

## ABN Group companies privacy policy

Last updated: June 2025

At ABN Group, we respect and protect the privacy of our clients, prospective clients and other visitors to our ABN Group Website. This Privacy Policy explains how our clients', prospective clients', other visitors', prospective, current and past employees', contractors' and sub-contractors' personal information is collected and used. This Privacy Policy applies to ABN Group and ABN Group's Website, marketing activities, products, services and existing client database (that is, clients who have built/purchased with us in the past). Clients, prospective clients and other Website visitors can update their personal information by visiting our personal preference pages on ABN Group's Website (or opt-out pages if a preference page does not exist).

### *ABN Group*

Information collected on any ABN Group Company Website, or through marketing activities or from existing client, employee, contractor and subcontractor databases will belong to ABN Group and may be utilised for direct marketing activities by other ABN Group Companies.

As at the date of this Privacy Policy, ABN Group Companies include ABN Group Pty Ltd (ABN 68 608 225 458), [Boutique Homes](#), [Homebuyers Centre](#), [Celebration Homes](#), [Dale Alcock Homes](#), [Dale Alcock Homes South West](#), [Dale Alcock Projects](#), [Webb & Brown-Neaves](#), [Resolve Finance](#), [Bluebay Home Loans](#), [PACT Construction](#), [The Maker Designer Kitchens](#), [Boeing Plumbing](#), [Ceiling Solutions](#), [Hi-Point Roofing WA](#), [Home Assist](#), [Home Collective](#), [Parcel Property](#) and [Concretus](#) (which together with any of our other related entities from time to time are referred to in this Privacy Policy as ABN Group, we, us or our).

### *Employees, contractors and sub-contractors*

ABN Group and ABN Group Companies also collects and retains information about its employees, contractors and sub-contractors for the purpose of conducting its business and providing ongoing business services. ABN Group and ABN Group Companies may also hold information, from time to time, provided by persons and companies who seek employment, or a contractor relationship, with ABN Group.

### *Information collection and usage*

In most cases, if you choose not to provide your personal information to us for the purposes set out in this Privacy Policy, or if we do not or are unable to collect the personal information we require, we may not be able to provide you with requested information, products or services, or to effectively conduct our relationship with you.

ABN Group, at all times, take reasonable steps to collect your Information directly from you, unless:

- it is unreasonable or impracticable for us to do so; or
- you consent to the collection of the Information from someone other than you; or
- we are required or authorised by or under the GDPR or Australian law, or a court/tribunal order, to collect the Information from someone other than you.

Personal information, being information or an opinion about an identified individual, or an individual who is reasonably identifiable.

Sensitive information, being information or an opinion about an individual's personal preferences or characteristics (such as race, ethnicity, political views, memberships, religious or philosophical beliefs and sexual preference), health information and/or biometric information.

*What personal information do we collect and hold?*

The types of personal information we may collect about an individual will depend upon the nature of our interaction with them. Your personal information is likely to initially be collected directly from the ABN Group Company that you interact with. Personal information that we collect may include (but is not limited to) the following:

*Generally:*

- Name;
- Age and/or date of birth;
- Contact details including telephone numbers (landline and/or mobile);
- Address (including postal address);
- Email address;
- Socio-economic/demographic information;
- Personal preferences;
- Household information;
- Gender;
- Identification information such as driving licence details, including driving licence number;
- Payment details, such as your credit card or bank account details; and
- Information from publicly available social media accounts and profiles.

*About our employees/prospective employees, contractors and sub-contractors:*

- Occupation and employment details including employment status and any previous work experience;
- Information from or in connection with your resume or job application if you apply for a position with us;
- Australian Business Number (ABN); and
- Passport and visa details.

In relation to our employees, we are authorised to collect tax file numbers (TFNs) by the *Income Tax Assessment Act 1936 (Cth)*. It is not compulsory for you to provide your TFN for our products and services, but if you do not, taxation law may require additional deductions to be made from amounts payable to you.

*How and when do we collect personal information?*

ABN Group collects information about prospective clients and clients online, in-person and through telephone enquiries. ABN Group is the sole owner of the information and will use this data in accordance with this Privacy Policy and as permitted or required by law. ABN Group will not sell or rent this information to unaffiliated third parties.

