



RED23 PRIVACY POLICY

Red23 Pty Ltd is an independent property sales and marketing company focusing on project sales and marketing, residential property developments and land acquisitions and sale.

We act as a real estate agent for landowners, property developers and project managers in the selling of property products, including land lots, house and land packages and medium density residences.

1. INTRODUCTION

1.1 In the course of our business activities, Red23 Pty Ltd collect personal information. This privacy policy has been developed to ensure that information is managed properly.

1.2 Red23 Pty Ltd recognises and acknowledges the importance of ensuring that the confidentiality and privacy of those with whom we have professional and business dealings, is appropriately maintained.

1.3 Red23 Pty Ltd is committed to protecting the privacy and confidentiality of personal information it collects from its clients, service providers, contractors, and other parties.

1.4 This statement sets out our policy relating to the collection, use and disclosure of personal information. Our policy complies with the legislative requirements set out by the Privacy Amendment (Private Sector) Act 2000; particularly the National Privacy Principles and is consistent with our obligations under the Estate Agents Act 1980 (Vic).

1.5 This privacy policy also includes our policy on managing credit information (see section 6).

Scope

1.6 This policy applies to any person for whom we currently hold, or may in the future collect and/or hold personal information.

1.7 This policy applies to all Red23 Pty Ltd employees and extends and applies to all contractors and/or consultants working for, or on behalf of Red23 Pty Ltd.

1.8 This policy applies to personal information. 'Personal information' is information or an opinion about an identified individual or an individual who is reasonably identifiable.

2. TYPES OF PERSONAL INFORMATION WE COLLECT AND HOLD

2.1 The personal information we collect and hold can include:

- (a) contact information such as name, address, city, postcode, email address(s) and telephone and mobile number;
- (b) demographic information such as date and place of birth; gender; marital status; current and past employment details and purchase/rental history;
- (c) details regarding your property preferences and objectives;
- (d) credit related information such as investment details; financial information; credit information and banking details;
- (e) any other personal information required to assist us in establishing a customer and/or business profile to provide real estate services more efficiently.

2.2 We do not generally collect sensitive information without the individual's consent unless permitted under the Privacy Act.

3. PERSONAL INFORMATION CACHE

3.1 Our standard approach to collecting personal information is by co-operating directly with you.

3.2 Additionally, we may also collect certain information in other ways. For example:

- (a) from electronic queries, registration forms, expression of interest forms and database subscriptions;
- (b) from responses to questions regarding products or services to Red23 staff;
- (c) through referrals and business development events;
- (d) through marketing (including direct marketing);
- (e) from paid search providers; and
- (f) website cookies and third parties.

3.3 You may select not to accept cookies on your browser. This should not adversely affect your experience when visiting our website.

3.4 Our usual approach to holding personal information includes:

- (a) physically at our offices (securely); and
- (b) electronically on secure online servers and software, CRM database and third party software providers.

3.5 We secure the personal information by:

- (a) scanning all documents into our secure database and returning originals or destroying copies;
- (b) using secure archiving for some documents;

- (c) using secure servers to store personal information; and
- (d) using unique usernames, passwords and other safeguards on systems that can access personal information.

3.6 We manage the personal information we collect by:

- (a) implementing procedures for identifying and managing privacy risks;
- (b) implementing security systems for protecting personal information from misuse, interference and loss from unauthorised access, modification or disclosure;
- (c) providing staff with training on privacy issues and implementing mechanisms to ensure any agents or contractors who deal with us comply with the APPs;
- (d) implementing procedures for identifying and reporting privacy breaches and for receiving and responding to complaints;

3.7 We take reasonable steps to destroy or permanently de-identify personal information if that information is no longer needed for the purposes for which we are authorised to use.

4. WHY WE COLLECT, HOLD, USE OR DISCLOSE PERSONAL INFORMATION?

4.1 The primary purpose for which information is collected is generally to provide our products to you or your business, assess any application for credit, or evaluate your suitability for employment.

4.2 We collect, hold, use or disclose personal information for any of the following services to you or your business (services):

- (a) for project marketing purposes;
- (b) to assist in the sale and marketing of land and medium density developments;
- (c) to assist in acquiring and selling residential, industrial and commercial development sites;
- (d) to assist in determining residential development and investment opportunities;
- (e) for investing in property development projects; and
- (f) delivering corporate advisory services, asset management and project management services, or any other service in connection with our business.

4.3 In the case of builder partners, the primary purpose the information is collected to assist us in creating partnerships to perform services.

4.4 Personal information may be used or disclosed by us for secondary purposes which are within your reasonable expectations and which are related to the primary purpose of collection. For example:

- (a) to invite you to events;

- (b) to provide you with sales and product updates that are relevant to you or your business;
- (c) to provide you with tailored market offers, products and incentives;
- (d) to provide you with information on other initiatives undertaken by us, including financial services;
- (e) to assist in our customer reporting, so we can provide you with enhanced customer service; and
- (f) for research purposes.

