



PRIVACY POLICY & COLLECTION NOTICE

The *Privacy Act* 1988 (Cth)(the **Act**) allows for 'personal information', including 'sensitive information' (which are defined in the Act) about you to be collected, used and disclosed provided we have provided you with notice and in certain circumstances also obtained your consent. In this Privacy Policy and, where appropriate, a reference to 'personal information' includes 'sensitive information'.

We may (from time to time) update, revise, amend or replace this Privacy Policy by posting any changes to it on our website or by giving you any other form of notification.

This Privacy Policy is available on our website, at our office and may also be made available to you at any property inspection or when we first communicate with you by email.

What personal information do we collect?

The types of personal information we collect will depend on your relationship and interactions with us. We may collect personal information about guests, prospective guests, property owners, contractors, suppliers and other individuals who interact with our business.

The personal information we may collect includes:

- **Identity information**, such as your name, date of birth and, where reasonably required, copies or details of identification documents used to verify your identity.
- **Contact information**, including your residential or postal address, email address and telephone number.
- **Booking and accommodation information**, including properties booked, dates of stay, number and names of guests, booking history, special requests and information relating to your stay.
- **Payment and transaction information**, including payment details, amounts paid or refunded, security deposits, bonds, charges and transaction records. Where payments are processed by a third-party payment provider or booking platform, we may not directly store your complete credit or debit card details.
- **Property owner information**, including contact details, property details, bank account details required for the payment of rental proceeds, ownership information, statements, agreements and other information necessary for us to manage a property on an owner's behalf.
- **Communications**, including emails, telephone enquiries, SMS messages, online messages, complaints, feedback and other correspondence with us.
- **Guest verification and compliance information**, including information reasonably required to verify a guest's identity, administer security deposits or bonds, investigate property damage, enforce booking terms and house rules, or comply with short-term rental accommodation requirements.
- **Property access information**, such as records relating to keys, access codes, smart locks or other property access systems.
- **Images and recordings**, which may include photographs supplied by you, photographs relating to property condition or damage, and CCTV or security footage where CCTV operates at a property or premises and its use is permitted by law.

- **Website and technology information**, including IP address, device and browser information, cookies, website usage information and information collected through our online booking systems.
- **Marketing preferences**, including whether you have subscribed to receive promotional communications from us and your communication preferences.
- **Information about contractors and suppliers**, including names, business and contact details, licences or qualifications where applicable, banking details and records relating to services provided.
- **Other information** that you voluntarily provide to us or that is reasonably necessary for us to provide our services, manage properties, administer bookings, respond to enquiries or comply with our legal obligations.

We may collect personal information directly from you or from third parties involved in providing our services, including property owners, booking platforms, payment processors, property management systems and other service providers.

Where reasonably practicable, you may choose not to provide certain personal information. However, if information is required to process a booking, verify your identity, provide access to a property, make or receive payments, manage a property or comply with our legal obligations, we may be unable to provide the relevant service without it.

How we collect personal information from you

We will collect personal information from you in the following circumstances:

Property Management

- if you are a prospective or current landlord and you want us to manage your property, then we will collect personal information from you in order to identify you and the property;
- if you are a prospective or current landlord and you want us to manage your property, then we will collect personal information from you in order to comply with our AML/CTF Obligations;
- if you are a prospective or current tenant and/or you inspect any rental property, then we will collect personal information from you when you attend the property inspection; and
- if you are a prospective or current tenant and you want to rent a property, then we will collect personal information from you, usually at the rental application stage from the rental application and supporting documentation that you supply. If you are the successful tenant then we may also collect personal information from you during the continuation of any tenancy or lease agreement with the landlord.

How we collect personal information from other sources

We can collect personal information about you from other sources in any manner permitted by the Act. We will only collect personal information from other sources where it is reasonably necessary for us to do so in relation to, or in connection with, any services we are supplying in connection with our real estate and/or strata agency business. Examples of such sources of personal information include:

- from your agents, other owners, insurers and underwriters, contractors, legal, financial and other advisors in relation to or in connection with any tenancy, lease or contract for sale of the property;
- from public registers including those managed by the NSW Land & Property Information;
- from publicly available information;
- from property valuers or related service providers; and
- from our other service providers including any third party that has been authorised to supply us with personal information.

