

Privacy Policy

This privacy policy applies to the collection, storage, use and disclosure of personal information by or on behalf of the Independent Property Group (referred to in this policy as “**IPG**”, “**our**”, “**we**” or “**us**”).

Please read it carefully.

We are committed to protecting your personal information, and ensuring its privacy, accuracy and security. We handle your personal information in a responsible manner in accordance with the *Privacy Act 1988 (the Act)* and the Australian Privacy Principles (**APPs**).

You do not have to provide us with your personal information. However, if you do not, we may not be able to conduct business with you.

By using any of our products or services, visiting our website or giving us your personal information, you agree to your information being collected, stored, used and disclosed as set out in this Privacy Policy.

Defined Terms

In this policy:

Independent Property Group (IPG) means Independent Property Group Holdings Pty Limited ABN 59 143 715 959, Independent Property Group Sales Pty Limited ABN 60 143 878 353, Independent Property Management (ACT) Pty Limited ABN 75 143 878 415, Independent Property Group IP Pty Limited ABN 76 671 620 965, Blue Sky Property (ACT) Pty Ltd ABN 26 668 806 844 trading as Independent South, Blue Sky PM (ACT) Pty Limited ABN 40 670 404 556, Artisan Residential Pty Limited ABN 52 668 105 468 trading as Independent North, Artisan Property Management ABN 62 668 107 506, Artisan Short Stay Pty Limited ABN 18 672 375 209, and any Related Bodies Corporate.

personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not, and whether recorded in a material form or not.

Related Bodies Corporate has the same meaning given to it in the *Corporations Act 2001* (Cth).

sensitive information (a type of personal information) has the same meaning as in the Act. In summary, it means information or an opinion about an individual’s race or ethnic origins, political opinions and associations, religious beliefs or affiliations, philosophical beliefs, sexual preferences or practices, trade or professional associations and memberships, union membership, criminal record, health or genetic information or biometric information.

1. Collection of personal information

a. What kinds of personal information?

The personal information we collect and hold includes:

- i. names, addresses, e-mail addresses, phone numbers and other contact details, occupation, household details (including the names of those in your household), employment references, rental references, and other information to assist us in conducting our business, providing and marketing our products and services (including to assess any rental applications);
- ii. photographic identification;
- iii. payment details, credit information and financial information, including identification information, repayment history information, the type and amount of credit, default information, court proceedings information, personal insolvency information, publicly available information about credit worthiness, opinions about serious credit infringements, and other personal information about an individual's credit worthiness, such as credit ratings or scores;
- iv. information about staff and directors, as required in the normal course of human resource management and the operation of a business (including but not limited to name, address, date and place of birth, contact information, tax file number (if provided), emergency contact information, bank account details and right to work information); and
- v. information about current and previous IPG suppliers and clients with whom IPG has dealings.

We will only collect your sensitive information:

- i. if you have consented to us doing so – for example, as part of information collected about directors and employees of IPG for IPG's corporate compliance, visa applications and human resource management purposes; or
- ii. where required or permitted by law.

b. Why we collect personal information

We collect the personal information:

- i. necessary for us to provide you with the products and services you have requested from us including acting as agent, buying or selling properties, leasing properties, and managing unit plans;
- ii. for marketing purposes and to provide you with information about products and services that may be of interest to you (subject to your rights to opt out) so that we can better understand your needs and tailor our future products and services accordingly;
- iii. to improve the products and services we provide, and to respond to your enquiries and feedback;
- iv. (for our employees and contractors) for employment related purposes, such as recruitment and training; and
- v. to enable us to conduct our business, including meeting our legal and regulatory obligations.

If you do not provide your personal information, we may not be able to supply the requested product or service, employ you or otherwise deal with you.

c. How do we collect personal information?