We may also collect your personal information in the course of providing you with goods or services, or:

- When you make an enquiry about or buy our products or services;
- When you provide us, or you offer or apply to supply us, with goods or services;
- When you provide information to us in any way (including by completing a form, disclosing information over the phone or via email, or providing us a business card);
- When you request information about us, or our products or services;
- When you provide feedback to us;
- When you visit, fill in a form on, or otherwise interact with, our Website (including 'live chat' functions);
- When you visit premises from which we operate;
- When you (or your employer) provide that information to us in the course of conducting or administering our relationship with you, or when you are carrying out activities in connection with our business operations;
- When you submit a job application to us;
- When you otherwise contact us by telephone, fax, email, social media, post or in person; or
- Where we are otherwise required or authorised by law to do so.

Generally, when providing our products and services, dealing with our personnel, or obtaining goods and services from our service providers, suppliers or contractors, we collect personal information directly from the relevant individual where reasonable and practicable. However, we may also collect personal information about you from third parties and other sources such as:

- Your nominated representatives (eg spouse, accountant, power of attorney, brokers and other professional advisors);
- Publicly available sources of information; or
- other ABN Group Companies,

but we will only collect your personal information in this way if it is unreasonable or impracticable to collect this information directly from you or if we are otherwise permitted to do so.

If at any time you provide the personal information of another person, you must ensure that the other person has read and understood this Privacy Policy and separately consents to that personal information being used and disclosed by us in accordance with this Privacy Policy.

Where we engage with you multiple times over a short period in relation to the same matter, we may not provide you with a separate notice about privacy each time we engage with you.

#### *Website and online technologies*

##### Generally

ABN Group collects information at several different points on its Website in order to better serve its Website visitors' needs.

ABN Group Website offers several opportunities for visitors to register for promotional and information mailings and for assistance in evaluating its products and service. The registration forms enable visitors to opt in to ABN Group's mailing lists and require visitors to give certain information. If available, we also collect acquisition data (such as site referrals, campaign tracking, and search data), behavioural data (such as pages visited, time spent on our website, and number of visits), and technical data (such as browser and operating system used to access our website). This data is collected and associated with your personal information when registration or contact forms are completed, or if logged into a website.

We use this contact information to send information about ABN Group Companies or their products and services. You may opt out of receiving future direct marketing communications at any time (see the opt-out section below).

##### Google Analytics

We use Google Analytics to help analyse how you use our Website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated is used to create reports about the use of our Website. Google will store this information.

If you do not want your Website visit data reported by Google Analytics, you can install the Google Analytics opt-out browser add-on. For more details on installing and uninstalling the add-on, please visit the Google Analytics opt-out page at <https://tools.google.com/dlpage/gaoptout>.

##### Click Stream Data

When you read, browse or download information from our Website, we or our internet service provider may also collect information such as the date, time and duration of a visit, the pages accessed, the IP address of your computer, and any information downloaded. This information may be used for purposes including statistical, reporting and website administration, maintenance and improvement purposes.

##### Cookies, pixel tags and email tracking

ABN Group uses pixel tags and other methods to gather information about the emails it sends to registered Website visitors and recipients of emails sent by ABN Group's Website visitors to others.

Pixel tags are tiny graphic files that are included in HTML-encoded email messages. When such a message is opened in an HTML-capable email program, the recipient's computer will access the ABN Group's servers to retrieve the pixel tag file, allowing ABN Group to record and store information such as an email address, date and time the recipient viewed the email message if the recipient's email program is capable of receiving HTML and other logging information. ABN Group uses this information to optimise delivery of future messages to specific recipients and to provide information to registered users with respect to emails they send through the ABN Group system.

ABN Group maintains log files tracking IP addresses to analyse trends, help diagnose problems with our servers, and to monitor traffic/usage in order to provide better service to its clients and Website visitors.

ABN Group uses cookies to deliver content specific to Website visitors' interests and to improve the convenience and efficiency of its clients' experience when using its products and services. A cookie is a piece of data stored on the user's hard drive tied to statistical information about the user. Usage of a cookie is in no way linked to any personal information in ABN Group's products and email messages. Visitors can always choose to not accept cookies, but in doing so they may not be able to use some of ABN Group's products and services and you may not be able to gain access to all of the content and facilities on the Website. You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.

Some of our business partners, such as our Web analytics provider, also use cookies on our Website. These cookies are used to track visitor behaviour, and ABN Group has no access to or control over these cookies. This Privacy Policy covers the use of cookies by ABN Group only and does not cover the use of cookies by any third parties.

