



CLIFTON
LIFESTYLE

Privacy Policy

1. Scope

This Privacy Policy applies to Clifton Lifestyle Management Pty Ltd ABN 48 646 465 938 and its related bodies corporate and trusts (**we, us, our**).

A list of our related entities and trusts is available on request.

We comply with the *Privacy Act 1988 (Cth)* (**Act**) and the Australian Privacy Principles (**APPs**).

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

2. Personal information we collect

We collect personal information that is reasonably necessary to operate our business.

This may include:

- Name and contact details
- Date of birth
- Gender
- Payment and transaction details
- Marketing preferences
- Employment history, background checks, and qualifications for job applicants
- Any other information you provide to us directly

We do not intentionally collect sensitive information (as defined by the Act) unless required and permitted by law.

3. How we collect personal information

We collect personal information in several ways, including:

- When you use our website
- When you contact us by email, phone, or form
- When you register for updates, offers, or events
- When you engage with our advertising or social media content
- When you apply for employment with us

We generally collect information directly from you. We may also collect information through analytics and advertising providers and payment processors.

4. How we hold personal information

We hold personal information in electronic systems and databases. These may be operated by us or by trusted third-party service providers.

We use reasonable safeguards, including access controls and secure online hosting environments.

5. How we use personal information

We use personal information to:

- Provide and manage our products and services
- Communicate with you
- Send marketing and promotional material
- Improve our website, services, and customer experience
- Conduct advertising, remarketing, and audience targeting
- Process payments
- Manage recruitment
- Meet legal and regulatory obligations

We retain personal information only for as long as required for our business and legal requirements. We then destroy or de-identify it where lawful and practicable.

6. Direct marketing

We may use your personal information for direct marketing where permitted by law.

You can opt out at any time by:

- Using the unsubscribe link in our communications
- Replying "STOP" to SMS messages, where applicable
- Contacting us at info@cliftonlifestyle.com.au

We action opt-out requests as soon as reasonably practicable.

If we have not collected your personal information directly from you, you may request that we tell you the source of your personal information, unless it is unreasonable or impracticable to do so.

7. Disclosure of personal information

We do not sell personal information.

We may disclose personal information to:

- Other Clifton entities
- Professional advisers
- IT, hosting, marketing, analytics, and payment service providers
- Regulators, courts, or law enforcement where required by law
- Prospective purchasers of a business or assets, on a confidential basis

If ownership or control of a Clifton entity changes, personal information may be transferred as part of that transaction.

8. Overseas disclosure

We may disclose personal information to overseas recipients. This may occur where we use cloud hosting providers, analytics and advertising platforms and technology service providers which operate outside Australia, including in the United States of America. We may also disclose personal information to recipients in other countries where our service providers or their personnel are located from time to time.

We take reasonable steps to ensure overseas recipients handle personal information consistently with Australian privacy requirements.

9. Cookies and online advertising

We use cookies and similar technologies to operate and improve our website, analyse usage and deliver relevant advertising.

We use third-party platforms such as Google and Meta (the group holding company of Facebook and Instagram) for advertising and remarketing, including custom and lookalike audiences.

You can manage advertising preferences through the relevant platform settings and your browser controls.

10. Anonymity and pseudonymity

Where lawful and practicable, you may deal with us anonymously or using a pseudonym. In some circumstances we may need to identify you to provide services, process payments, or comply with legal obligations.

For example, we cannot deal with you anonymously or using a pseudonym when you enter into a contract with us (including to purchase a home from us) or where we need to verify your identity.

11. Unsolicited personal information

If we receive personal information that we did not request, we will assess whether we could have collected it under the Act. If not, we will destroy or de-identify it where lawful and practicable.

12. Access and correction

You may request access to, or correction of, your personal information by emailing info@cliftonlifestyle.com.au.

We will respond within a reasonable timeframe and in accordance with the Act.

13. Complaints

If you believe we have breached privacy laws, you may make a complaint by contacting us at info@cliftonlifestyle.com.au.

We acknowledge your complaint promptly and investigate and respond, usually within 30 days.

If you are not satisfied, you may lodge a complaint with the Office of the Australian Information Commissioner.

14. Data breaches

If we become aware of unauthorised access to, or disclosure of, personal information, we will assess the incident and take reasonable steps to reduce potential harm. Where required by law, we will notify affected individuals and regulators.

15. Children

Our services are not directed to individuals under 16 years of age. We do not knowingly collect personal information from children.

16. Third-party links

Our website may contain links to third-party sites. We are not responsible for the privacy practices of those sites.

17. Changes to this policy

We may update this Privacy Policy from time to time. The latest version will be published on our website.

18. Contact

Email: info@cliftonlifestyle.com.au

Effective date: March 2026
cliftonlifestyle.com.au