We only collect personal information by lawful, fair and reasonable means. We usually collect personally information from you directly. However, we may also collect your personal information from a range of sources, including from your representatives, recruitment agencies, contractors,

Effective Date: 20th January 2025

business partners, or government agencies. For example, we may collect your personal information when you:

- i. request or acquire a product or service from us (whether as part of attending an Open Home, a face-to-face meeting, interview or telephone call);
- ii. provide a service or product to us;
- iii. apply for employment with us (including obtaining information from recruitment agencies or your previous employers);
- iv. are a tenant within a property that we are appointed to manage;
- v. subscribe to our marketing materials such as Quarterly Reports, Newsletters, and Listing Updates;
- vi. view our website or take specific actions on our website (we use Google Analytics remarketing codes which allows us to provide targeted advertising); or
- vii. communicate with us via our website, our social media channels, by e-mail, telephone or in writing (including supplying business cards).

If you provide personal information about someone other than yourself, you agree that you have that person's consent to provide the information for the purpose for which you provide it to us. You also agree that you have told the person about this Privacy Policy and where to find it.

d. How we deal with unsolicited personal information

If we receive personal information about you that we have not requested, and we determine that we could not have lawfully collected that information under the APPs had we asked for it, we will destroy or de-identify the information if it is lawful and reasonable to do so.

e. Do you have to disclose your identity when dealing with us?

Where lawful and practicable, we will give you the option of interacting with us anonymously or using a pseudonym.

2. Use and disclosure of personal information

a. Use of personal information

We only use your personal information for the purpose for which it was provided to us, for related purposes or as required or permitted by law. Such purposes include:

- i. in the ordinary course of conducting our business. For example, supplying services such as assisting with purchasing, selling or leasing properties, managing unit plans, acquiring products and services, 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;
- ii. market research and product and service development, so that we are able to better understand our customers' needs and tailor our future products and services accordingly;
- iii. performing general administration, reporting and management functions. For example, invoicing and account management, payment processing, risk management, training, quality assurance and managing suppliers;
- iv. employment-related purposes, such as recruiting and providing services to staff;
- v. as part of a sale (or proposed sale) of all or part of our business; and

Effective Date: 20th January 2025

- vi. 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.

b. Disclosure of personal information

We may disclose, and you consent to us disclosing, your personal information to third parties:

- i. engaged by us to provide products or services, or to undertake functions or activities, on our behalf. For example, processing payment information, managing databases, providing computer software programs, undertaking property maintenance, marketing, research and advertising;
- ii. that are authorised by you to receive information we hold;
- iii. that are our business partners, joint venturers, partners or agents;
- iv. 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 advisors;
- v. such as our external advisers, and government agencies. For example, where disclosure is reasonably required to obtain advice, prepare legal proceedings or investigate suspected unlawful activity or serious misconduct; or
- vi. as required or permitted by law.

We may disclose, and you consent to us disclosing, your personal information among the entities that comprise IPG and to any of our Related Bodies Corporate 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, the APPs and the Act.

c. Use or disclosure of sensitive information

We will only use or disclose your sensitive information for the purpose for which it was initially collected or for a directly related purpose, as required or permitted by law, or where you consent to the use or disclosure.

d. Marketing use and disclosure

We may use and disclose your personal information (other than sensitive information) to provide you with information about our products and services that we consider may be of interest to you.

You may opt out at any time if you do not, or no longer, wish to receive marketing and promotional material. You may do this by:

- i. contacting us via e-mail or in writing at the address below (addressed to the Privacy Officer) and requesting that we no longer send you marketing or promotional material;
- ii. where applicable, clicking the “Unsubscribe” button; or
- iii. if you are using our website and wish to opt out of Google Analytics, by using the DoubleClick opt out page: (https://www.google.com/settings/ads/onweb#display_optout) or the Network Advertising Initiative opt-out page (<https://optout.networkadvertising.org/?c=1>).

3. Disclosure of personal information overseas

We may disclose personal information to overseas recipients including but not limited to contracted service providers or Related Bodies Corporate based outside Australia for processing, storage or back-up. Overseas recipients are generally located in the United States of America and the Philippines.

