

# Privacy Policy

## 1. Our commitment

XWISE CO Pty Ltd (ACN 680 749 642), its related entities and associated businesses (“XWEB GROUP”, “we”, “our” or “us”) are committed to protecting your privacy and managing your personal information responsibly.

This Privacy Policy explains how we collect, hold, use, disclose and manage personal information in accordance with the **Privacy Act 1988 (Cth)** and other applicable Australian privacy laws.

By providing personal information to us, using our website, submitting an enquiry, applying for a role, or otherwise interacting with us, you consent to us handling your personal information in accordance with this Privacy Policy.

## 2. What personal information we collect

The types of personal information we collect will depend on how you interact with us.

We may collect:

- your name, address, email address and phone number
- enquiry details, preferences, property interests or project interests
- information you provide through forms, website enquiries, registrations, surveys or promotions
- financial or transactional information where relevant to our dealings with you
- identity verification information where required
- employment application details, including work history, referee details and information provided during recruitment
- technical information such as IP address, device type, browser type, website usage data and cookie information
- any other information reasonably required to manage our relationship with you or provide our products and services

## 3. Sensitive information

We will only collect sensitive information where it is reasonably necessary and where you have consented, or where collection is required or authorised by law.

Sensitive information may include health information, accessibility requirements, or other information you choose to provide to us.

# Privacy Policy

## 4. How we collect personal information

We may collect personal information when you:

- contact or communicate with us by phone, email, online, in person or through social media
- submit an enquiry through our website or a third-party platform
- register your interest in a project, product or service
- participate in a survey, promotion or event
- apply for a job with us
- use our website or interact with our digital advertising

We may also collect personal information from third parties, including:

- marketing, advertising, data and research providers
- sales agents, project partners, consultants and service providers
- social media platforms and digital advertising platforms
- referees, recruiters or employment screening providers
- government, regulatory or law enforcement bodies where required

## 5. Why we collect, use and disclose personal information

We collect, use and disclose personal information to:

- respond to enquiries and provide information about our projects, products and services
- manage customer, supplier, partner and stakeholder relationships
- provide, market and improve our products and services
- personalise website and marketing experiences
- conduct research, reporting and analytics
- manage events, promotions and communications
- assess employment applications
- comply with legal, regulatory and contractual obligations
- manage risk, security, disputes and business operations

We may also use your information for related purposes that you would reasonably expect, or where required or permitted by law.

# Privacy Policy

## 6. Direct marketing

We may send you marketing communications about projects, products, services, offers, events or updates that may be relevant to you.

These communications may be sent by email, SMS, phone, post, social media or other digital channels.

You can opt out of marketing communications at any time by using the unsubscribe link in the communication or by contacting us directly.

Even if you opt out of marketing, we may still send you important service, transactional or legal communications where required.

## 7. Who we disclose personal information to

We may disclose personal information to:

- related entities and associated businesses
- sales agents, consultants, contractors and project partners
- marketing, advertising, analytics and technology providers
- website, hosting, CRM, database and cloud service providers
- professional advisers, including legal, accounting and insurance providers
- payment, finance or transaction service providers where relevant
- recruiters, referees or employment screening providers
- government, regulatory, law enforcement or dispute resolution bodies
- prospective purchasers, investors or advisers if part of our business or assets are sold or restructured

Where we disclose personal information to third parties acting on our behalf, we take reasonable steps to ensure they handle it in accordance with applicable privacy laws.

# Privacy Policy

## 8. Overseas disclosure of personal information

We may disclose personal information to overseas recipients, including related entities, technology providers, cloud hosting providers, data storage providers, marketing platforms and service providers who assist us in operating our business.

These recipients may be located in countries including:

- Australia
- New Zealand
- United States
- Canada
- United Kingdom
- Singapore
- Japan
- Philippines
- India

We take reasonable steps to ensure overseas recipients use personal information only for the intended purpose and handle it in accordance with applicable privacy requirements.

## 9. Cookies, analytics and website technologies

Our website may use cookies, pixels, tags, analytics tools and similar technologies to collect information about how users interact with our website and digital advertising.

This may include:

- pages visited
- time spent on pages
- device and browser information
- IP address
- general location information
- referral source
- interactions with forms, links, downloads or advertising

We may use tools such as Google Analytics, Meta advertising technologies, conversion tracking, heat mapping, CRM tracking and other website analytics tools.

This information helps us improve our website, measure campaign performance, understand user behaviour and deliver more relevant advertising.

You can manage cookies through your browser settings. If you disable cookies, some website features may not function properly.

# Privacy Policy

## 10. Security of personal information

We take reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification or disclosure.

Personal information may be stored electronically or in hard copy. We use a range of physical, technical and administrative safeguards to protect the information we hold.

However, no method of transmission over the internet is completely secure. Email and online communications may not always be encrypted or secure.

Where required by law, we will notify affected individuals and relevant regulators of eligible data breaches.

## 11. Third-party websites

Our website may contain links to third-party websites or platforms.

We are not responsible for the privacy practices, content or security of those third-party websites. You should review their privacy policies before providing personal information.

## 12. Accessing, correcting or deleting your personal information

You may request access to the personal information we hold about you, or ask us to correct or delete it.

We may need to verify your identity before responding to your request.

In some circumstances, we may be unable to provide access, correction or deletion, including where:

- a legal exception applies
- access would impact another person's privacy
- information must be retained for legal, regulatory or business reasons
- the request is unreasonable, impractical or unlawful

If we refuse a request, we will provide reasons where it is lawful and reasonable to do so.

# Privacy Policy

## 13. Complaints and privacy concerns

If you have questions, concerns or complaints about how we handle your personal information, please contact us:

**Privacy Officer**

XWISE CO Pty Ltd

Email: [hello@xwisegroup.com.au](mailto:hello@xwisegroup.com.au)

Post: Level 8/5 Bowen Crescent, Melbourne VIC 3004

We will acknowledge your complaint and aim to respond within a reasonable timeframe.

If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner:

**Office of the Australian Information Commissioner**

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

Phone: 1300 363 992

Website: [oaic.gov.au](http://oaic.gov.au)

Post: GPO Box 5218, Sydney NSW 2001

## 14. Changes to this Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in law, technology, business operations or privacy practices.

The most current version will be available on our website.

**Effective date:** 20 May 2026