

## **PRIVACY POLICY**

SJG Vested Pty Ltd (CAN 616 525 065) (CBD Realty) are committed to respecting your right to privacy and protecting your personal information.

The Queensland Information Privacy Act 1988 (Cth) (Privacy Act) provides a right for individuals to have their personal information collected and handled in accordance with the Act.

We will ensure that all employees and subcontractors are aware of and understand their own obligations under the Act. We will achieve this through the provision of training and through maintaining and implementing internal policies and procedures to prevent personal information from being collected, used, disclosed, retained, accessed or disposed of improperly.

This Policy applies to all your dealings with us, whether in person, or via telephone, email, correspondence or our website.

The purpose of this Policy is to:

- Give you a better and more complete understanding of the kinds of personal information we collect and hold;
- Clearly and concisely communicate how and when we collect, disclose, use, store and otherwise handle personal information;
- Inform you about the purposes for which we collect, hold, use and disclose personal information;
- Provide you with information about how you may access your personal information, and seek correction of your personal information;
- Provide you with information about how you may make a complaint, and how we will deal with any such complaint;
- Advise you of the circumstances in which we are likely to disclose personal information to overseas recipients; and
- Enhance the transparency of our operations.

***Personal information*** means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not.

### **Collection of Personal Information**

Whenever you deal with CBD REALTY, we will collect personal information in order to provide or prospectively provide, services and products to you. Such services and products include:

The types of personal information we generally collect includes but is not limited to:

- Name.
- Date of birth.
- Residential address.
- Business address.
- Postal address.
- Email address.
- Home telephone number.
- Work telephone number.
- Mobile telephone number.
- Names of your employees.
- Your occupation and business address.
- Financial information including names of banks or financial institutions.
- Bankruptcy information and credit reporting information.
- Bank account information and credit card details

- Insurance related information including (but not limited to) professional indemnity insurance details.

We will not ordinarily ask you to provide sensitive information however, we will only collect sensitive information in circumstances where:

- It is reasonably necessary for one or more of the services we provide or functions we carry out; and
- You consent to the collection of the information; or
- We are required or authorised by law to collect the sensitive information.

We will, if it is reasonable or practicable to do so, collect your personal information directly from you. This may happen when you fill out a form or when you give us personal information in person, or via telephone, email, correspondence or our website.

Sometimes we will collect personal information from a third party or a publicly available source. For example, we may need to collect personal information from a credit reporting agency.

If we receive personal information that we did not solicit, we will determine as soon as reasonably practicable whether we could have lawfully collected that information as part of our functions or activities. If we are not satisfied that we could have lawfully collected the information, then we will (if it is lawful and reasonable) destroy the information or ensure that it is de-identified.

You may choose to deal with us anonymously or under a pseudonym where lawful and practical. Where anonymity or use of a pseudonym will render us unable to provide the relevant service or do business, we may request that you identify yourself.

#### **Use and Disclosure of Personal Information**

Personal information collected by CBD REALTY from their clients, prospective clients, attendees at rental and property open for inspections, as well as visitors to the CBD Realty website located at <http://www.justusrealty.com.au> (CBD Realty Website) will ordinarily be used for the purpose to provide you with our services which include real estate services connected with buying, selling and leasing properties (commercial and residential as well as holiday homes) and responding to your requests, questions and comments.

In order to achieve the purposes described above, we may disclose your personal information to the persons/organisations described below:

- Our mediators and Tribunal representatives if you utilise our complaint resolution processes.
- Your legal advisor(s) and other relevant third parties involved in or relevant to a complaint referred to Us for investigation and resolution.
- Your financial institution.
- Persons or organisations involved in providing, managing or administering products or services, including independent contractors engaged by us as trainers or to provide us with a required service or product.
- Organisations involved in maintaining, reviewing and developing our business systems, procedures and infrastructure including maintaining or upgrading our computer systems.
- Persons or organisations involved in commercial negotiations with our business.
- Organisations involved in payments systems including financial institutions, merchants and payment organisations.

We will only use and disclose personal information for the primary purpose for which it was initially collected, or for purposes which are directly related to one of our functions or activities.

We will not disclose your personal information to government agencies, private sector organisations or any third parties unless one of the following applies:

- You have consented.
- You would reasonably expect, or you have been told, that information of that kind is usually passed to those individuals, bodies or agencies.
- It is otherwise required or authorised by law.
- It is reasonably necessary for enforcement related activities conducted by, or on behalf of, an enforcement body (eg. Police).

Personal information provided to CBD REALTY may be shared with its related companies. We will take all reasonable and practical measures to keep such information strictly confidential.

