

1 Privacy and Security Policy

Harcourts Group (Australia) Pty Ltd ACN 074 304 073 and its related entities (collectively, **Harcourts, us, we, our**) are committed to protecting the privacy of your personal information.

Harcourts is required to comply with the *Privacy Act 1988 (Cth)* including the Australian Privacy Principles (**APPs**).

This policy is intended to provide a general overview of our policies for the handling of your personal information. Other policies may apply instead of or in addition to this Privacy Policy in certain circumstances.

By using our websites (including our websites at www.harcourts.com.au, www.harcourts.net, www.harcourtscomplete.com.au, www.luxurypropertyselection.com, www.harcourtsfoundation.org, www.strandconveyancing.com, www.academyrealestatetraining.com and any other website we may establish or operate from time to time), and/or providing your personal information to us you consent to us handling your personal information in accordance with this Privacy Policy.

2 Collection of your personal information

The kinds of personal information we collect and hold about you, and our use of that information, is dependent on the products and services we provide to you.

In addition to operating a national real estate franchise network, the products and services that we (and/or our franchisees and licensees) provide include providing real estate agency services for the buying, selling, leasing, development and advertising of residential, commercial and rural properties, business broking and providing services in connection with arranging utility connection, removalists, cleaners, conveyancing, financing and insurance.

Generally, this personal information may include (but is not limited to) your name, address, date of birth, telephone number, email address, details of the products or services you have enquired about, property value, rental amounts, insurance details, references (in relation to rental arrangements and job applicants) and photo identification.

Generally, we collect your personal information directly from you unless it is impracticable or unreasonable to do so (for example where you deal with our franchisees, rather than us). From time to time, we may collect personal information about you from third parties (for example, from your representative, from publicly available sources, from your referees where you apply for a position with us, when you transact with our franchisees or if you apply to become a franchisee).

If you provide us with personal information about a third party, you represent, and we collect it on the basis that, you have that person's consent for us to collect and handle their personal information in accordance with this privacy policy.

When collecting your personal information, we will take reasonable steps to provide you with certain information as required under the APPs, including the purpose of collection, who we may disclose your personal information to, any law that requires or authorises us to collect the information and the main consequences if we do not collect all of the personal information we require. If we collect your personal information from another

source, we will take reasonable steps to ensure you are aware of the fact and the circumstances of that collection.

Generally, if we are unable to collect the personal information we require we may not be able to provide you with the products and services you seek. If the information provided is incorrect or incomplete, this may also prevent, limit or otherwise affect our ability to provide products or services to you.

3 Purposes for which personal information is collected, held, used and disclosed

We will use and disclose your personal information for the purposes for which we collected it, and for other related purposes that you would reasonably expect.

Generally, these purposes include responding to your enquiries, providing you (or arranging for our franchisees to provide you) with products and services such as those set out in section 2 above, providing you with marketing information about our products and services and those of our franchisees, obtaining your feedback on your customer experience, conducting promotional activities and for our general business operations (for example, recruitment, maintenance of our business records, compliance with our legal and insurance obligations and statistical purposes).

By providing us with your personal information, you consent to us using your personal information for these purposes. You agree that we may send you such information by post or by electronic means such as email. You can opt-out of marketing and promotional communications at any time by contacting our Privacy Officer via the details shown below.

We may exchange your personal information within the Harcourts corporate group. We may also disclose your personal information to our franchisees, licensees, agents and contractors for the purposes set out above, and for the purposes of those parties providing services to us or performing business services or functions on our behalf.

Apart from the above instances, we may also use and disclose your personal information with your consent and as otherwise required or permitted by law.

4 Sensitive Information

We will only collect 'sensitive information' with your consent. We will assume that you have consented to us collecting all information which is provided to us by you for use in accordance with this policy, including any 'sensitive information', unless you tell us otherwise at the time you provide it to us.

5 Storage and security of your personal information

We may hold your personal information in electronic formats or in hard copy.

