

Privacy Policy

INTRODUCTION

Core Realty Pty Ltd ACN 160214844 respects your right to privacy, abides by the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) [APPs] and is committed to protecting the privacy of individuals who deal with us.

This privacy policy tells you how we manage your Personal Information that we collect and hold for you. In this policy we seek to allay any concerns you may have about how we handle your Personal Information by clearly setting out:

- Types of Personal Information we collect from you
- How we collect and hold it
- How we use and disclose it
- How we keep it secure
- How you may access and correct it
- How we will deal with a privacy complaint you make
- How you can contact us

This Privacy Policy applies to Core Realty but not to other organisations or websites to which we are linked. It covers Personal Information collected, held, used and disclosed by Core Realty in relation to:

- prospective or actual vendors and purchasers
- prospective or actual landlords and tenants
- visitors to our website
- our suppliers/independent contractors
- recruitment [but not existing employees]

TYPES OF PERSONAL INFORMATION WE COLLECT FROM YOU

First let us explain for you the meaning of Personal Information as it is used in this privacy policy.

Personal Information as it is used in this privacy policy and as defined in s 6(1) of the Privacy Act 1988 (Cth) means:

information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or an opinion.

Another important category of Personal Information in the Privacy Act is sensitive information. Sensitive Information is a subset of Personal Information, where more strict rules are imposed [usually requiring consent of the individual to use their sensitive Personal Information]. The Privacy Act defines Sensitive Information as:

- *information or an opinion about an individual's racial or ethnic origin; political opinions; membership of a political association; religious beliefs or affiliations; philosophical beliefs; membership of a professional or trade association; sexual preferences or practices; or criminal record – that is also Personal Information; or*
- *health information about an individual; or*
- *genetic information about an individual that is not otherwise health information; or*
- *biometric information that is to be used for the purpose of automated biometric verification or biometric identification, and biometric templates.*

The types of Personal Information we may collect from you will depend on the services you wish us to provide to you, or alternatively the services you offer or provide to us. Personal Information that is generally collected will be your name and contact details (home telephone/mobile phone numbers, fax, email and postal address). Where required for a stated purpose we may ask for your date of birth, gender and occupation.

Please note that sensitive information will only be collected with your express permission, and we will only use it for the purpose for which you provided it. This may include photographs or videos of you or others taken for the purpose of selling or leasing your property.

WHAT AND HOW WE COLLECT YOUR PERSONAL INFORMATION

We will generally collect Personal Information from you in person, over the phone, from an enquiry you make from our website or a third party website or from an email you send to us.

We don't collect your Personal Information unless we need it for any of our stated purposes or otherwise where we first obtain your consent.

In some circumstances, you may choose not to give us your Personal Information or to deal with us anonymously or using a pseudonym. However, this may mean that we are unable to carry out the services requested by you.

For prospective and actual purchasers – we will capture your Personal Information when you first approach us expressing your interest to buy a property. Personal Information may be collected from you at an Open for Inspection of a property. If you attend an auction and are the successful bidder, or if you purchase a property through the private sale process, your Personal Information will be recorded in the contract of sale provided to the vendor with copies retained by us.

For prospective and actual vendors – we will capture your Personal Information when we undertake an appraisal of your property, when you sign an Authority to Sell document, in sale documentation and during the course of the sale process.

For prospective and actual landlords – your Personal Information is collected when we undertake an appraisal of your property for lease, in your Leasing & Management Authority and your Management Instructions Form and whilst we manage your property.

For prospective and actual tenants – detailed Personal Information is collected from you when you complete a Residential Tenancy Application, including your address (current and past), rental history, employment information, drivers license, passport details, student or pension details [if applicable] and

your vehicle details. Additional Personal Information may be collected during the period of your tenancy.

For tenants and landlords we also collect the name and contact details of your emergency contact. For tenants contact details of other proposed occupants of the property and referees are also collected. You should obtain consent from these people before providing their personal details to us.

For suppliers/independent contractors – we collect Personal Information of key personnel providing services to us/our clients. This may include name, contact details, Australian business number, insurance details/claims history and emergency contacts.

