

RT EDGAR PTY LTD PRIVACY POLICY

RT EDGAR PTY LTD trading as RT Edgar Pty Ltd is committed to respecting your right to privacy and protecting your personal information.

We adopt and are bound by the Australian Privacy Principles ("APPs") contained in the Privacy Act 1988 (Cth) ("the Act")

We ensure that all officers, employees and subcontractors are aware of and understand RT Edgar Pty Ltd.'s obligations as well as 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 your interactions with RT Edgar, including in person, by telephone, email, correspondence, and through our website.

The purpose of this Policy is to:

- provide you with a clear understanding of the types of personal information we collect and hold
- explain how we collect, use, disclose, store and otherwise handle personal information
- outline the purposes for which we collect, hold, use and disclose personal information
- explain how you can access and request correction of your personal information
- explain how you can make a complaint and how we will handle complaints
- outline the circumstances in which we may disclose personal information to overseas recipients; and
- improve transparency of our operations.

Collection of Personal Information

When dealing with RT Edgar Pty Ltd, whether as a current or prospective seller, buyer, lessor or lessee, we may collect personal information to provide services to you. We do not collect personal information unless it is reasonably necessary for, or directly related to, one or more of the services we provide or functions we carry out.

By providing personal information to RT EDGAR PTY LTD, you acknowledge that we will collect, hold, use and disclose that information in accordance with this Privacy Policy and the Australian Privacy Principles (APP).

The types of personal information we may collect (depending on the nature of our service with you) may include:

- Name and contact details.
- Date of birth.
- Residential, postal and business address.
- Email address.
- Home, work and mobile number.
- Your occupation
- Financial information including details of your employer, income, name of bank or financial institution.
- Details of your spouse, de facto, dependent children, and roommates.
- Details of properties owned by you.

RT Edgar engaged First AML, a regulatory technology provider, to assist us with our customer due diligence and anti-money laundering obligations. Certain personal information you provide may be collected, verified and securely stored by First AML on our behalf, including checks against identity documents, sanctions, PEP and adverse media databases. First AML acts solely on our instructions as a data processor, and information is retained in line with our record-keeping obligations under applicable AML/CFT legislation. For full details of their data handling practices, see the [First AML Privacy Policy](#).

Customer Due Diligence (AML/CTF obligations)

In some circumstances, we are required by law to collect and verify your identity and other personal information.

Why we collect your information

We collect your personal information to comply with our obligations under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)* (AML/CTF Act) and associated Rules. This includes to:

- establish and verify your identity before providing certain services
- confirm whether you are acting on behalf of another person or entity
- assess and manage risks of money laundering, terrorism financing or related criminal activity
- comply with our legal reporting obligations to AUSTRAC
- meet our record-keeping obligations

What personal information we collect

For AML/CTF purposes, we may collect:

- your full name, date of birth and residential address
- identification information (e.g. driver licence, passport details or other government-issued ID)
- contact details
- information about the person or entity you represent (if applicable)

For the avoidance of doubt, Personal Information we collect from you will include information you provide when:

- you interact with our website including the submission of your details via the 'Contact' page and website forms.
- you visit RTE social media platforms and participating in any activity on a Social Media including but not limited to entering competitions, subscribing to our blog, posting, pinning or uploading any material on any Social Media Site, following, liking and/or commenting on us or anything on any Social Media Site or website.
- you provide us with information at our open for inspections, during conversation that you have with our representatives, through your engagement of us to enquire about our services, through your engagement of us to provide services;
- you communicate with us by telephone, email, letter or fax or when you share information with us from other social applications (including

Social Media Sites) and services;

- complete a transaction with us; By Australia's [Anti-Money Laundering and Counter-Terrorism Financing \(AML/CTF\) Act](#), we must verify your identity and understand where funds are coming from before the transaction can proceed.
- you complete surveys, provide feedback, engage in our promotions or enter competitions;
- we require details of your company's ABN and/or ACN, financial information including bank account and credit card details, profit and loss statements, balance sheets, your employer and occupation details and title and mortgage details of any relevant property; or
- we are required to take images or videos of your home or other property.

We will not ordinarily ask you to provide sensitive information. However, there may be circumstances where the information provided by you reveals sensitive information. For example:

- You may require a property with features, such as wheelchair ramps. This may reveal health information.
- In providing details of your spouse or de facto partner, this may reveal sensitive information regarding your sexual orientation.

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/social platforms, complete surveys, feedback, promotional materials or competitions,

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 credit reporting agency, your legal adviser, your past or current employers, your previous lessors or property managers, and tenancy information services or databases.

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.

For example, whenever documents are to be submitted to government agencies or financial institutions, it is essential that we record your name accurately.