4.5 We may disclose personal information to:

- (a) landowners and developers;
- (b) potential buyers, tenants, landlords and referees;
- (c) tradespeople, property inspection consultants and bodies corporate;
- (d) financial institutions and government bodies;
- (e) external auditors and professional advisers;
- (f) other service providers or referral partners in order to provide the Services to you, or to assist our functions or activities (such as law firms);
- (g) other third parties such as direct marketing agencies, and sales, rental and investment consultants and project managers;
- (h) third party technology providers, such as our CRM database provider; and
- (i) any other third parties incidental to us carrying out our functions as a professional real estate agency.

4.6 Our website may contain links to other websites with whom we have an association. This may include residential project websites for which we are the marketing and selling agent, clients' websites and industry related websites with whom we have an association but not controlled by Red23 Pty Ltd or covered by this Privacy Policy. It should be noted that these websites may have a different privacy policy to our website, and you should check the privacy policies on their respective websites.

4.7 Otherwise, we will only disclose personal information to third parties if permitted by the Privacy Act.

5. PERSONAL INFORMATION DISCLOSURE OUTSIDE AUSTRALIA

5.1 From time to time Red23 Pty Ltd may disclose information to overseas recipients if it is necessary to providing the Services.

5.2 Red23 Pty Ltd take reasonable steps to ensure that the recipient provides commitment to privacy and confidentiality which are at least equal to the APPs or the recipient is subject to privacy protection laws that offer at least the same level of protection as required under the Privacy Act in Australia.

6. MANAGEMENT OF CREDIT INFORMATION

6.1 As a real estate agent, Red23 Pty Ltd is not a 'credit provider' for Privacy Act purposes.

6.2 However, in the course of providing products and services to you and evaluating your suitability for credit, we may collect and hold the following credit information:

- (a) your identification and information about any credit that has been provided to or by you;
- (b) your repayment history and information about your overdue payments;
- (c) terms and conditions of your credit arrangements;
- (d) initiated court proceedings against you in relation to your credit activities;
- (e) any publicly available information about your credit worthiness;
- (f) information about your bankruptcy, debt agreements or any fraudulent or serious credit infringement committed by you.

6.3 In most circumstances we will only collect credit information about you if you disclose it to us and it is relevant in providing you with our products and services and our provision of them to you.

6.4 In some circumstances we may collect credit information from credit reporting bodies. We store and hold credit information in the same manner as outlined in section 3 of this policy.

6.5 We may also collect the credit information to process payments, assess your eligibility for credit, for direct marketing purposes or for other purposes incidental to our supply of products or services to you.

6.6 We will not disclose your credit information to entities without an Australian link unless you expressly request us to, it is in connection with the Services, or stored through any of our software platforms.

6.7 You can access and correct your credit information, or complain about a breach of your privacy in the same manner as set out in section 8 of this policy.

7. ACCESSING YOUR PERSONAL INFORMATION

7.1 It is important that the information we hold about you is up-to-date. You should contact us if your personal information changes.

7.2 You may request access to the personal information held by us or ask us for your personal information to be corrected by using the contact details in this section.

7.3 We will grant you access to your personal information as soon as possible, subject to and in accordance with the Privacy Act.

7.4 In keeping with our commitment to protect the privacy of personal information, we may not disclose personal information to you without proof of identity.

7.5 We may deny access to personal information if:

- (a) the request is unreasonable and providing access would have an unreasonable impact on the privacy of another person;
- (b) providing access would pose a serious and imminent threat to the life or health of any person;
- (c) providing access would compromise our professional obligations; or
- (d) there are other legal grounds to deny the request.

7.6 We may charge a fee for reasonable costs incurred in responding to an access request. The fee (if any) will be disclosed prior to processing.

7.7 If the personal information that we hold is not accurate, complete and up-to-date, we will take reasonable steps to correct it so that it is accurate, complete and up-to-date, where it is appropriate to do so.

8. COMPLAINTS

8.1 If you believe there has been a breach of your privacy you may make a complaint in writing by using the contact details below. We will have a reasonable time to respond to the complaint.

8.2 In the unlikely event the privacy issue cannot be resolved; you may take your complaint to the Office of the Australian Information Commissioner.

9. CONTACT US

9.1 Red23 Pty Ltd welcomes your comments regarding this Privacy Policy. If you have any queries or require additional information about this policy or our practices, please contact our Operations Manager by any of the following means during business.

Red23 Pty Ltd
Unit 1, 15 Ricketts Road,
Mt Waverley VIC 3149
Ph: (03) 9540 0477
Email: info@red23.com.au

10. CHANGES TO THIS POLICY

10.1 Red23 Pty Ltd reserves the right to update, modify or remove this policy at any time without prior notice. Any changes to the privacy policy will be published on our website.