For recruitment – If you apply to us for employment, in addition to your full name and contact details you will need to provide information to us about your education, employment history, and other information to support your application. You will be asked to provide references from past employers or relevant referees. Your application will constitute your express consent to our use of this information to assess your application and to allow us to carry out any monitoring activities, which may be required of us under applicable law as an employer.

For website users – see the section below on website privacy.

All Personal Information and documentation for the above categories of people are stored in physical files [stored securely]; hard drive [secured server]; email [secured server]; our client relationship database [secured server] and client management system/database [secured server].

HOW WE USE AND DISCLOSE YOUR PERSONAL INFORMATION

For prospective and actual vendors – we use your Personal Information to communicate with you during the appraisal of your property and the sale process. We may use it to engage service providers to assist you to prepare your property for sale, where these people need to contact you or gain access to your property. Your personal details are not used in the marketing of your property unless you expressly consent to this happening [eg if an article is published about your property that includes an owner profile]. During the selling process your name and contact details will be included in sale documentation that may be provided to potential purchasers and their advisers. If your property is auctioned details in the sale documentation will be made available to prospective purchasers.

For prospective and actual purchasers – where you indicate to us that you are interested in buying a property we may use your Personal Information to communicate with you about properties that are for sale or coming up for sale and inspection opportunities. Where we assist you in the sale process we will communicate with you and keep a written record of our communication on the relevant property file. If you become the purchaser your Personal Information will be used in the conveyancing process.

For prospective and actual landlords – We use your Personal Information to communicate with you during the leasing process and throughout the period that we manage your property. Whilst we manage your property we may need to use your Personal Information in a limited way when paying for council and water rates, dealing with the owners corporation on your behalf and other service providers. Your personal details may also need to be used if there is a need to deal with a tenancy matter in a VCAT, and/or where we need to utilise the services of the police, a debt-collector, your insurance company, Consumer Affairs Victoria. The privacy policies of these third parties will govern how they handle your Personal Information.

For prospective and actual tenants – Personal Information collected in your Residential Tenancy Application is required for us to assess your application to rent a property and generally to carry out our role as property managers including the ongoing management of your tenancy. To carry out this role, we may need to disclose your Personal Information to others including: the landlord or its legal representative; the landlord's lawyer, mortgagee or insurer; your nominated referees and current or past employers; the owner or managing agent of properties you currently rent or have rented in the past, organisations or trades people required to carry out maintenance to your rental property; utility suppliers of your rental property, Residential Tenancy Bond Authority; Residential Tenancy Tribunal/ Courts and other Government Agencies; Law enforcement authorities, debt-collectors or Consumer Affairs Victoria, operators of registered tenancy databases with rental history of certain tenants, and other real estate agents/property owners where property management/ownership changes.

As part of our tenant assessment process we may run a tenancy database check. This check profiles past tenants and may produce personal information about them such as tenancy history, details of bankruptcy, court orders or judgments, identity and/or visa verification, business credit history and directorship information. In this process we provide some of your personal details to the tenancy database manager, who is regulated by the Australian Privacy Principles.

For all above named real estate clients – Key sales and leasing documents may be created using VicForms, a service run by the Real Estate Institute of Victoria. Forms created using this service remain in the VicForms database and Personal Information is governed by the REIV privacy policy found at <https://reiv.com.au/privacy-collection-statement> To provide our services limited personal information may also be provided to real estate peak bodies.

For prospective or actual suppliers/independent contractors – We will use your Personal Information that you provide to us to enable you to deliver your services to us/our clients. Your acceptance of a supply or service work order will constitute your express consent to our use of your Personal Information for these purposes.

For recruitment – We will use your Personal Information that you provide to assess your application and to allow us to carry out any monitoring activities, which may be required of us under applicable law as an employer. Your application will constitute your express consent to our use of your Personal Information for this purpose.

Direct marketing

Once we have your Personal Information in our database we may contact you from time to time by post, telephone, email, sms, online or via apps for ongoing real estate marketing and sales related purposes, or to advise you of other related opportunities that we or a related company can offer to you. You will be given the option to opt-out of any such future approaches and to remove your personal details from our database. You can do this at any time by emailing our Privacy Officer and asking to be removed from the mailing list. Alternatively, you can mail or hand-deliver a written request asking to be removed. Contact details are set out below. There is no fee for doing this.