Effective Date: 20th January 2025

Any overseas disclosure does not affect our commitment to safeguarding your personal information. Where reasonable in the circumstances, our contracts with overseas recipients oblige them to comply with the APPs and the Act. However, you acknowledge that, in agreeing to the disclosure of your information to overseas recipients, we will no longer be required to take reasonable steps to ensure overseas recipients' compliance with the APPs in relation to your information and we will not be liable to you for any breach of the APPs by those overseas recipients. On this basis, you consent to such disclosure.

4. Data quality

We take reasonable steps to ensure that your personal information is accurate, complete and up-to-date. However, we rely on you to advise us of any changes or corrections to the information we hold about you.

If you consider that the information we hold about you is not accurate, complete or up-to-date, or if your information has changed, please contact the Privacy Officer (address below) as soon as possible.

5. Security of personal information

a. Security

We may store your information in hard copy or electronic format and keep it in storage facilities that we own and operate ourselves, or that are owned and operated by our service providers. We implement a number of technical and organisational methods to protect your personal information from misuse, interference, loss and unauthorised access, modification and disclosure. Such technical and organisational measures include:

- i. physical security over paper-based and electronic data storage and premises;
- ii. computer and network security measures, including use of firewalls, password access and secure servers and multi-factor authentication;
- iii. restricting access to your personal information to employees and those acting on our behalf who are authorised and on a 'need to know' basis;
- iv. implementing policies on the use of personal information and training employees on data protection;
- v. retaining your personal information for no longer than it is reasonably required, unless we are required by law to retain it for longer; and
- vi. entering into confidentiality agreements with staff and third parties.

b. Destruction and de-identification of personal information

Where we no longer require your personal information, including where we are no longer required by law to keep records relating to you, we will ensure that it is de-identified or destroyed.

6. Access and correction

a. Access to personal information

You may request access to the personal information we hold about you by contacting us. We will respond to your request within a reasonable time.

We will provide you with access to the information we hold about you unless otherwise permitted or required by law. If we deny you access to the information, we will notify you of the basis for the denial unless an exception applies.

Where reasonable and practicable, we will provide access to the information we hold about you in the manner you request.

No fee applies for requesting access to information we hold about you. However, we reserve the right to charge a reasonable fee where we do provide access.

Any request to access personal information must be directed to our Privacy Officer (details below).

b. Correction of personal information

If you believe that personal information we hold about you is incorrect, incomplete or not current, you may request that we update or correct your information by contacting our Privacy Officer. We will deal with your request within a reasonable time.

If we do not agree with the corrections you have requested (for example, because we consider that the information is already accurate, up to date, complete, relevant and not misleading), we are not required to make the corrections. However, where we refuse to do so, we will give you a written notice setting out the reasons.

7. Identifiers

We do not adopt, use or disclose government related identifiers except as required or permitted by law.

18. Complaints

If you have a complaint in relation to the collection, storage, use or disclosure of your personal information, please contact our Privacy Officer using the details below. You will need to provide us with details of your complaint, as well as any supporting evidence and information.

We will review all complaints received and our Privacy Officer will respond to you as soon as practicable.

If you are not satisfied with our response, you may discuss your concerns with or complain to the Australian Privacy Commissioner via www.oaic.gov.au.

9. Automated decision-making systems

We do not use computer programs or systems that use personal information to make automated decisions.

10. Changes to this Privacy Policy

We reserve the right to revise this Privacy Policy or any part of it from time to time. Please review this Policy periodically for changes. Any revised policy will be placed on our website at <https://independent.com.au/privacy-policy>

Your continued use of our website, products or services, requesting our assistance, or the provision of further personal information to us after this Privacy Policy has been revised, constitutes your acceptance of the revised Privacy Policy.

11. How to contact us

If you have any questions about this Privacy Policy, please contact IPG's Privacy Officer:

- i. by way of feedback tab on website
- ii. by telephone: 02 6909 1587
- iii. by email: clientcare@independent.com.au

iv. by post: 18 Townshend Street, Phillip ACT 2606

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