

# PRIVACY POLICY

Castran Gilbert (Aust) Pty Ltd (the entity) is a provider of real estate services. These services include, but are not limited to:

- Acting as a real estate agent in the purchase and sale of real estate
- Providing appraisals of real estate
- Leasing & management of real estate
- Advertising & marketing of real estate

Castran Gilbert acknowledges the importance of protecting the privacy of its members and the privacy of other users who may seek our services. The following privacy statement applies to all information provided by individuals or organizations seeking services or providing information to Castran Gilbert.

## **Why we collect personal information and what we use it for, including disclosure to third parties**

We will only collect personal information, if the information is reasonably necessary, for us to facilitate activities that will enable us to provide our services as a real estate agency. This can include, but are not limited to:

- Processing and addressing inquiries and feedback
- Facilitating the sales of a property, and all of the necessary, reasonably expected, activities associated with the sale of a property, which can include the sharing of the information with other third parties
- Facilitating the leasing of a property, and all of the necessary, reasonably expected, activities associated with the leasing of a property, which can include the sharing of the information with other third parties
- Providing updates and information on our properties and projects
- Advising clients of other services, products and information which may be of interest, and the activities associated such as remarketing and servicing promotional materials
- Data analysis to help us in improving the services that we provide
- To facilitate any activities, including disclosure of information to third parties, as requested by the Law.

We will only disclose information to other third parties if it is reasonable necessary for us to complete the above activities. Other third parties can include, but are not limited to:

- Buyers & Prospective Purchasers
- Vendors
- Landlords
- Tenants & Prospective Tenants
- Solicitors

- Contractors
- Developers
- Builders
- Government Departments
- Financial Institutions
- Service Providers such as, but not limited to, real estate database providers
- Technical Support providers
- Utility companies (if we are requested to set up utilities on your behalf)
- Telecommunication Providers (if we are requested to set up broadband & pay TV on your behalf)

### **Types of personal information collected**

Castran Gilbert will only collect personal information from individuals where it is required for the purposes of providing specific services to individuals or organizations. Information is collected by lawful and fair means, and with consent.

The information we collect will differ based on the services we are providing to you. It may include:

- Name
- Email address
- Phone numbers
- Home and/or mailing addresses
- Family details
- Employment details
- Financial information, which can include assets, liabilities, income, outgoings, spending patterns and credit reference reports
- The value of your property
- Insurance details
- Credit card and banking details
- Credit Related Information
- Information in respect to a will or estate;
- References (e.g. to support rental arrangements);
- Copies of photo identification (e.g. driver's licence, passport, student ID); or
- Any other personal information relevant to the service we are providing to you.

We will always notify you of the information that will be collected and will always seek consent to do so.

We will not use or disclose information for another purpose unless the individual has provided their consent or if we are compelled by law or court/tribunal order.

## **Sensitive Information**

We will not collect sensitive information about an individual unless the individual has provided consent to the collection of the information and the information is reasonably necessary for us to provide our services. Sensitive information, as defined by the Privacy Act 1988, pertains to information or an opinion about an individual's:

- racial or ethnic origin; or
- political opinions; or
- membership of a political association; or
- religious beliefs or affiliations; or
- philosophical beliefs; or
- membership of a professional or trade association; or
- membership of a trade union; or
- sexual orientation or practices; or
- criminal record;
- health information about an individual; or
- genetic information about an individual that is not otherwise health information; or
- biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or
- biometric templates.

## **How we collect and hold personal information**

Through engaging and interacting with any of the services that Castran Gilbert provides, your personal information may be collected, with consent, via forms & applications, either electronically or paper based, through conversations or inquiries, via any of the below channels:

- Castran Gilbert website: <https://castrangilbert.com.au/>
- Castran Gilbert associated project websites
- Paper or digital forms completed at any Open Inspections, Launches, Display Suites or any events by Castran Gilbert
- Any of Castran Gilbert's Social Media Channels including Facebook, Twitter, Instagram, LinkedIn and YouTube
- Emails, SMS, Instant Message (such as WeChat) or over the phone
- Conversations, verbal or written, with any of our staff or partners
- Referrals

We may also collect personal information from third parties, including information on public domains or through service providers.

We hold personal information, both electronically and in paper form, both at our premise as well as with the relevant service providers that we engage with to maintain our operations and provide our services.

