

Preamble

This Privacy Policy sets out how we manage personal information provided to or collected by us. We may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment.

About this Policy

Your privacy is important to us. This is our Privacy Policy, and it sets out how Micourt Pty Ltd ACN 003 212 771, Living Better # 1 Pty Ltd ACN 163 896 026 and Group Collective Pty Ltd ACN 663 994 349 together trading as Chapman Real Estate and our related entities (**We, Us, and Our**) collect, use and disclose your personal information.

We are bound by the Australian Privacy Principles (**APPs**) contained in the *Privacy Act 1998* (Cth) (**the Act**).

The principles are designed to protect the privacy of individuals by regulating the way personal information is managed by Australian businesses. Personal information is any information that allows an individual to be personally identified.

We are bound by and acknowledge the importance of the Notifiable Data Breach Scheme, which has been addressed by Us in Our Data Breach Response Plan.

You do not have to provide Us with your personal information. However, if you do not, We may not be able to provide you with information, services or products you request or important notices in relation to Our provision of and your use of Our products or services.

By visiting Our website, applying for, or using any of Our services or providing Us with your information, you agree to your information being collected, held, used, and disclosed as set out in this Privacy Policy.

What personal information do we collect and hold?

We collect information about you and your interactions with us, for example, when you use any of our products or services, call us, or otherwise visit our website. The information we collect from you may include your identity and contact details, your history of purchases and use of our products and services and details of enquiries or complaints you make.

We may collect information about how you access, use and interact with the website. We do this by using a range of tools such as Google Analytics or any other software/program/platform that we use. This information may include:

- the location from which you have come to the site and the pages you have visited;
- technical data, which may include IP address, the types of devices you are using to access the website, device attributes, browser type, language and operating system;
- your name;
- your address;
- email address;
- telephone number;
- date of birth;
- signature;

- customer records, and
- banking information

Additionally, if you choose to engage in our services, as the vendor, buyer, landlord, tenant or in any other capacity we offer our services we may be required to collect further information which includes, but is not limited to the following:

- your name, DOB, gender, age, residential or business address, telephone number, email address;
- company name, directors, address, telephone number, email address, website address,
- ABN/ACN, ASIC company search;
- resume, employment history, references, qualifications;
- banking details;
- photo identification (driver's licence, passport, Student ID card)
- real estate licence, certificate and CPD details
- membership certificates
- computer software and anti-virus certificates
- information relating to a will or estate (power of attorney);
- proof of ownership (utility bills);
- government identification details (medicare card, electoral enrolment card or proof of enrolment), including to comply with any obligations we may have in relation to the AML/CTF Act, regulations or the Anti-Money Laundering and Counter-Terrorism Financing Rules;
- registered title particulars; title search, title reference;
- registered dealings (for example, mortgages, leases, any other registered on title);
- list of inclusions;
- other information included in the standard pages of the contract of sale;
- community title search;
- council zoning certificate, council order;
- sewer diagram and service location details;
- required dealings;
- residential tenancy agreement;
- insurance details;
- pest and building reports, survey's, property valuations, termite inspections;
- strata plans and details;
- financial services report;
- property for sale address and details inclusive of photos and particulars of the property/land;
- if the property has a swimming pool, the swimming pool register entry and compliance certificate or non-compliance

- any document relating to, in on connection with, the property you are intending to sell, lease or purchase
- investment property address;
- residential tenancy agreement;
- TICA checks, rental history;
- employment history, payslips, profit and loss statements;
- photographs and information of properties;
- correspondence and notes.

We may also collect and hold other information required to provide services or assistance to you, including your emergency contact details, sensitive information, and information necessary to assess your creditworthiness.

How do we use personal information?