Minors

We do not knowingly solicit or collect Personal Information from minors (individuals under 18 years of age). If we discover that we have received Personal Information from an individual who indicates that they are, or whom we otherwise have reason to believe is, a minor, we will promptly delete such information from our systems.

A minor's parent or legal guardian may request that the minor's Personal Information be corrected or deleted from our records by contacting us (see the "Contacting Us" section for more information).

Please note that submitting a deletion request, or our deletion of such information, may not guarantee the complete or comprehensive removal of all content or information.

Use and Disclosure of Personal Information

Personal information collected by RT Edgar Pty Ltd will ordinarily be used for the following purposes:

- Assisting you to sell your property.
- Assisting you to purchase a property.
- Assisting you to lease a property (either as lessor or lessee).
- Assisting you to obtain a loan.
- Assisting you with payment or refund of a bond.
- Assisting you with tenancy disputes.
- Coordinating repairs or maintenance to a property owned or leased by you.
- Recording or accessing information at the Titles Registry Office or other governmental agency.
- Recording or accessing information at the Residential Tenancies Authority.

- Recording or accessing information on tenancy information services or databases.
- Client and business relationship management.
- Marketing of products and services to you.

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

- If you are a seller or a lessee, we may disclose your personal information to prospective buyers of the property owned or leased by you.
- If you are a buyer or a lessee, we may disclose your personal information to the sellers of the property you are purchasing or leasing.
- Your legal advisor(s) and the legal advisor(s) representing the other party(s) involved in your transaction.
- Your financial institution and/or financial advisor.
- Insurance providers and brokers.
- Utility providers and utility connection service providers.
- Persons or organisations involved in providing, managing or administering your product or service, including independent contractors engaged by us as real estate agents.
- Tradespeople engaged by us to repair or maintain a property owned or leased by you.
- 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 purchasing part or all of our business.
- Organisations involved in the payments systems including financial institutions, merchants and payment organisations.
- The Titles Registry Office or other government agency.
- The Residential Tenancies Authority.
- Tenancy information services or databases.
- Real estate peak bodies.
- Real estate websites.
- Police.
- As required by law

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 (e.g. police, ASIC, Immigration Department).

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

While providing services to you, it may be necessary for us to enter your personal information into forms generation software and real estate websites. Depending on the terms of use of such software and websites, a third party may acquire rights to use or disclose information entered the relevant forms or websites.

The collection and use of personal information by third parties may be subject to separate privacy policies or the laws of other jurisdictions.

R T EDGAR PTY LTD technology service providers and others may store or process personal information in Australia and other jurisdictions in which their infrastructure is located. In these circumstances, we will take reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles (APPs) in relation to the information. A copy of the APPs may be obtained from the website of The Office of the Australian Information Commissioner at www.oaic.gov.au. We will also require all suppliers and contractors to provide privacy undertakings and enter into confidentiality agreements.

There may be limited circumstances in which it is necessary for us to collect a government related identifier. We will not use or disclose your government related identifiers unless we are required or authorized to do so by law or by a court or tribunal order, or to fulfill our obligations to a State or Territory authority.

Marketing our products and services

R T EDGAR PTY LTD may use or disclose your personal information to let you know about products and services in which you may be interested. You may opt out of marketing communications at any time using the unsubscribe facility in electronic communications or by contacting us. (see the Contacting Us section for more information).

Accuracy of Personal Information

R T EDGAR PTY LTD 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.

R T EDGAR PTY LTD 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.
- 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.

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

RT EDGAR PTY LTD is committed to take reasonable steps to protect your Personal Information from misuse, loss, unauthorised access, modification, or disclosure. These measures include physical security safeguards, restricting access to authorised personnel, and using industry-standard security technologies such as passwords, data backups, antivirus software, and firewalls..

While we take reasonable steps to help protect your Personal Information, information transmitted over the internet is not always completely secure. Unless otherwise indicated, our website does not provide a secure means of transmitting Personal Information.

Cookies and Tracking Technologies

We may use cookies or other similar tracking technologies on our website to recognise a user's browser each time you visit our website, to track which pages you visit whilst on our website, and to deliver relevant advertisements. Cookies are pieces of information that a website transfers to a computer's hard drive for record keeping purposes. Most web browsers are set to accept tracking technologies such as cookies. These tracking technologies may not personally identify the user.

If you do not wish to receive any cookies, you may set your browser to refuse them (or disable them). However, your use of our website may be affected as it may not work as intended.

Social Media Integration

If you view the online webpage relating to any of our properties for lease or sale, you may enquire further about the property by manually completing an online enquiry form or by authenticating your details through your Facebook or LinkedIn account. If you choose to authenticate your details via your social media account, we may be provided with personal information linked to your account.

If you 'like' or 'follow' us or a property via our Facebook, Instagram, LinkedIn or other social media pages, we may be able to view your social media profile, subject to your privacy settings on those platforms.

