, this may include:

- name, address, telephone number and email address;
- age or date-of-birth information where relevant to village eligibility;
- identification information where reasonably required;
- details about enquiries, inspections, purchases, sales and occupancy;
- site agreement, site fee and utility information;
- payment and account records;
- correspondence, maintenance requests, complaints and incident records;
- emergency contact details;
- health, mobility or accessibility information voluntarily provided where reasonably necessary;
- information provided by authorised representatives, solicitors, conveyancers or agents; and
- website information such as IP address, browser type, device information and website usage.

Where lawful and practicable, you may make a general enquiry anonymously or using a pseudonym. Identification may be required where necessary to administer a site agreement, transaction, account, legal obligation or emergency response.

3. How we collect information

We generally collect personal information directly from you when you:

- contact us;
- submit a website enquiry;
- request a brochure;
- arrange a tour or inspection;
- enquire about or purchase a home;
- enter into or administer a site agreement;
- make payments;
- request maintenance;
- make a complaint; or
- otherwise communicate with Central Village.

We may also lawfully receive information from an authorised representative, joint owner, family member, emergency contact, solicitor, conveyancer, real estate agent, contractor, government agency or other relevant source.

If we receive unsolicited information that we do not reasonably need and are not required to keep, we will take reasonable steps to destroy or de-identify it.

4. Why we collect and use information

We may collect, hold, use and disclose personal information to:

- respond to enquiries;
- provide brochures and information;
- arrange inspections and village tours;
- communicate about available homes;
- determine eligibility for residence where relevant;
- complete required homeowner disclosure processes;
- prepare and administer site agreements;
- manage home sales and purchases where Central Village is involved;
- administer site fees and utilities;
- maintain homeowner and resident records;
- provide maintenance and community services;
- manage safety, security and emergencies;
- manage complaints and disputes;
- meet legal and regulatory obligations;
- maintain financial and business records;
- improve our website and services; and
- send marketing communications where permitted by law.

We will not ordinarily use personal information for an unrelated purpose unless you consent, it is reasonably expected and permitted by law, or the use is otherwise required or authorised.

5. Disclosure of information

Central Village does not sell personal information.

We may disclose information where reasonably necessary to:

- employees and authorised representatives;
- solicitors, accountants and other professional advisers;
- IT, website, software and data-storage providers;
- payment and financial service providers;
- contractors and utility providers;
- real estate agents, solicitors and conveyancers involved in transactions;
- insurers;
- emergency services;
- NSW Fair Trading;
- NCAT;
- government agencies, regulators, courts or law-enforcement bodies; or
- another person where you have consented or disclosure is legally authorised.

6. Marketing communications

Where permitted by law, Central Village may send information about:

- available homes;
- inspections;
- open days;
- village information; and
- related services.

Where consent is required, we will obtain it before sending marketing material.

You may unsubscribe at any time using the unsubscribe function provided or by contacting us.

Withdrawing from marketing does not prevent Central Village from sending necessary administrative, contractual, legal, safety or service-related communications.

7. Health information

If you voluntarily provide health, mobility, accessibility or emergency information, we will only collect and use it where reasonably necessary and lawful.

We will take additional care to protect health information and will restrict its use and disclosure to appropriate purposes and authorised persons.

8. Security and retention

Central Village takes reasonable steps to protect personal information from:

- loss;
- misuse;
- interference;
- unauthorised access;
- modification; and
- disclosure.

Security measures may include password protection, access controls, secure storage, cybersecurity safeguards and secure disposal procedures.

We retain personal information only for as long as it is reasonably required for our business, legal, contractual or regulatory obligations.

When information is no longer required, we will take reasonable steps to securely destroy or de-identify it.

9. Data breaches

If Central Village becomes aware of a suspected privacy or data breach, we will investigate, contain and assess the incident.

Where required under the Notifiable Data Breaches scheme or another applicable law, affected persons and the relevant regulator will be notified.

10. Access and correction

You may request access to personal information we hold about you.

You may also ask us to correct information that is:

- inaccurate;
- incomplete;
- out of date;
- irrelevant; or
- misleading.

We may ask you to verify your identity before processing a request.

We will respond within a reasonable period and may refuse or restrict access only where permitted by law.

11. Website cookies and overseas services

Our website may use cookies, analytics and similar technology to:

- operate website functions;
- understand website use;
- improve performance; and
- measure marketing effectiveness.

Some technology, software, analytics or data-storage providers may store or process information outside Australia.

Where overseas disclosure occurs, Central Village will take reasonable steps required by applicable privacy law to protect personal information.

12. Photographs and testimonials

Where required, Central Village will obtain permission before using an identifiable person's photograph, testimonial or personal information for promotional purposes.

Consent may be withdrawn for future use by contacting Central Village, subject to material already lawfully published or distributed.

13. Land lease community records

As the operator of a residential land lease community, Central Village may collect and retain information required to administer:

- prospective homeowner disclosures;
- site agreements;
- site condition reports;
- site fees;
- utilities;
- home sales and transfers;
- homeowner communications;
- complaints and disputes; and
- NSW Fair Trading or NCAT requirements.

These records will be handled in accordance with applicable privacy and residential land lease community laws.

14. Privacy complaints

If you believe we have not handled your personal information appropriately, please contact us.

We will investigate privacy complaints and respond within a reasonable period.

Where applicable, you may also contact:

- the **Office of the Australian Information Commissioner**;
- the **Information and Privacy Commission NSW** for relevant health information matters; or
- **NSW Fair Trading** for matters concerning residential land lease community obligations.

15. Changes to this policy

We will review this Privacy Policy at least annually and when there are significant changes to:

- privacy legislation;
- residential land lease legislation;
- our website;
- technology systems;
- marketing processes; or
- our information-handling practices.

The current version will be published on the Central Village website.

16. Contact us

For privacy enquiries, access or correction requests, marketing opt-outs or complaints, contact:

Privacy Officer / Village Management
Central Village Management Pty Ltd
29 Arthur Street
Mayfield NSW 2304

Phone: 02 4062 0582

Email: admin@centralvillagenewcastle.com.au