We only use your information for the purpose for which it was provided to Us, related purposes that you would reasonably expect and as permitted or required by law. Such purposes include:

- responding to your inquiries;
- to contact you, either by calling you on your telephone number, email or post/courier/mail for example, to respond to your queries or complaints, or if we need to tell you something important
- maintaining/administering your account and processing payments you have authorised;
- communicating with you about works that may affect your premises;
- processing your survey or questionnaire responses for the purpose(s) notified in the survey or questionnaire (where you have chosen to participate);
- for market research and programs so that We can improve Our services and meet Our customers' needs;
- analysing broader market trends and demographics so that We may best serve Our customers in the future;
- providing you with marketing information regarding other products and services (of Ours or of a third party) which We believe may be of interest to you, but not if you have opted out from receiving such information;
- reporting to Our owners or their shareholders;
- quality assurance and training purposes;
- in the ordinary course of conducting Our business. For example, supplying services such as assisting with purchasing, selling or leasing properties,, acquiring products and services, connecting utility services when you authorise or request Us to do so, responding to your enquiries and feedback, and providing information about Our events, news, publications and products and services that may be of interest to you;
- to comply with any obligations we may have under the AML/CTF Act, regulations or the Anti-Money Laundering and Counter-Terrorism Financing Rules;

- performing general administration, reporting and management functions. For example, invoicing and account management, payment processing, risk management, training, quality assurance and managing suppliers;
- to provide relevant and up to date information to employees, contractors and service providers who assist in the operation of our business
- employment-related purposes, such as recruiting and providing services to staff;
- as part of a sale (or proposed sale) of all or part of Our business;
- other purposes related to or in connection with Our business, including meeting Our legal and contractual obligations to third parties and for internal corporate governance purposes; and
- any other purposes identified at the time of collecting your information.

If you do not provide us with your personal information, we may not be able to provide you with our services, communicate with you or respond to your enquiries.

Information containing personal information is subject to strict legal and regulatory obligations which requires an organisation to take reasonable steps to destroy or de-identify personal information it holds once the personal information is no longer needed for any purpose for which it may be used or disclosed under the APPs, subject to law or court order to retain the personal information.

If you provide your email address, telephone and/or mobile phone number, you also consent to us using your email address, telephone and/or mobile phone number to contact you (including by telephone call, SMS or email) for any of the above purposes.

How We disclose your information

We may disclose your information to Our related entities, third parties who provide services to you, or to Us or on Our behalf, including:

- government bodies, regulators, law enforcement agencies and any other parties where required or otherwise permitted by law;
- other service providers where reasonably necessary, such as to cross check the accuracy of your contact details;
- Our related entities and third parties who provide services to Us, or to you on your behalf, including:
 - referees in the course of determining whether you are a suitable tenant;
 - lawyers or conveyancers in the course of assisting with the conveyancing process of your property;
 - another real estate agency for a referral where requested by you;
 - landlords in the course of assessing rental applicant details;
 - utility providers, tradespeople, insurance providers or building inspectors to ensure the maintenance and suitability of rental properties;
 - parties that help operate and maintain Our IT infrastructure and other business assets;
 - parties that manage customer accounts and billing;
 - parties that are Our business partners, joint venturers, strategic partners, or agents;
 - external IT service providers, infrastructure and other third party service providers;
 - mailing houses and marketing companies;

- as part of a sale (or proposed sale) of all or part of Our business. For example, We may disclose information to Our external advisers, to potential and actual bidders and to their external advisers;
- in the case of claims (or likely claims), assessors, repairers, builders, and investigators; and
- parties that assess creditworthiness or assist in recovery against you if you are in breach of your obligations; and
- other entities that may offer you related products or services if you have not opted out to receive such information.

We may also disclose your personal information to government agencies, Our service providers, agents, contractors, business partners and other recipients from time to time, only if one or more of the following apply:

- You have consented.
- You would reasonably expect Us to use or disclose your personal information in this way.
- We are authorised or required to do so by law.
- Disclosure will lessen or prevent a serious threat to the life, health or safety of an individual, or to public safety.
- Where another permitted general situation or permitted health situation exception applies.
- Disclosure is reasonably necessary for a law enforcement related activity.

We will only disclose your sensitive information for the purposes for which it was initially collected, other directly related purposes or purposes to which you consent.

If you are not a customer (for example, if you are a supplier or other third party), your information will only be used for the specific purpose for which it was provided to Us, unless you have consented to other uses.

We may disclose, and you consent to Us disclosing, your personal information among the entities that comprise Us and to any of Our related bodies corporate or related entities (as both are described in the *Corporations Act 2001* (Cth)) whether located in Australia or overseas. If We disclose your personal information to a Related Body Corporate, your information will be collected, stored, used, and disclosed in accordance with this Privacy Policy and the APPs.