Paid Social Media and Digital Advertising

We may use paid advertising services provided by social media platforms (including Facebook, Instagram, LinkedIn and Google) and other digital advertising networks to promote our services and properties. These platforms may use cookies and similar technologies to:

- Show you relevant advertisements based on your interests and online activity.
- Measure the effectiveness of our advertising campaigns.
- Create audiences of users with similar characteristics to our clients.

When you interact with our advertisements on social media or other digital platforms, those platforms may collect information about your activity in accordance with their own privacy policies. We may receive aggregated, non-personally identifiable information about the performance of our advertisements.

You can manage your advertising preferences through the settings on each social media platform or by using your browser's privacy settings.

Website Security and Data Transmission

The website is hosted in Australia. If you do not reside in Australia, then by using the website, you consent to the transfer of any personal information to Australia.

We may provide you with a unique password to verify your identity before allowing access to some features of the website. You are responsible for maintaining the secrecy of this password and therefore any information which can be viewed by entering this password on the website. You are responsible for notifying us of any loss or unauthorised use of your password.

We cannot guarantee secure transmission of personal information submitted via the internet through our website. We cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

External Websites

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 RT EDGAR PTY LTD holds about you (see the **Contacting Us** section for more information).

Each timeframe applies to your request and if any delays are anticipated. You will need to verify your identity before access to your personal information is granted.

We will respond to requests for access to or correction of personal information within a reasonable period and in accordance with our obligations under the [Privacy Act 1988 \(Cth\)](#) and the [Australian Privacy Principles](#).

While we cannot and do not charge an "application fee" for you applying to access your personal information, we may charge a fee for giving you access to your personal information in your preferred format (where reasonable and possible), which will cover our costs involved in locating and collating information as well as reproduction costs.

Once your request has been processed by RT EDGAR PTY LTD, 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 endeavour to make the information available to you in the manner requested by you unless it is unreasonable for us to do so (e.g. 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.

Under the Act, we may refuse to grant access to personal information if:

- We believe that granting access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety.
- Granting access would have an unreasonable impact upon the privacy of other individuals.
- Denial of access is required or authorised by law or by a Court or Tribunal order.
- Giving access would be unlawful.
- The request for access is frivolous or vexatious.
- Legal proceedings are underway or anticipated and the information would not be accessible by way of the discovery process in those proceedings.
- Giving access would reveal our intentions in relation to negotiations between us and you in such a way as to prejudice those negotiations.
- Giving access is likely to prejudice enforcement related activities conducted by, or on behalf of, an enforcement body.
- Giving access is likely to prejudice action being taken or to be taken with respect to suspected unlawful activity or serious misconduct relating to our functions or activities.
- Giving access would reveal information in connection with a commercially sensitive decision-making process.

If we do not agree to make a correction to your personal information, you may provide a statement about the requested corrections, and we will ensure that the statement is apparent to any users of the relevant personal information.

If we do not agree to provide access to your personal information or to correct your personal information, we will provide written reasons for the refusal and the

mechanisms available to complain about the refusal (see the **Complaints** section for more information)

Contacting Us

You may contact us by mail, email or telephone:

Address: 10 Wallace Avenue, Toorak, Victoria 3142
Email: rtedgar@rtedgar.com
Phone: 03 9826 1000

Complaints

If you consider that there has been a breach of the Australian Privacy Principles, you are entitled to complain to RT EDGAR PTY LTD (see the **Contacting Us** section above 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 20 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.

If you consider that we have not adequately dealt with a complaint, you may complain to the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner (OAIC)

Address: GPO Box 5218, Sydney NSW 2001
Email: enquiries@oaic.gov.au
Phone: 1300 363 992

Policy Review

This policy is to be reviewed as follows:

- Annually as a minimum.
- Following an information security incident.
- Following significant changes to our systems.
- Following changes to the relevant State and Commonwealth legislation.
- We may update this Privacy Policy from time to time. The most current version will be available on our website www.rtedgar.com. We encourage you to periodically review this Privacy Policy Statement so that you remain informed as to how we are protecting your Personal Information.

Copyright

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Disclaimer

RT Edgar Pty Ltd, its directors, partners, employees and related entities responsible for maintaining this website believe that the information contained on this website is correct. However, no representation or warranties of any nature whatsoever are given, intended or implied, and you should rely on your own inquiries as to the accuracy of any information or material available from this website. RT Edgar will not accept any liability for any loss or damage which may be incurred by any person acting in reliance upon the information.

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This Website contains links to other internet sites that are external to RT Edgar Pty Ltd operated by third parties. RT Edgar Pty Ltd takes reasonable care in linking other internet sites but has no direct control over the content of the linked internet sites.

RT Edgar may update this Privacy Policy from time to time. The most current version will always be available at www.rtedgar.com