We will take reasonable steps in the circumstances to protect the integrity of information from misuse, interference, loss, unauthorised access, modification and inadvertent disclosure. These steps include, but are not limited to:

- Firewall and anti-virus protection software
- Restricted access and control via separate user accounts and passwords, managed by a central administration team
- Regular backups of data
- Documentation, training and guidelines for all our staff on proper management of information

### **Site Analysis**

Castran Gilbert utilises a third party software to assess site traffic. A tracking code is used to collect the following information:

- The number of page views (or page impressions) that occur over a given period;
- The number of unique visitors to the respective Castran Gilbert website;
- How long these unique visitors (on average) spend on the site or on a specific page;
- Common entry and exit points into the respective Castran Gilbert website.
- The devices, browsers and operating systems the user is using

The above information is collected for, but not limited to, the following purposes:

- Monitor website traffic
- Assess website performance
- In analysis to identify improvements for the website
- Identify popularity and interests in certain information on the website, such as a particular listing or page
- Internal performance metrics

Castran Gilbert uses cookies as data files that our website may write to your hard drive when you visit. The only personal information a cookie can contain is information you supply. A cookie cannot read data from your hard disk.

Users may elect to accept or reject the cookie and can also refuse cookies by switching off the function in their web-browser.

### **Data quality**

Castran Gilbert will take all reasonable steps to ensure that all personal information it collects or uses will be accurate, complete and up to date.

## **Data Security**

Castran Gilbert will take all reasonable steps to ensure that all personal information it collects and stored are secured. However, information security over the internet cannot be 100% guaranteed.

Thus please also ensure you take the necessary precautions when providing us with personal information. Such precautions can include:

- Making sure to not use a public computer or device to provide personal information
- Clearing your browser sessions and cookies
- Close your browser after your session
- Not disclosing your account details (such as username and password) to other people
- Investing in internet security applications such as firewalls and antivirus software

## **Data termination**

If we no longer require personal information about an individual and no longer needs information for the purpose it was intended and information is not contained in Commonwealth records and is not required by law or court/tribunal order to retain the information, Castran Gilbert will take reasonable steps in the circumstances to destroy the information e.g. by using software deletion programs and physical destruction mechanisms.

## **Process for access, correction and feedback or complaint**

You can contact our Digital Team (details below) for any of the following queries:

- Access to any of your personal information
- Make corrections to any of your personal information
- Withdraw consent regarding your personal information
- Provide feedback on our privacy policy
- Ask a question regarding our privacy policy and the information we collect
- File a complaint regarding our privacy policy

You will then receive a response from our team within 10 business days, who will advise you of how your request will be addressed and when you can expect an update. Your request will usually be completed within 30 days after the date the request is made, however this period can be longer if it is reasonably expected to take longer due to the nature of your query.

## **Filing a complaint**

In the instance of a complaint, we recommend the individual follow the subsequent process:

1. Individual should first contact Castran Gilbert directly; if still unresolved then
2. Alternative dispute resolution should be conducted between the parties; if still unresolved then
3. Individual can make a complaint to the Office of the Australian Information Commissioner

## Request refusal

In certain situations, we may refuse your request for access or correction to the personal information collected. Examples of situations include, but not limited to:

- The individual does not have the authority to access the information (i.e. the information requested does not pertain to the individual requesting)
- Giving access would have an unreasonable impact on other individuals
- Access would be unlawful
- Access would reveal information generated with commercial sensitive decision-making process

In this situation, we will provide you with a written notice detailing the reason/s for refusal, as well as guideline on how you may refute or make a complaint about the refusal.

## Disclosure of information offshore

Personal information is managed by us and stored locally, on premise, in Australia as well as managed by our main service providers, and also stored in Australia and offshore in Kobe/Tokyo, Japan and Phoenix, Arizona, United States.

Disclosure of information offshore to countries other than the above is unlikely, however, in some situations we may use programs, software, online tools, or Social Media Sites that may be based in and/or housed overseas. An example, but not limited to, is Google Drive and its respective suite of products such as Google Sheets and Gmail, which processes data in various countries around the world.

Our use of such products may involve disclosure of personal information to such organisations overseas. Use and disclosure of Personal Information by such overseas organisations is in accordance with the terms and conditions and privacy policies of such organisations. Countries where these organisations may disclose information to include North America, countries in Asia and Europe.

By providing us with personal information, you consent to us using and disclosing your personal information in this manner. If at any time you wish to withdraw your consent, please contact our Digital Team (details below). However, we may not be able to provide the Services you have requested in whole or in part or those Services may have to be modified.

## Contact Details

If you have any questions regarding our privacy policy, you can contact:

**customer@castrangilbert.com.au** Alternatively, you can call our office on **03 9827 1177**.

**CASTRAN  
GILBERT**