We may aggregate and process Personal Information to generate new insights about our client-base and network, so we can provide you with the best possible service for selling or leasing your property now or in the future.

Cross-border data-flows

There is a possibility that we may need to transfer your Personal Information to someone who is in a foreign country. However, we will only do so if we consider it necessary to provide our services to you; we have taken such steps as are reasonable in the circumstances to ensure that the information which is to be transferred will not be held, used or disclosed by the recipient of the information inconsistently with the APPs; and we reasonably believe that the recipient of the information is subject to a law/ binding scheme, which effectively overall upholds principles for protection of the information that are substantially similar to the APPs, and there are mechanisms that an individual can access to take action to enforce that law or binding scheme. Where a foreign recipient is not subject to laws similar to the APPs, we will seek your express consent to transfer your Personal Information to that entity/person for a stated purpose. In the case of a lease or sale of real estate where the other party is located outside Australia, you consent to your Personal Information being disclosed to the foreign-located party where this is required for your relevant property lease/sale purpose.

Website privacy

We operate our website found at www.wilsonagents.com.au (our website).

Our website may record information collected when you visit our website. The information recorded may include the date and time of your visit, the pages accessed, any information downloaded, and any information and details that you enter for the purpose of contacting us for any reason. We may use information collected via our website for statistical, reporting and website administration and maintenance purposes.

Our website may use 'cookies' to help personalise your online experience. You have the ability to accept or decline cookies. If you choose to decline cookies, you may not be able to fully experience the features of our website.

We use Google Analytics to collect a range of information about your interactions with our website. Google Analytics collects the information using a number of techniques including cookies and Java Script. We use this information to evaluate the effectiveness of our website. Information about how Google handles Personal Information is available at <http://www.google.com.au/intl/en/policies/privacy/>. You can opt out of the collection of information via Google Analytics by downloading the Google Analytics Opt-out Browser Add-on.

Social media

We participate in social media such as Twitter, Instagram, Facebook and our website blog. If we think it is relevant to the quality of service that we provide, we may record the essence of any topic discussed by a particular individual and their name and may contact them.

Social media services also handle your Personal Information for their own purposes. These sites have their own privacy policies.

HOW WE KEEP YOUR PERSONAL INFORMATION SECURE

Keeping secure our client and other stakeholders' Personal Information is fundamental tenet of our business. We take and will continue to take active measures to ensure your Personal Information that we hold is kept secure and to actively consider whether we are able to retain or should securely dispose of Personal Information.

We will take reasonable steps to protect Personal Information from misuse, interference and loss, as well as unauthorised access, modification or disclosure. We will securely destroy or de-identify the Personal Information we hold once the information is no longer needed for any purpose for which the information may be used or disclosed under the Australian Privacy Act. An exception is where information must be retained by law or a court/tribunal order.

All completed real estate related files are archived in secure storage for a period of at least 7 years, after which time it will be securely destroyed. Physical files are held in secured off-site storage and electronic files are securely archived for a period of at least 7 years after which time they will be permanently deleted from our system.

We will retain your contact details in our client relationship management database, until you ask us to remove them or we are required by law to do so.

We have taken appropriate security safeguards and measures to protect Personal Information, which has included taking steps and implementing strategies to manage: governance; ICT security; data breaches; physical security; personnel security and training, relevant workplace policies; careful handling of Personal Information throughout its life cycle, regular monitoring and review of security systems.

While we make every effort to ensure the integrity and security of our network and systems, we cannot guarantee that our security measures will prevent third-party “hackers” from illegally obtaining this information. You can help us to keep your information secure. Please remember that any user name or password in relation to our website is personal to you and should not be made available to any other person. You should stop using your username and password and notify us immediately if you suspect that someone else may be using them.

HOW YOU MAY ACCESS OR CORRECT YOUR PERSONAL INFORMATION

If you ask us, we will usually give you access to the Personal Information we hold about you. We will need to confirm your identity before giving you access to your Personal Information.

There are some circumstances under the APPs where we may not give you access to your Personal Information. For example, we can't give you access if it would unreasonably affect someone else's privacy or if giving you access poses a serious threat to someone's life, health or safety.