When the law authorises or requires collection of personal information

There are laws that may require us to collect and disclose your personal information. For example, we may be required to collect and disclose your personal information pursuant to the *Property, Stock and Business Agents Act 2002* (NSW), including any regulation under that law.

How your personal information may be used

We may collect and disclose your personal information for the following purposes including

Property Management

- to identify and/or verify the identity of any prospective or actual landlord or tenant for any property we manage or propose to manage;
 - to process and assess any application received in relation to a tenancy or lease of any property;
 - to advertise, market and promote any tenancy or lease of any property;
 - to negotiate and prepare any tenancy agreement, lease or any other document for any property;
 - to liaise and exchange information with the landlord or the tenant as well as their agents, contractors, legal, financial and other advisors in relation to or in connection with any tenancy or lease of the property;
 - to manage any tenancy or lease agreement including the collection of rent and other amounts on behalf of the landlord and the preparation of required statements of account;
 - to ensure the safety and security of landlords and existing occupiers and of each of their property in connection with the inspection of any property by prospective tenants;
 - to provide your insurer with information relating to or connected with any property;
 - to comply with any applicable law in connection with the tenancy agreement or lease;
 - to confirm whether the landlord or tenant is registered for GST purposes;
 - to tell you about any other rental property that we are managing or any other service that we provide, unless you tell us not to (this is referred to as direct marketing);
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- Generally
 - to provide statistical and other information to the Real Estate Institute of New South Wales;
 - to allow us to run our business efficiently and to perform administrative and operational tasks;
 - to comply with any dispute resolution or other legal process;
 - to act on behalf of clients in accordance with any agency agreement and to comply with our obligations under that agreement;
 - in order to update our records and your contact details;
 - to operate controlled money accounts;
 - if we enter into or propose to enter into any agreement or arrangement with any party for the purpose of, or in connection with, the acquisition of our business (including any part of our business that includes personal information), then we may provide that party (including its legal, financial and other professional advisers) with personal information in relation to or in connection with those arrangements;
 - to comply with the law including our AML/CTF Obligations; and
 - any other purpose to which you have consented.

You can tell us at any time if you no longer wish to receive direct marketing information or offers from us. We will process your request as soon as reasonably practicable after receipt of the request.

How we share your personal information

Sharing personal information with third parties

We may seek and use personal information about you from, and use or disclose personal information about you to, third parties in relation to or in connection with the potential or actual rental of a property, the sale and purchase of a property or other business or administrative functions for the real estate and/or strata agency. These third parties may include

- your representatives, attorneys, lawyers, settlement agents, accountants, brokers;
- any conjunction, co-listing, buyers' or other property agents that acts on your behalf in connection with the rental, leasing, sale and purchase of property;
- auctioneers;
- your financier including any mortgage brokers that may be assisting you with any existing mortgage loan or application in relation to the sale or purchase of property;
- valuers, surveyors, insurers, re-insurers, claim assessors and investigators;
- financial institutions including deposit taking institutions;
- if you are a tenant, including any prospective tenant, your referees, including your employer or other individuals to confirm your identity and/or other details about you in any rental application that you submit;
- organisations in and associated with debt collecting;
- law enforcement agencies;
- government and/or regulatory bodies including (without limitation) the NSW Land and Property Management Authority, Australian Taxation Office, the NSW Office of State Revenue. In many cases, these organisations may share information with foreign authorities;
- mailing houses and telemarketing agencies that assist us to communicate with you;
- if we enter into, or propose to enter into, any agreement or arrangement with any party for the purpose of, or in connection with, the acquisition of our business (including any part of our business that includes personal information), that party (including its legal, financial and other professional advisers) to provide personal information in relation to or in connection with those arrangements; and
- service providers including IT and data consultants, agents, contractors and advisers that assist us to conduct our business.

Sharing personal information with related companies

We may share personal information about you with our related companies for any of the purposes described above.