#### *Remarketing / Advertising networks*

We use third party vendors to advertise online and third party affiliations to run advertising on websites and online platforms. Third party vendors, including Google, show our ads on sites across the Internet by using cookies to serve ads based on someone's past visits to our websites.

This enables us and network advertisers to target advertisements to you for products and services in which you might be interested. Ad network providers, advertisers, sponsors, and/or traffic measurement services may use pixels, cookies, JavaScript, web beacons (including clear GIFs), Flash LSOs, and other tracking technologies to measure the effectiveness of their ads and to personalize advertising content to you. These pixels, cookies and other technologies are governed by each entity's specific privacy policy, not this Privacy Policy. We may provide these advertisers with information, including personal information, about you.

Where permitted by applicable law, we can use third party vendor remarketing services, including Google's 'Customer Match' and Meta's 'Custom Audience' to display ads. This means if you have provided us with your contact details, we may upload these to third party vendors who perform remarketing services on our behalf, so that we can better target ads and content to you and others with similar interests on other websites or media (Custom Audiences). We may also work with other ad networks and marketing platforms that enable us and other participants to target ads to Custom Audiences submitted by us and others. You may also control how Google, Meta and other ad

networks display certain ads to you, as explained further in their respective privacy policies or by using the opt-outs described below.

You can opt out of Google's use of cookies by visiting Google's [Ads Settings](#). If you want to permanently opt out of Google's DoubleClick cookie, you can install the [DoubleClick opt out extension](#). To opt-out of Meta Custom Audiences, go to the Facebook ad preferences page.

You may be able to opt out of many other ad networks. For example, you may go to the Digital Advertising Alliance (DAA) Consumer Choice Page for information about opting out of interest-based advertising and their choices regarding having information used by DAA companies. You also have the option to opt out of a third-party vendor's use of cookies by visiting the [Network Advertising Initiative opt out page](#), for information about opting out of interest-based advertising and your choices regarding having information used by NAI members.

Opting out from one or more companies listed on the DAA Consumer Choice Page or the NAI Consumer Opt-Out Page opt you out from those companies' delivery of interest-based content or ads to you, but it does not mean you will no longer receive any advertising through our Website or on other websites. You may continue to receive advertisements, for example, based on the particular website that you are viewing (i.e. contextually based ads). Also, if your browsers are configured to reject cookies when you opt out on a consumer choice website, your opt out may not be effective.

#### *Social media*

ABN Group may engage with customers or prospective customers through social media channels such as Facebook, YouTube, Instagram etc.

From time to time we may use this posted and uploaded media aggregated data for marketing materials and promotions and as such where possible, will endeavour to notify the owner before use.

#### *Review platforms*

ABN Group may engage with customers through review platforms such as Product Review and Google Review.

We aggregate commentary and reviews that has been uploaded manually to our website or posted publicly and willingly by users on their review platforms. The use of this information sent via these review platforms is governed by the individual platform's security and privacy regulations. From time to time we may use this posted and uploaded media aggregated data for marketing materials and promotions and as such where possible, will endeavour to notify the owner before use.

#### *Links to other websites*

ABN Group's Website may contain links to other Websites. ABN Group is not responsible for the privacy practices or the content of such other Websites. Third parties may independently collect information about Website visitors when they view ads or other communications from third parties through ABN Group's products or services. If visitors do not want those companies to collect information about them, they should contact these companies directly.

### *How we use your personal information*

We use the personal information we collect about you for our business functions and activities, in order to operate our business efficiently, and to market our products and services for the benefit of our customers.

We may collect, hold and use your personal information:

- To identify and communicate with you;
- To enable us to provide you with requested information, products or services;
- To otherwise assist customers by providing them with information and support;
- To collect and process payments;
- To help us to manage and enhance products or services we provide to you;
- To help us to manage and enhance goods and services we procure from our suppliers and subcontractors;
- To personalise and customise your experiences on our Website;
- To manage and administer any account you may hold with us;
- To promote and market our products and services to you;
- To provide you with information that we believe may be of interest to you or that you may be interested in receiving, including advertising material, regarding us, our clients, and our business partners;
- To conduct research for the purposes of improving existing products or services or creating new products or services;
- To help us research the needs of our customers to enable us to market our products and services with a better understanding of your needs and the needs of customers generally – including for us or our third party service providers to contact you for the purposes of undertaking market research, focus groups and brand profiling exercises;
- To protect you and us from fraud;
- To provide for the safety and security of workers and onsite visitors
- To help us manage our business operations;
- For business support purposes including maintenance, backup and audit
- To process any job application submitted by you;
- To respond to any queries or complaints you may have;
- To investigate, review, mitigate risks associated with, and inform you of, a data or other security breach involving your personal information, or
- to comply with our statutory and legal obligations.