There is generally no cost for accessing or correcting your Personal Information, unless the request is complex or resource intensive. If there is a charge, it will be reasonable and we will let you know what it is going to be so that you can agree to it before we go ahead.

Requests for access or correction should be forwarded to our Privacy Officer using any of the methods set out below. We will ensure that all requests for access or correction are considered and determined within 30 days of receipt.

By phone: 03 9329 3266

By email: privacy@corerealty.com.au

By post: Confidential – The Privacy Officer

Core Realty– 284 La Trobe Street, Melbourne VIC 3000

HOW WE WILL DEAL WITH ANY PRIVACY COMPLAINT YOU MAKE

How do I make a privacy complaint?

You may complain about a breach of the Australian Privacy Principles [APPs] by submitting your complaint in writing to our Privacy Officer using our Privacy Complaint Form:- [CLICK HERE TO VIEW](#)

Please consider the following before making a complaint:

- We can only consider complaints made about a person's Personal Information from the person themselves (or an authorised representative of that person).
- Any complaint should set out in as much detail as possible, all the relevant particulars relating to the complaint, including why the individual says that we have breached the APPs. Please complete the Privacy Complaint Form, which will assist with prompting you about all the relevant information required. A copy may be obtained on our website www.corerealty.com.au or on request from our Office.
- Any information collected on the Privacy Complaint Form may be used or disclosed for the purposes of the investigation process but only if it is relevant to the complaint.

How will my complaint be handled?

Our Privacy Officer will consider all complaints objectively in line with our Privacy Complaint Procedure and will:

- acknowledge receipt of your Complaint Form in writing within 7 days of receipt;
- Conduct an initial assessment of your complaint;
- Appoint an investigating officer [not connected to the complaint] to conduct an investigation into your complaint;
- Undertake an investigation;
- Make a determination as to whether a breach of the Privacy Act has occurred;
- Consider a remedy or action to be taken; and
- Communicate the decision to the person making the complaint within 30 days of receiving the complaint (where possible). If the matter is more complex and it is reasonable that we require further time to complete the investigation we will notify you of the estimated completion time in writing.

Sometimes it will not be possible to resolve a complaint to everyone's satisfaction. If we are unable to resolve the matter to your satisfaction, you may wish to escalate the matter to the Privacy Commissioner by calling the [OAIC Enquiries Line](#) on 1300 363 992; using the OAIC online [Privacy Complaint form](#); by mail; by fax, or by email.

CHANGES TO OUR PRIVACY POLICY

From time to time we may decide to amend or update our Privacy Policy. Changes will be posted on our website. We encourage you to periodically review our Privacy Policy so that you remain informed as to how we are protecting your Personal Information.

OUR CONTACT DETAILS

By phone: 03 9329 3266

By email: privacy@corerealty.com.au

By post: Confidential – The Privacy Officer, Core Realty – 284 La Trobe Street, Melbourne VIC 3000

We have in preparing this information used our best endeavours to ensure that the information contained therein is true and accurate, but accept no responsibility and disclaim all liability in respect of any errors, inaccuracies or misstatements contained herein. Prospective purchasers should make their own inquiries to verify the information contained herein.

All information contained in the Core Realty website is provided as a convenience to clients. All property prices displayed on the website are current at the time of issue, but may change at any time and are subject to availability.

WARNING

Information on the Website must not be used for any commercial purpose without the consent of Core Realty.

Core Realty reserves the right to take whatever legal action it deems necessary to protect the security of this site and the intellectual property rights of the information provided by Core Realty.

Such action may include, but is not limited to action for breach of the Copyright Act 1968 – Act no 63 of 1968, Trade Marks Act 1995 – Act No 119 of 1995, Trade Practices Act 1974 – Act No 51 of 1974 and Privacy Legislation, breach of contract and any obligation of confidentiality. In particular any unauthorised use of this information has the potential to misrepresent in a misleading fashion the involvement of Wilson Agents and its authorised agencies in the reproduction. Any such misuse will be prosecuted.

PRIVACY POLICY

Core Realty adhere to a strict privacy policy. It is our policy to maintain your privacy when you visit the Website. If you choose to provide your email address it will be kept confidential. We may use your email address to contact you in the future if you so choose. We will not sell or pass on your details to third parties.

FURTHER WARNING

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