

CLARK Property Partners Pty Ltd

ABN 68 641 858 737

t/as CLARK Commercial | CLARK Prestige | and associated divisions

CPP-POL-07

Privacy & Data Protection Policy

Version 1.0 | June 2026 | Approved: Stephen Clark, Managing Director

Defined Term

CLARK Property Partners Pty Ltd (ABN 68 641 858 737) trading as CLARK Commercial, CLARK Prestige, and associated divisions and business names is referred to throughout this Policy as "**CPP**". All references to CPP in this document apply to the entire organisation including all trading divisions, business names, personnel, directors, contractors and agents acting on behalf of CPP.

Legislative Context

This Policy reflects CPP's obligations under the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs). CPP complies with all applicable privacy and data protection legislation in all its business activities.

01 Policy Statement

1. Policy Statement

CLARK Property Partners Pty Ltd (ABN 68 641 858 737) trading as CLARK Commercial, CLARK Prestige, and associated divisions and business names ("CPP") is committed to the responsible collection, use, storage and protection of personal information across all divisions. Personal information is handled with respect, used only for lawful purposes, and protected from misuse, interference and unauthorised access.

02 Collection of Personal Information

2. Collection of Personal Information

CPP collects personal information only where it is necessary for a legitimate business purpose across its divisions:

- Commercial sales and leasing — client contact details, financial capacity information, identity documents for transaction purposes
- Prestige residential — buyer, seller and tenant personal and financial information for sales, leasing and management purposes
- Property management — tenant contact details, lease documentation, financial records, insurance information and business details
- Hotels and hospitality — guest and operator information for tenancy and management purposes
- Marketing — contact details of property enquirers, tenants, event attendees and digital subscribers for marketing communications

CPP collects personal information directly from individuals wherever practicable. Where collection from third parties is necessary, individuals are notified.

03 Use & Disclosure

3. Use & Disclosure

Personal information collected by CPP is used only for the primary purpose for which it was collected. CPP will not disclose personal information to third parties except:

- Where required by law, court order or regulatory requirement
- With the express consent of the individual
- To clients in the performance of CPP's property management, leasing or sales obligations
- To legal advisers, accountants or other professional advisers engaged in connection with a specific matter
- To financial institutions, where required for settlement or transaction purposes
- To marketing platforms and communications services providers engaged by CPP — subject to data processing agreements

04 Data Security

4. Data Security

CPP takes all reasonable steps to protect personal information from misuse, loss and unauthorised access:

- All client, tenant and personal data stored in CPP's secure property management and financial management systems with role-based access controls
- Physical documents containing personal information stored securely and disposed of by secure destruction
- CPP personnel trained on privacy obligations and data handling responsibilities upon commencement and annually thereafter
- Any actual or suspected data breach reported to the Managing Director immediately, investigated promptly, and notified to the Office of the Australian Information Commissioner where required under the Notifiable Data Breaches scheme
- Clients notified of any data breach affecting their personal information or the personal information of their tenants

05 Marketing Communications

5. Marketing Communications

CPP's marketing activities comply with the Spam Act 2003 (Cth) and applicable privacy legislation:

- Marketing communications sent only to individuals who have consented to receive them
- All marketing communications include a clear and functional unsubscribe mechanism
- Unsubscribe requests actioned within 5 business days
- Personal information used for marketing purposes not disclosed to third parties for their own marketing purposes without express consent

06 Access, Correction & Complaints

6. Access, Correction & Complaints

Individuals have the right to access personal information held about them by CPP and to request correction of inaccurate information. Privacy complaints or access requests should be directed in writing to the Managing Director. CPP will respond within 30 days.

Stephen Clark

Managing Director

CLARK Property Partners Pty Ltd

June 2026

Version 1.3

Review Due: June 2027

Policy Owner: Managing Director, CPP