You consent to us using your personal information in the above ways and as set out in this Privacy Policy.

We may otherwise collect, use or disclose your personal information where the collection, use or disclosure is:

- in accordance with this Privacy Policy or any agreement you enter into with us, or
- required or authorised by law, including without limitation the Australian Privacy Principles under the *Privacy Act 1988 (Cth)*.

#### *Disclosures of personal information*

We may disclose, or provide access to, your personal information to third parties in connection with the purposes described under "How we use your personal information".

Depending on the circumstances and the nature of your engagement with us, we may disclose your personal information to other ABN Group Companies, to third parties that provide products and services to us or through us, or to other third parties (such as your referee(s) in connection with a job application you have submitted).

We may disclose your personal information to:

- Your nominated representatives;
- Other organisations or individuals who assist us in providing products and services to you;
- Professional service providers and advisors who perform functions on our behalf, such as lawyers;
- Representatives, agents or contractors who are appointed by us in the ordinary operation of our business to assist us in providing goods or services or administering our business (such as for data storage or processing, printing, mailing, marketing, market research and brand profiling, planning and product or service development);
- Banks, lenders, valuers, insurers, brokers, auditors, business consultants and IT service providers; and
- Government, regulatory authorities and other organisations as required or authorised by law.

ABN Group do not disclose personal information to third parties except if:

- We have the individual's permission to make the disclosure;
- The disclosure is for warranty purposes, meaning we will pass on the details necessary for a customer to be covered by individual manufacturer warranties for some of the appliances we install in their home;
- The disclosure is permitted by law or mandatory professional standards;
- The disclosure is reasonably related to the sale or other disposition of all or part of our business or assets;

- The personal information to be disclosed is publicly available;
- The party to whom the disclosure is made controls, is controlled by, or is under common control with ABN Group;
- The disclosure is on a confidential basis to agents that we use in the ordinary course of operating our business such as for data processing, printing or mailing; or
- The disclosure is to persons or entities for which we are providing services, provided the disclosure is consistent with the purpose for which the personal information was obtained.

#### *Unsolicited personal information*

We may receive your personal information as unsolicited personal information.

- Unsolicited personal information is received by an organisation where it took no active steps to collect that information.
- When and where ABN Group receives unsolicited information, we will determine whether it could have collected the information under Australian Privacy Principle 3 (which governs the collection of solicited personal information) and under the GDPR.
- Where we could not have collected the information consistent with Australian Privacy Principle 3 or the GDPR, we will destroy or de-identify the information as soon as practicable, so long as it is lawful and reasonable for us to do so.

#### *Notifiable data breaches*

- We are committed to protecting information we hold about you, and to comply with the Notifiable Data Breaches scheme.
- Where we become aware of a potential data breach which is likely to result in serious harm to any individuals about whom we hold information, we will: investigate the suspected breach and determine scope of any breach that has occurred and the risk of harm to affected individuals whose information may have been compromised;

notify you and the Privacy Commissioner of the potential breach; and take steps to minimise any harm caused to affected individuals as a result of the breach.

#### *Overseas disclosures*

We are a national organisation and may collect, use and disclose personal information generally within Australia (including between states and territories).

Some of your personal information may be disclosed, transferred, stored, processed or used overseas by us, or by third party service providers.

For example, this may happen if:

- our offices or related entities are overseas
- we outsource certain activities overseas

- transactions, information, services or products have an overseas connection, or
- our computer systems including IT servers are located overseas.

You consent to the collection, use, storage, and processing of your personal information outside of Australia as set out in this Privacy Policy.

In particular, your personal information may be disclosed to third parties in Vietnam and the Philippines, and such other countries outside Australia in which those parties or their, or our, computer systems may be located from time to time, where it may be used for the purposes described in this Privacy Policy.

