

Aware Real Estate Privacy Policy

This Privacy Policy is for Aware Real Estate and its related entities; collectively referred in this policy as the Group. This policy outlines how personal information is collected, held, used, and disclosed, and provides information on your rights regarding your personal information.

We respect your privacy.

September 2022

1. Our Privacy Commitment

This Privacy Policy applies to the collection, use, disclosure and handling of personal information by Aware Real Estate Management Pty Ltd ABN 77 653 940 295 and their related corporate entities (collectively “we” or “us”), including personal information collected via our websites. It explains the way in which we handle personal information collected in connection with the provision of goods and services. We are committed to protecting the privacy of individuals and are bound by the Australian Privacy Principles set out in the Privacy Act 1988 (Cwth) (“Act”). We will only collect, use or disclose personal information, in accordance with the Act, the Code and this Privacy Policy.

2. What personal information we collect

We collect personal information including sensitive personal information about you in the course of our dealings with you.

Personal information

Personal information is any information or opinion about an individual who is reasonably identifiable. We collect and hold personal information about our customers, tenants, contractors, agents and other third parties. We may collect and hold the following types of personal information from you:

- a.** contact information such as name, address, email address and phone number if you are a prospective or current tenant or a guarantor, information about previous property transactions and dealings you have had with us;
- b.** records of communications between us (whether through our help desk, in person, through our websites, via social media or otherwise), including information from enquiries you have made;
- c.** education and employment history if you are seeking employment with us; and
- d.** publicly available information that is relevant for our business purposes such as ASIC searches.

Sensitive personal information

We may also collect sensitive personal information from you, if you provide contractual services to us or if you apply for employment with us, such as your criminal record and test results under our drug and alcohol management plan.

Unless permitted by law, sensitive information would only be collected with your consent.

3. How we collect your personal information

Generally, we will only obtain personal information from you or in the course of our dealings with you, for example:

- a. when you provide personal information to us;
- b. when entering into commercial or other transactions and arrangements with you, including service agreements and lease agreements;
- c. when you provide your information to us through our websites or services;
- d. when you contact and correspond with us, for example to ask for information or provide other feedback to us; and
- e. when you seek employment with us

We may also collect personal information from third parties such as law enforcement agencies and other government entities but only in accordance with the Act.

Cookies

We use Google Analytics for website traffic and data reporting to measure how users interact with our website. As a user navigates between web pages, Google Analytics provides website owners JavaScript tags (libraries) to record information about the page a user has seen, for example the URL of the page. The Google Analytics JavaScript libraries use HTTP Cookies to “remember” what a user has done on previous pages / a user’s interactions with the website, but does not collect any personal information about the website user. You can opt out of the collection of this information by disabling cookies through your web browser, however you may not be able to use all our website features if you do so.

4. The purposes for which we collect your personal information

We collect, hold and use personal information for a variety of reasons including to:

- i. provide services and products to our customers;
- ii. manage our relationships with our tenants, suppliers and stakeholders;
- iii. answer your inquiries and deliver customer service;
- iv. tell our customers and prospective customers about other products, services or promotional offers that we think may be of interest to them;
- v. carry out competitions and promotions;
- vi. maintain and improve our customer service;
- vii. meet our regulatory and legal obligations;
- viii. manage and resolve any legal or commercial complaints and issues;
- ix. carry out internal functions including training;
- x. conduct marketing research and analysis; and
- xi. assess your application for employment with us.

We may also use your information for other purposes required or authorised by or under law, including purposes for which you have provided your consent.

5. In what circumstances will we disclose your personal information?

In the course of conducting our business and providing our products and services to you, we may disclose your personal information. In particular, your personal information may be shared between our businesses for the purposes outlined in this policy.

We may also disclose your personal information if you have provided your consent or where permitted by law) to, where appropriate:

- a. professional advisers (such as lawyers or auditors);
- b. our contracted service providers, including:
- c. information technology service providers;
- d. payment systems operators and financial institutions;
- e. debt collection agencies, if we have provided credit to you;
- f. organisations authorised by us to conduct promotional, research or marketing activities;
- g. your referee, if you have applied to work for us as an employee or contractor;
- h. potential guarantors;
- i. a person or organisation proposing to purchase the whole or part of our business;
- j. law enforcement agencies or government authorities; and
- k. any persons acting on your behalf including those persons expressly nominated by you.

We may disclose your personal information to third parties for other purposes required or authorised by or under law, including purposes for which you have provided your consent. In all circumstances where your personal information is disclosed, we will take all steps reasonable to ensure that these third parties undertake to protect your privacy, whether contractually or otherwise.

We will not sell, transfer or otherwise provide your personal information to any other party other than in accordance with the Act. We do not, in the usual course of our business, store, process or otherwise disclose personal information outside Australia.

6. Direct marketing

We will use your personal information only for the purposes of our normal business dealings and in accordance with the Australian Privacy Principles. This may include adding you to one of our mailing lists, whether for hard copy or electronic mail, to keep you informed of our business developments. Each marketing communication from us will include information about how you may unsubscribe from our mailing lists. If you advise us that you do not want marketing material, we will carry out your request within 30 days after your request is made. We do not use your credit eligibility information for the purposes of direct marketing.

7. Access to information

You have a right to request access to and seek correction of your personal information (including credit information or credit eligibility information) held by us. If you wish to access, correct or update any such information, please contact our office at the provided address below. We will respond to your request within 30 days.

We may refuse access to the information where the Act or Code allows us to do so, such as where granting access to the information may jeopardise the privacy of another individual. Where access is granted we may charge a reasonable fee to cover the costs of providing access to you, such as where it takes a significant amount of time to locate the information.

We rely on the personal information we hold in conducting our business. Therefore, it is very important that the information we hold is accurate, complete and up to date. If you believe that your personal information (including credit information or credit eligibility information) is inaccurate, incomplete, out of date, or irrelevant or misleading, please contact our Privacy Officer using the details provided below and we will take reasonable steps to correct that information.

8. Storage and security of your personal information

We may hold your personal information (including credit-related information) in either electronic or hard copy form. We use safeguards such as controlled premises, secured electronic databases and internet firewalls to ensure your personal information is protected from misuse or loss, or from unauthorised access, modification or disclosure.

If we no longer require your personal information for any purpose detailed in this Privacy Policy and we are not legally required to retain that personal information then we will take all reasonable steps to either destroy or de-identify the personal information.

9. Changes to this Privacy Policy

This Privacy Policy may be amended from time to time. The current version will be updated on this website.

10. Complaints

If you have any questions or concerns about our privacy practices under the Privacy Act or the Code, please contact our Office as set out below. We take all issues and concerns raised about our privacy practices very seriously and will respond to all complaints within 30 days. Please note, however that if we require further information for investigation purposes, we may take longer than 30 days to respond to your complaint.

If you consider your privacy concerns have not been resolved satisfactorily by us or you wish to obtain further information on privacy requirements, you may contact the Office of the Australian Information Commissioner on 1300 363 992.

11. Contact information

If you would like any further details about our Privacy Policy or would like us to send you a copy of this policy, please contact our Head Office as follows:

Office Manager
Aware Real Estate

Postal Address:
GPO Box 4456
Sydney NSW 2001

Em.info@awarerealestate.com.au