

# Privacy Policy

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Homestates Group and its related bodies corporate (“we”, “our” or “us”) respect and protect the privacy of individuals in relation to their personal information. We have developed sound privacy practices, procedures and systems for the management of personal information in accordance with the privacy obligations imposed by law. This privacy policy tells you how we collect and use information.

## 1. Open and Transparent Management of Personal Information

This Privacy Policy outlines our approach to the Australian Privacy Principles (APPs). It is our aim to manage personal information in an open and transparent way to comply with the APPs.

Any enquiries and complaints about this Privacy Policy should be addressed in writing, please refer to “Enquiries and Complaints” below.

This Privacy Policy is made available to you free of charge upon request.

## 2. Anonymity and Pseudonymity

You have the option of not identifying yourself or use a pseudonym when dealing with us in relation to a particular matter. However, this will not apply if we are required or authorised by an Australian law or court/tribunal order to deal with you who have identified yourself or it is impracticable for us to deal with you who have not identified yourself or used a pseudonym.

## 3. Collection of Solicited Personal Information

“Personal information” is information that can be used to (or reasonably used to) determine or ascertain your identity.

“Sensitive information” means (a) information or an opinion about your racial or ethnic origin, political opinions, membership of a political association, religious belief or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, that is also personal information; (b) your health information; (c) your genetic information that is not otherwise health information; (d) your biometric information that is to be used for the purpose of automated biometric verification or biometric identification; (e) or your biometric templates.

We will only collect your personal information where we believe it is necessary for us to provide our services to you that meet your needs and requirements. Your personal information that we collect and hold includes your name, address, contact details, date of birth, occupation and interests. We do not collect your sensitive information unless you have consent to the collection of the

information and the information is reasonably necessary for us to provide our services to you directly or indirectly.

We may collect your personal information with your consent directly or indirectly through:

- our website;
- meeting, interviews, reviews;
- teleconferencing, telephone calls, short message service;
- letters, emails, contracts;
- our representatives;
- social media communication;
- entering competitions, promotions or marketing materials;
- completing and providing us questionnaires, surveys;
- third party, this includes credit reporting agencies, government entities, your solicitors, accountants or broker;
- publicly available sources of information or other organisations where you have provided your consent.

#### **4. Dealing with Unsolicited Personal Information**

Unsolicited personal information is your personal information received by us unrequested. When we received the unsolicited personal information, we will determine whether that information is reasonably necessary for our functions or activities. If it is, we will handle the information in the same way we handle solicited information. If not, we will take steps to destroy the information or to ensure that the information is de-identified.

#### **5. Notification of the Collection of Personal Information**

Where we collect your personal information, we will as soon as reasonably practicable notify you that your information has been collected and the circumstances of that collection.

#### **6. Use or Disclosure of Personal Information**

We collect, hold, use or disclose your personal information for the following purposes:-

- to provide our services;
- to provide you with our communications;
- to analyse, evaluate and improve the performance of our website;
- to update our records and keep your contact details up to date;
- to obtain the services of third party service providers as part of providing our services;
- to comply with the laws and regulations.

Your personal information will not be shared, sold, rented or disclosed other than described in this Privacy Policy

#### **7. Direct Marketing**

Where we have a business relationship with you, or you have consented, we may send updates or other communications to you. You may opt out at any time if you no longer wish to receive our

marketing information. You can make this request by using the contact details provided below, or by 'unsubscribe' from our email marketing messages.

We do not disclose your personal information (including your email address) to any third party for the purpose of allowing them to market their products or services to you.

## **8. Cross-border Disclosure of Personal Information**

We may disclose personal information to our related bodies corporate and third party suppliers and service providers located outside of Australia (in particular, Asia Pacific region) for some of the purposes listed above. We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

We may disclose your personal information to entities within Australia who may store or process your data overseas. In the event that a disclosure is made in an overseas country (which we consider unlikely), the information will not be protected by the Australian Privacy Principles. In any event, by providing your details, you consent to your information being disclosed in this manner.

## **9. Adoption, Use or Disclosure of Government Related Identifiers**

We will not use or disclose your government related identifier unless:

- the use or disclosure of the identifier is reasonably necessary for us to verify your identity for the purposes of our activities or functions; or
- the use or disclosure of the identifier is reasonably necessary for us to fulfil our obligations to an agency or a State or Territory authority; or
- the use or disclosure of the identifier is required or authorised by or under an Australian law or a court/tribunal order; or
- a permitted general situation exists in relation to the use or disclosure of the identifier; or
- we reasonably believe that the use or disclosure of the identifier is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

## **10. Quality of Personal Information**

We will take reasonable steps in the circumstances to ensure that your personal information we keep, use or disclose is accurate, up-to-date and complete.

## **11. Security of Personal Information**

We will take reasonable steps in the circumstances to protect your personal information from misuse, interference and loss; and from unauthorised access, modification or disclosure. And, we will also take reasonable steps to destroy or permanently de-identify your personal information we hold if it is no longer needed for our functions and activities.

## **12. Access to Personal Information**

You may request access to personal information we hold about you, request to access personal information must be made in writing and sent to the contact details provided below. Where it is reasonable and practicable to do so and in accordance with the law, we will provide you with a

suitable means of accessing your personal information. There may be circumstances whereby we cannot grant you access to the personal information, and we will provide you reasons for the refusal.

### **13. Correction of Personal Information**

You may request corrections to any personal information that we hold about if you think the information is inaccurate, out-of-date, incomplete, irrelevant or misleading. Requests must be made in writing which will be actioned accordingly. If we do not agree with the corrections you have requested, we are not obliged to amend the personal information but we may add notes to the personal information stating that you have requested to correct the personal information but we disagree with it.

### **14. Enquiries and Complaints**

If you have any enquiries, concerns or complaints about this privacy policy, please contact us using the contact details provided below.

Contact number: +61 (7) 3252 8988

Email: [info.brisbane@homestates.com.au](mailto:info.brisbane@homestates.com.au)

### **15. Changes to this Privacy Policy**

We may make changes to this Privacy Policy from time to time, without notice to you. An up-to-date copy of our Privacy Policy is available on our website. This Privacy Policy was last updated on 16 February 2017.