Sharing personal information outside of Australia

We may store information about you in cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries through an internet connection it is not always practical to know in which country personal information about you may be held.

We will take reasonable steps to ensure that any overseas organisation that receives your personal information will comply with the Act.

If you do not provide personal information

If you do not provide your personal information to us, it may not be possible to provide you with the service that you have requested or applied for, for example

If personal information is not disclosed in a rental application by a prospective tenant, then we may be unable to process the application and/or submit it to the landlord for their consideration or approval. If you enter into a rental or lease agreement, you will need to be identified and your personal information will be included in the rental or lease agreement;

- if personal information is not disclosed by a vendor in connection with the sale of their property, we will not be able to verify that they are the owner of the property and/or to advertise and market the property;
- if personal information is not disclosed by a prospective purchaser at an open inspection, then we may not be able to admit them into the inspection;
- if personal information is not disclosed by a prospective purchaser at an auction, then we will not be able to register them as a bidder;
- if personal information is not disclosed by an owner in connection with the management of their strata scheme or their property, then we will not be able to verify that they are the owner of the property and manage the strata scheme;
- if personal information is not disclosed and we cannot comply with our AML/CTF Obligations we may not be able to provide any services; and
- to let you know about other services we provide that might be suitable for your needs (unless you opt out of this by telling us that you do not wish to receive such information).

Personal information about other people

If you give us personal information about any other person in relation to, or in connection with, the rental/lease or sale of any property:

- we are entitled to assume that you have sought their consent to the disclosure of such personal information to us;
- we have collected their personal information for the purposes set out in this Privacy Policy;
- we may exchange their personal information with other organisations for the purposes set out in this Privacy Policy;
- we will handle their personal information in the same way as set out in this Privacy Policy and they can:
 - access or request a copy of this Privacy Policy; or
 - access the personal information we hold about them.

Anonymity and pseudonymity

We are not always able to deal with people who do not wish to identify themselves. This will be particularly the case when we are proposing to, or we do, act for a vendor or a landlord in relation to either the sale or rental/lease of any property. This will also apply where we are also dealing with actual or prospective tenants for any rental property that we manage.

Further, we are not able to allow people through any property inspections who do not wish to identify themselves as this can create security and other concerns for the property owner (among other considerations).

However, where possible, we can provide information of a general nature such as, for example, we can respond to general telephone and related enquiries about a rental/lease or sale property to unidentified individuals. Of course, if an individual makes an enquiry by email or other electronic or written methods then there is every possibility that the mode of communication may identify you

Information security

We take reasonable steps to protect all information which we hold (including any personal or sensitive information) from misuse, loss, unauthorised access, modification or disclosure.

Marketing and opt-out

We may also use the information, including personal information (excluding sensitive information), provided by you for marketing and research purposes, to analyse and improve products, services and benefits and to inform you of products, services and benefits provided by us, our related entities, suppliers or sponsors (including specifically CGU Insurance Limited (ABN 27 004 478 371) (**CGU**) or a related body corporate of CGU) [which we consider may be of value or interest to you, unless you tell us (see the marketing opt-out

below), or have previously told us not to. We will not use your sensitive information for these purposes without your consent

Accessing your Personal Information

Unless we are entitled to withhold access to your personal information (there are various reasons why this may be the case), you have the right to request access to any personal information held by us which relates to you. We may charge a reasonable fee where access to personal information is provided. Any requests for access to your personal information should be made in writing to the Privacy Officer (details specified below). You also have the right to request the correction of any personal information which relates to you that is inaccurate, incomplete, irrelevant, misleading or out-of-date.

If you require any further information about our management of personal information or have any queries or complaints, you should contact:

The Privacy Officer

East Coast Getaways Property Group
3/263 The Entrance Road
The Entrance NSW 2261

The Office of the Information Commissioner can be contacted as follows:

Phone enquiries	1300 363 992 Mon–Thurs 10am–4pm AEST/AEDT		
Online enquiries	Enquiry form		
Post	GPO Sydney NSW 2001	Box	5288
Fax	+61 2 9284 9666		