How we collect your personal information

We will collect your personal information directly from you whenever you interact with us, including but not limited to, the following:

- through your access and use of our website;
- by telephone, letter, fax or email;
- during conversations between you and our representatives;
- by contracting with us or completing application forms;
- by entering competitions, promotions or requesting information or material from us; or
- completing surveys, providing feedback or complaining to us.

We may also collect personal information from third parties including, but not limited to, the following:

- Google;
- Facebook;
- from third party companies such as credit reporting agencies, law enforcement agencies and government entities;
- your representatives (lawyers, accountants and financial advisers);
- your employer; or
- publicly available sources of information or any other organisations where you have given your consent

We only collect personal information by lawful and fair means. By providing personal information to Us, you consent to Us collecting and storing this information as well as further information as may be provided by you in order that We may follow up your enquiries and best service your needs.

Whenever you choose to deal with Us directly, We will collect this information directly from you. However, there may be occasions when We collect your information from someone else. This may include contracted service providers, agents acting on Our behalf or related entities and/or anyone you have authorised to deal with Us on your behalf.

By subscribing to the forms on Our website, you are actively asking Us to supply you with information about Our services and We will do this through the method of contact provided by you, which may be phone or email.

On all occasions, your information is collected, held, used, and disclosed by Us in accordance with this policy and applicable Australian Privacy Principles.

We may also seek to collect information about someone else from you. However, you must not provide Us with information about another person unless you have clear consent from that person to do so, let them know about this Privacy Policy, and where to find it.

How we store and hold personal information

We store most information about you in computer systems and databases operated by either us or our external service providers. Some information about you is recorded in paper files that we store securely.

We implement and maintain processes and security measures to protect personal information which we hold from misuse, interference or loss, and from unauthorised access, modification or disclosure.

These processes and systems include:

- the use of identity and access management technologies to control access to systems on which information is processed and stored;
- requiring all employees to comply with internal information security policies and keep information secure;
- requiring all employees to complete training about information security; and
- monitoring and regularly reviewing our practice against our own policies and against industry best practice.

We will also take reasonable steps to destroy or de-identify personal information once we no longer require it for the purposes for which it was collected or for any secondary purpose permitted under the APPs.

Do we disclose personal information to overseas recipients?

We may disclose your personal information to recipients which are located outside Australia. Overseas recipients are generally located in the Philippines.

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.

Where appropriate, we use secure transmission facilities. However, no transmission of information over the internet can be guaranteed to be completely secure and we do not warrant the security of any information transmitted to us over the internet.

Do we use your personal information for marketing?

We will use your personal information to offer you products and services we believe may interest you, research purposes, analyse and improve products/services, benefits and services and to inform you of products, services and benefits provided by us, our related entities, suppliers or sponsors which we consider may be of value or interest to you, but we will not do so if you tell us not to. These products and services may be offered by us, our related companies, our other business partners or our service providers.

Where you receive electronic marketing communications from us, you may opt out of receiving further marketing communications by following the opt-out instructions provided in the communication.

Access to and correction of your personal information

You may access or request correction of the personal information that we hold about you by contacting us. Our contact details are set out below. There are some circumstances in which we are not required to give you access to your personal information.

There is no charge for requesting access to your personal information, but we may require you to meet our reasonable costs in providing you with access such as photocopying costs or costs for time spent on collating large amounts of material.

We will respond to your requests to access or correct personal information within a reasonable time and will take all reasonable steps to ensure that the personal information we hold about you remains accurate, up to date, complete, relevant and not misleading.

Cookies

We use cookies on the website. A cookie is a small text file that the website may place on your device to store information. We may use persistent cookies (which remain on your computer even after you close your browser) to store information that may speed up your use of our website for any of your future visits to the website. We may also use session cookies (which no longer remain after you end your browsing session) to help manage the display and presentation of information on the website.

You may refuse to use cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to use the full functionality of the website.

When users visit this website, our server may log certain information, including the type of browser and operating system the user is using, the top level domain name (for example .com, .net, .au, etc), the address of the referring site (for example, the previous site visited), the server's IP address, the date and time of visit and the address of the pages accessed and the documents downloaded. This information is generally only for internal statistical analysis and system administration purposes.

