

PRIVACY POLICY

Transpire Constructions Pty Ltd

ABN 60 605 032 764

Last updated: July 2026

1. Introduction

Transpire Constructions Pty Ltd (ABN 60 605 032 764) (we, us, our) is an Australian residential building company operating in New South Wales and Queensland. We are committed to protecting the privacy of individuals whose personal information we collect and handle in the course of our business.

This Privacy Policy explains how we collect, use, disclose, store and otherwise handle personal information in accordance with the Privacy Act 1988 (Cth) (Privacy Act) and the Australian Privacy Principles (APPs) contained in Schedule 1 to the Privacy Act, as amended from time to time, including amendments introduced by the Privacy and Other Legislation Amendment Act 2024 (Cth).

This Policy applies to all personal information we hold about individuals, including prospective and current clients, contractors, suppliers, employees and job applicants.

By engaging with us, using our website at transpiregroup.com.au, or providing us with your personal information, you acknowledge that you have read and understood this Policy.

This Policy is available free of charge on our website. On request, we will also provide a copy in an alternative form, where it is reasonable and practicable for us to do so.

Under the Privacy Act, acts and practices directly related to current and former employment relationships and employee records are generally exempt from the Australian Privacy Principles. This Policy applies to the personal information of employees to the extent the Privacy Act applies, and applies in full to job applicants, contractors and suppliers.

2. Who We Are

Transpire Constructions Pty Ltd is a residential building company with offices at:

- Gold Coast Office: Suite 3.3, 328 Scottsdale Drive, Robina QLD 4226 | (07) 5588 3600
- Sydney Office: Level 1, 965 Pacific Highway, Pymble NSW 2073 | (02) 8459 7472

For all privacy enquiries, please contact us using the details in section 14 of this Policy.

3. What Personal Information We Collect

We collect personal information that is reasonably necessary for our business activities. The types of personal information we may collect include:

3.1 Clients and prospective clients

- Full name, date of birth and contact details (address, email, phone)
 - Financial information, including income details, bank account information (where relevant to financing arrangements)
 - Property details and land titles information
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- Government identifiers such as driver's licence numbers (for identity verification purposes)
- Signatures and copies of identification documents
- Communication records and correspondence

3.2 Employees and job applicants

- Name, contact details and employment history
- Tax file numbers and superannuation details
- Background check information (where applicable and with consent)
- Payroll and performance information

3.3 Contractors and suppliers

- Business and personal contact details
- Licensing and insurance information
- Banking and payment details

3.4 Website visitors

- IP address and browser information
- Enquiry and contact form submissions
- Information submitted through our online portals

3.5 Sensitive information

Some of the information we collect may be sensitive information, for example background check information for employment purposes or health and safety information relevant to a building site. We collect sensitive information only where it is reasonably necessary for our functions or activities and you have consented, or where the collection is otherwise required or authorised by law.

We collect only the personal information that is necessary for the relevant purpose. Where practicable, we will give you the option of interacting with us anonymously or by pseudonym.

4. How We Collect Personal Information

We collect personal information in a number of ways, including:

- Directly from you when you enquire about or engage our services, complete a contact or enquiry form, sign a building contract, attend our display homes or offices, or communicate with us by phone, email or in person
- From third parties such as real estate agents, land developers, financial brokers, solicitors and conveyancers, background check providers and public registers
- Through our website and online agent portal
- From publicly available sources

Where we collect personal information about you from a third party or from a publicly available source, we will, where required by the Privacy Act, take reasonable steps to notify you of the collection.

5. Why We Collect and How We Use Personal Information

We collect and use personal information for purposes including:

- Responding to enquiries and providing information about our house designs, services and projects
- Entering into and administering building contracts and related agreements
- Managing the construction process, including coordinating with contractors, suppliers and local authorities
- Processing payments and managing financial arrangements
- Complying with our legal and regulatory obligations, including under building legislation in NSW and QLD
- Communicating with you about the progress of your build
- Recruiting and managing employees and contractors
- Improving our services and website
- Sending you marketing communications about our services, where you have consented or where permitted by law

We will only use personal information for the primary purpose for which it was collected, or for a secondary purpose where you would reasonably expect us to use it for that purpose, you have consented, or an exception under the Privacy Act applies.

6. Disclosure of Personal Information

We may disclose personal information to third parties in the following circumstances:

- Contractors, tradespeople and suppliers involved in the construction or delivery of your project
- Financial institutions and mortgage brokers, where relevant to your building finance arrangements
- Our professional advisors, including lawyers and accountants
- Government agencies and local councils where required for permits, approvals and compliance
- Marketing and technology service providers who assist with our business operations, including website hosting, CRM and communications platforms
- Any person or entity to whom disclosure is required or authorised by law

We do not sell personal information to third parties.

Where we engage third parties to handle personal information on our behalf, we take reasonable steps to ensure those parties handle the information in accordance with the Privacy Act.

7. Cross-Border Disclosure

The main circumstance in which we may store personal information outside Australia is through our technology providers, in particular Microsoft, which supplies our email and related cloud services. While these providers store data for Australian customers primarily in Australian data centres, some personal information may be processed, backed up or accessed in other countries in which they operate. Before disclosing personal information to an overseas recipient, we take reasonable steps to ensure that the recipient does not breach the Australian Privacy Principles in relation to that information, as required under APP 8. We remain accountable for personal information disclosed to overseas recipients in these circumstances.