#### *Marketing*

##### Generally

You consent to us using your personal information for sending you information, including promotional material, about us or our products and services, as well as the products and services of our related entities and third parties, now and in the future. You also consent to us providing you such information by means of direct mail, telemarketing, email, SMS and MMS messages

We typically undertake direct marketing in the following ways:

##### *In-person and telephone enquiries*

We use information collected in-person and over the phone to contact prospective clients and clients with information and promotional material about ABN Group Companies or their products and services.

Prospective clients and clients who do not register to receive marketing material may still be contacted by a Consultant about their enquiry. If a prospective client or client no longer wishes to receive contact from their Consultant they can advise us of this using the contact details at the bottom of this Privacy Policy. You may opt out of receiving future direct marketing communications at any time (see the opt-out section below).

##### *Existing client database*

The contact details of clients who have built/purchased with an ABN Group company will be included on ABN Group database.

ABN Group and ABN Group Companies will utilise the information on its database to send promotional information about an ABN Group Company or their products and services. You may also receive direct marketing from or about other ABN Group Companies with whom you may not yet have interacted. At the point of collection, the clients' details will remain in ABN Group's database for future direct marketing activities. You may opt out of receiving future direct marketing communications at any time (see the opt-out section below).

##### *Opting out of marketing and promotions*

You can opt out of receiving direct marketing from us in the following ways:

- By telling us during a telemarketing phone call.

- By following the instructions included in each newsletter or promotional communication.
- By visiting the preferences page on ABN Group's website (or opt-out pages if a preference page does not exist).
- By emailing [privacy@abngroup.com.au](mailto:privacy@abngroup.com.au) at any time.

If you are included on multiple ABN Group Companies' databases, you will need to specify that you want to opt-out of all ABN Group Company databases (otherwise you will only be opted-out of one company's database but not the others).

When an opt-out request is made your details are marked in our database with an unsubscribe 'flag' so that you do not receive further direct marketing from us. If we know your postal address it will be added to a suppression list to be excluded from any future posted direct marketing.

Opt out requests exclude any non-marketing communications that we deliver (by email, post, phone or other means) that are related to a contract that you have signed with us (e.g. building updates).

#### *Security and privacy*

ABN Group takes every reasonable precaution to protect the confidentiality and security of the personal information of Website visitors, prospective clients and clients and others whose personal information we hold by using industry-standard security safeguards, such as firewalls, coupled with carefully developed security procedures. These physical, electronic and procedural measures are designed to protect visitor and client information from loss, misuse or unauthorised alteration.

#### *Data storage and retention*

Information collected by ABN Group is stored in Australian & overseas data centres (Private & Public Cloud). ABN Group ensures any overseas vendors involved in the collection and storage of private data are compliant with this outlined Privacy Policy and the GDPR.

We will retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. When personal information is no longer needed for any purpose for which the information may be held, used or disclosed, it will be destroyed or permanently de-identified.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information, whether we can achieve those purposes through other means and the applicable legal requirements.

In some circumstances we may anonymise your personal information (so that it can no longer be associated with you) for analytics, research or statistical purposes in which case we may use this anonymised information indefinitely without further notice to you.

#### *Access, correction, and removal of personal information*

If ABN Group becomes aware that any information that we hold is not correct, we will use our best endeavours to obtain the correct information by contacting the individual whose information is not correct.

ABN Group will allow its records containing Personal Information to be accessed and/or corrected by the individual concerned in accordance with the Privacy Act.

Individuals wishing to lodge a request to access and/or correct their Personal Information should do so by contacting ABN Group, as per the details at the bottom of this Privacy Policy.

*Complaints and Dispute resolution*

If you feel ABN Group is not abiding by this Privacy Policy you should first contact ABN Group Communications by email at [privacy@abngroup.com.au](mailto:privacy@abngroup.com.au).

ABN Group will respond to complaints in writing (by reply-email) and will endeavour to do so within 30 days.

*Changes to this policy*

Any new policy will be posted on our Website at least fourteen (14) days prior to its taking effect.

*Contact us*

If you have questions or concerns regarding this Privacy Policy, complaints about our use of personal information, or would like to opt-out of receiving marketing material, you should first contact ABN Group at the contact address listed below or via email at [privacy@abngroup.com.au](mailto:privacy@abngroup.com.au).

ABN Group  
301 Vincent Street, Leederville, WA 6007  
[privacy@abngroup.com.au](mailto:privacy@abngroup.com.au)

This Privacy Policy is effective from the date stated at the beginning of this Privacy Policy.