Any other information supplied to us (for example, if a user sends an email or enters any personal information into our website) is treated in accordance with this Privacy Policy.

GDPR

The General Data Protection Regulation (**GDPR**) relates to EU and UK residents' control over their Personal Data. It is a comprehensive law that provides greater data rights for individuals and requires organisations who control and process data to comply with data protection principles.

Personal Data means data that relates to an individual which, in isolation or in combination with other information, enables the individual to be identified directly or indirectly.

Where the GDPR applies with regard to any Personal Data We collect, then this section applies to that Personal Data. For the purpose of GDPR, We are the 'controller'.

If You are a resident in the EU or UK, you have the following rights with respect to your Personal Data, and can exercise them by sending a request to the Privacy Officer at privacy@chapmanrealestate.com.au or by phoning (02) 4739 6200. Those rights include:

- The right to be informed about the collection and use of your Personal Data at the time it is collected from you. This includes the purposes for processing your data, how long it will be kept for, and who it will be shared with.
- The right of access – you can obtain a copy of your Personal Data.
- The right to have your inaccurate Personal Data rectified or completed if it is incomplete. We must reconsider accuracy upon your request.
- The right to remove your Personal Data, aka 'the right to be forgotten'. This applies if the Personal Data is no longer necessary for the purpose which it was originally collected or processed for, or if you withdraw your consent and there is no other lawful basis for holding your data.
- The right to restrict processing. You can limit the way your data is used in the certain circumstances for instance, if you contest the accuracy of your Personal Data and We are verifying it.
- The right to data portability. A right to have your data moved, copied, or transferred easily from one IT environment to another securely and without affecting its usability. You can request direct transfer of your data to another controller.
- The right to object, in certain circumstances, to the processing of all or some of your Personal Data or for particular purposes.
- Rights in relation to automated decision making and profiling. You have a right to be informed of and to receive information about automated decision making and profiling of your data, and a right to request human intervention or challenge an automated decision.

Automated Decisions

We may use automated decision-making systems for the purposes to assist with tenant short listing and selection. Automated decision-making occurs when a computer program is employed to make, or perform an action substantially related to making a decision. Such a decision may significantly affect your rights or interests. In the operation of these computer programs, personal information about you may be used to make decisions or take actions that are directly and substantially related to making those decisions and the services We provide.

As part of this automated decision making process:

- The kinds of personal information used in the operation of such computer programs include name, contact details, credit history, salary and employment information.
- The kinds of decisions made solely by the operation of such computer programs may include eligibility of service, approval of application, short listing of application based on affordability criteria.
- The kinds of decisions for which a computer program may assist (but not completely decide), that is substantial and directly related to making the decision, made by the computer program may include processing applications, adjusting account settings, denying access, eligibility of service, approval of application, short listing of application based on affordability criteria.

Notification of Data Breaches

If We have reasonable grounds to suspect that a data breach has occurred, We will:

- complete an assessment of the suspected data breach within 30 days;
- if appropriate, take remedial action to address any potential harm to individuals that may arise due to a relevant data breach before any serious harm is caused to individuals to whom the information relates.

Where applicable, We will otherwise comply with privacy data breach notification requirements, including notifying affected individuals and the Office of the Australian Information Commissioner, as applicable.

Complaints

If you have a complaint about the way in which we have handled any privacy issue, including your request for access or correction of your personal information, you should contact us. Our contact details are set out below.

We will consider your complaint and determine whether it requires further investigation. We will notify you of the outcome of this investigation and any subsequent internal investigation.

If you remain unsatisfied with the way in which we have handled a privacy issue, you may approach an independent advisor or contact the Office of the Australian Information Commissioner (OAIC) (www.oaic.gov.au) for guidance on alternative courses of action which may be available.

Contact Details

If you have any questions, comments, requests or concerns, please contact us at:

The Privacy Officer

144 Great Western Highway Blaxland NSW 2774

Tel: (02) 4739 6200

Email: privacy@chapmanrealestate.com.au

Changes to this policy

From time to time, we may change our policy on how we handle personal information or the types of personal information which we hold. Any changes to our policy will be published on our website.

You may obtain a copy of our current policy from our website or by contacting us at the contact details above.

Version		Last updated
1		March 2024
2		March 2026