Where required by the Privacy Act, we will take contractual or other steps to protect your information before any cross-border transfer.

8. Storage and Security

We store personal information in secure electronic and physical systems. We take reasonable steps to protect the personal information we hold from misuse, interference, loss, unauthorised access, modification or disclosure. These steps include:

- Password-protected systems and access controls
- Secure physical storage of paper-based records
- Staff training on privacy and information security obligations
- Regular review of our information security practices

We will retain personal information for as long as it is required for the purposes for which it was collected, or as required by law. For example, we may retain records relating to building work for the periods required under applicable building, taxation and statutory warranty laws in New South Wales and Queensland. When personal information is no longer needed, we will take reasonable steps to destroy or de-identify it.

If we experience a data breach that is likely to result in serious harm to any individual whose personal information is involved, we will assess and respond to the breach in accordance with the Notifiable Data Breaches scheme under Part IIIC of the Privacy Act. This includes notifying affected individuals and the Office of the Australian Information Commissioner where required.

9. Marketing Communications

We may send you marketing communications about our services, new house designs and promotions where you have consented to receive them or where otherwise permitted by applicable law, including the Spam Act 2003 (Cth).

You may opt out of receiving marketing communications at any time by contacting us using the details in section 14, or by using the unsubscribe link in any electronic marketing message we send you. We will process opt-out requests promptly.

10. Website and Cookies

Our website at transpiregroup.com.au may use cookies and similar technologies to improve your browsing experience and to analyse website traffic. A cookie is a small file placed on your device when you visit our website. You can configure your browser to refuse cookies, however this may affect the functionality of some parts of our website. We may use third-party analytics providers to help us understand how our website is used. These providers may collect and process information, including on servers located outside Australia. Any such overseas disclosure is handled in accordance with section 7 of this Policy.

Our website may contain links to third-party websites. This Policy does not apply to those websites, and we encourage you to read the privacy policies of any third-party websites you visit.

11. Automated Decision-Making

This section describes how we use, or may use, computer programs or automated tools in connection with decisions that may affect your rights or interests. It is included in accordance with Australian Privacy Principles 1.7, 1.8 and 1.9, which take effect from 10 December 2026.

11.1 What is automated decision-making?

Automated decision-making (ADM) refers to decisions made or substantially assisted by a computerised process, which may involve artificial intelligence (AI), machine learning, or rules-based logic, operating with limited or no human intervention.

11.2 Our current use of automated tools

As at the date of this Policy, Transpire Constructions does not operate ADM systems that make decisions solely by automated means and that could significantly affect your legal rights or interests.

We may use general business software tools, including customer relationship management (CRM) platforms, email communication tools and project management systems, that process personal information in the course of our ordinary operations. These tools assist our staff in managing client communications and construction projects; they do not make significant decisions about individuals automatically and without human review.

11.3 Future use

If we introduce ADM systems in the future that make or substantially contribute to decisions which could significantly affect your rights or interests, and which use your personal information, we will update this Policy to disclose:

- The kinds of personal information used in the operation of those systems
- The kinds of decisions made solely by the automated operation of those systems
- The kinds of decisions for which an automated process performs a task substantially and directly related to making the decision (for example, filtering or scoring), with a human making the final determination

We will notify you of any material updates to this section in accordance with section 13 of this Policy.

11.4 Human review

Where any automated tool is used to assist in reaching a conclusion about you, our staff will review and take responsibility for any decision that could significantly affect your rights or interests before that decision is communicated to you. You may contact us at any time to request information about how a decision affecting you was made.

12. Access and Correction

You have the right to request access to the personal information we hold about you, and to request that we correct any information that is inaccurate, out of date, incomplete, irrelevant or misleading.

To make an access or correction request, please contact us using the details in section 14. We will respond to your request within a reasonable time (generally within 30 days) and in the manner requested where it is reasonable and practicable to do so.

We will not charge you for making an access or correction request, though we may charge a reasonable fee to cover the cost of providing access where permitted by the Privacy Act.

We may refuse access or correction in limited circumstances permitted by the Privacy Act. If we refuse, we will give you written reasons and information about how you may complain about the refusal.

13. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology or legal obligations. We will publish the current version of this Policy on our website at transpiregroup.com.au and update the "last updated" date at the top of this document. We encourage you to review this Policy periodically.

Where changes are material, we will take reasonable steps to notify affected individuals, including by posting a notice on our website.

14. Contact and Complaints

If you have a question or concern about how we handle your personal information, or if you wish to make an access or correction request, please contact our Privacy Officer:

- By email: privacy@transpiregroup.com.au
- By post: Privacy Officer, Transpire Constructions Pty Ltd, Suite 3.3, 328 Scottsdale Drive, Robina QLD 4226
- By phone: (07) 5588 3600

We will acknowledge your complaint promptly and aim to resolve it within 30 days. If you are not satisfied with our response, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC):

- Website: www.oaic.gov.au
 - Phone: 1300 363 992
 - Post: GPO Box 5218, Sydney NSW 2001
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