We take reasonable steps to securely store your personal information to ensure it is protected from unauthorised access, modification and disclosure, and from other types of misuse, interference and loss. This includes electronic and physical security measures and procedures, staff training and use of password protection software.

We will take reasonable steps to destroy or permanently de-identify your personal information when we no longer require it for any purpose for which it was collected. We may retain your personal information for as long as necessary to comply with any applicable law, for legal, insurance and corporate governance purposes, for the

prevention of fraud and to resolve disputes. Your personal information may also be retained in our IT system back-up records.

The transfer of data over the Internet is inherently insecure. We cannot guarantee the security, during transmission, of any personal information provided to us via our websites. Please bear this in mind when transmitting information by this means to us.

6 Access and correction of your personal information

You may lodge a request to correct personal information that we hold about you if you believe it is inaccurate, incomplete, out-of-date, irrelevant or misleading by contacting our Privacy Officer via the contact details shown below.

You may request that we provide you with access to the personal information we hold about you. Generally, we will provide you with access, except in limited circumstances where the APPs permit us to deny access. Any such requests must be made in writing and directed to our Privacy Officer via the details shown below. Under the APPs we are permitted to charge you a reasonable fee for providing access to your personal information. Please note that no fee will be incurred for requesting access, and if your request for access is accepted we will inform you of the fee (if any) that will be payable for providing access if you proceed with your request.

You may ask us to inform you of the source of any personal information about you that we have collected from a third party. We will provide this at no cost, except in limited circumstances where the APPs or other laws permit us to withhold this information.

7 Making a complaint

You may lodge a complaint with us if you believe we have handled your personal information other than in accordance with the APPs. To do so please contact our Privacy Officer via the contact details below. We will confirm receipt of your complaint and set out the time frame we require to investigate your complaint and provide you with a response. We will endeavor to respond as quickly as possible, which will typically be within 14 days of receiving your complaint.

8 Harcourts website

Our websites use cookies. We do not use the information stored in those cookies to collect information about you or your computer. The cookies are used for statistical purposes and to assist with your use of the website. We may also collect click-stream data when you use the website, such as the date and time of your visit, the pages you accessed, your IP address, the type of browser and operating system you are using and the websites you come from and move to. This information is collected for statistical purposes to assist us to find out how our website is used and navigated and to improve our website.

Harcourts websites may contain links to third party websites. Harcourts is not responsible for the privacy, security or handling of your personal information via those websites. You should review the privacy policy and terms of use for those websites each time you visit them.

9 Overseas disclosure of your personal information

Generally, we will not disclose your personal information to overseas recipients, except upon your request, or if we are authorised or required to do so by law. Generally, such disclosures will be to members of our international corporate group.

If you consent to the disclosure of your personal information to an overseas entity you understand and agree that:

- (a) the overseas recipient is unlikely to be required to comply with the *Privacy Act* and APPs;
- (b) the overseas recipient may not be subject to privacy laws that are similar to the *Privacy Act* or APPs (and may even be compelled to make certain disclosures of your personal information under the privacy regime applicable to them, for example disclosure to the overseas government authorities);
- (c) Harcourts may not take steps to ensure that the overseas recipient handles your personal information in accordance with the *Privacy Act* and APPs;
- (d) the overseas recipient may handle your personal information other than in accordance with the *Privacy Act* or APPs, in which case you will not be able to seek redress for such acts or practices under the *Privacy Act*; and
- (e) Harcourts will not be responsible for, or otherwise liable for the way in which the overseas recipient handles your personal information.

10 Changes to our Privacy Policy

We may amend, modify or replace this Privacy Policy at any time. You should review our Privacy Policy each time you visit our website or provide us with personal information.

11 Contact us

If you would like further information about the way we manage your personal information, or if you have a privacy-related complaint, please contact our Privacy Officer by telephone on +61 7 3839 3100, by mail at 31 Amy Johnson Place, Eagle Farm, QLD 4009, or by email at privacy@harcourts.net.

12 Office of the Australian Information Commissioner

More information about your rights and our obligations in connection with your personal information are available from the Office of the Australian Information Commissioner at www.oaic.gov.au.