Like many other businesses in Australia, CBD REALTY may rely on third party suppliers or contractors to provide specialised services such as web hosting, cloud computing technology and data storage services. If personal information is provided to these suppliers and contractors in order to enable them to perform the agreed tasks, we will make every effort to ensure that the supplier or contractor handles the personal information in accordance with the Act and the Australian Privacy Principles. We will also require all suppliers and contractors to provide privacy undertakings and enter into confidentiality agreements.

### **Non personally identifiable information**

We sometimes collect data that, in and itself, does not directly identify you. We may collect, use, disclose and transfer this non personally identifiable information for any purpose. For example, we or our partners may collect information about your visits to our website, the links and advertisements that you click on and the URL that referred you to our website. We and/or such third parties with whom we may contract may use this information to serve you or like-minded customers with advertisements relating to other products, programs or services.

### **Accuracy of Personal Information**

CBD REALTY will take reasonable steps to ensure that all personal information it collects, uses or discloses is accurate, complete and up-to-date.

If you believe your personal information is not accurate, complete or up-to-date, please contact us (see the Contacting Us section for more information).

### **Security**

Your personal information may be stored in hard copy documents or electronically. CBD REALTY is committed to keeping your personal information secure and safe. Some of the ways we do this are:

- Requiring employees and contractors to enter into confidentiality agreements.
- Secure hard copy document storage (i.e. storing hard copy documents in locked filing cabinets).
- Security measures for access to our computer systems.
- Providing a discreet environment for confidential discussions.
- Access control for our buildings.
- Security measures for our websites (see the Your Privacy on the Internet section for more information).
- Anti-spam, anti-virus and anti-malware software
- Secure server room with access limited to authorised personnel

We will review and update our security measures from time to time.

In addition, we will review the personal information and sensitive information held by us from time to time, ensuring that information which is no longer needed for a purpose for which it was initially collected is destroyed or de-identified.

### **Your Privacy on the Internet**

CBD REALTY takes care to ensure that the information you provide to us via our website is protected. For example, our website has electronic security systems in place, including the use of firewalls and data

encryption in relation to shopping cart functions.

You may be able to access external websites by clicking on links we have provided. Those other websites are not subject to our privacy standards, policies and procedures. You will need to contact or review those websites directly to ascertain their privacy standards, policies and procedures.

### **Access to Personal Information**

You may request access to personal information that CBD REALTY holds about you (see the Contacting Us section for more information).

We will acknowledge your request within 14 business days of the request being made. Access will usually be granted within 14 business days of our acknowledgment or, if the request involves complex considerations or voluminous photocopying or scanning, we will contact you to provide an alternative timeframe based on the circumstances and anticipated work involved.

You will need to verify your identity before access to your personal information is granted.

Once your request has been processed by CBD REALTY, you may be forwarded the information by mail or email or you may personally inspect it at the location where the information is held or another appropriate place. Whenever possible, we will endeavor to make the information available to you in the manner requested by you unless it is unreasonable for us to do so (eg. if you have asked for the information to be emailed to you, we will endeavour to email the information to you. If the file size would be too large, we may send you the information by hard copy instead of email).

If you are aware that we hold personal information about you that is no longer accurate, complete or up-to-date, please contact us (see the Contacting Us section for more information).

If you request access to your personal information, or if you request that we correct your personal information, we will allow access or make the correction unless we consider that there is a sound reason to withhold the information, or not make the correction.

### **Contacting us**

You may contact us by mail, email or telephone as follows:

Mail:

PO Box 2758  
BUNDABERG CENTRAL QLD 4670

Email:

info@cbdrealty.com.au

Phone:

(07) 4196 0933

### **Complaints**

If you consider that there has been a breach of the Australian Privacy Principles, you are entitled to complain to CBD REALTY (see the Contacting Us section for more information).

We will acknowledge receipt of a complaint within 2 business days.

We will investigate the complaint and attempt to resolve it within 5 business days after the complaint was received. Where it is anticipated that this timeframe is not achievable, we will contact you to provide an estimate of how long it will take to investigate and respond to the complaint.

### **Review**

This policy is to be reviewed as follows:

- Following an information security incident.
- Following significant changes to our systems.
- Following changes to the relevant State and Commonwealth legislation

Reviews are to examine the appropriateness of the policy taking into consideration corporate, system and compliance requirement changes since the last review was undertaken.

### **Privacy Policy Updates**

CBD REALTY reserves the right to change this Policy at any time and any amended Policy is effective upon posting to our website. The CBD REALTY will make every effort to communicate any significant changes to you via email or via our CBD REALTY updates. Your continued membership of CBD REALTY and use of our services will be deemed acceptance of any amended Policy.

*July 2019*