# **Privacy Policy**

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#### Who are we?

'We', 'us' and 'our' refer to Assured Property Group ACN 619 732 277 and our subsidiaries and related businesses.

# Our commitment to protect your privacy

We understand how important it is to protect your personal information. This document sets out our privacy policy commitment in respect of personal information we hold about you and what we do with that information.

We recognise that any personal information we collect about you will only be used for the purposes we have collected it or as allowed by law. It is important to us that you are confident that any personal information we hold about you will be treated in a way that ensures protection of your personal information.

Our commitment in respect of personal information is to abide by the Australian Privacy Principles for the protection of personal information, as set out in the Privacy Act and any other relevant laws.

#### Definitions

Assured group of companies means Assured Home Loans Pty Ltd (ACN 066 462 977), Assured Property Group Pty Ltd (ACN 619 732 277), Assured Wealth (ACN 616 341 336), Assured Financial Wellness Pty Ltd (ACN 614 454 705) as an assumed joint venture.

Service Providers means businesses we associate with and recommend them on a preferred basis and provide personal information to enable them to provide their service.

Personal information means information from which your identity is reasonably apparent. This information may include information or an opinion about you.

The Assured group of companies strives to provide an all-inclusive service, so we may provide your personal/sensitive information to Assured Home Loans, Assured Wealth or Assured Financial Wellness so that it can review your current financial position and provide you with credit assistance.

The kinds of personal information we may collect about you include your name, date of birth, address, occupation, and any other information we made need to identify you.

In the process of providing our services we may collect more detailed personal information including your property investment experience and interests.

If you apply for employment with us we will collect information about your work history and ask your referees about you. If you apply to become a Property Consultant in order to assist through we will collect information to enable us to assess whether you meet accepted standards.

#### Why we collect your personal information

We collect personal information for the purposes of reviewing your current situation and sourcing investment property options. We may also collect your personal information for the purposes of

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direct marketing and managing our relationship with you. From time to time we may offer you other products and services.

If you apply to become a Property Consultant with us or apply for employment with us we will collect information about you to assist us to decide whether to appoint you.

We collect payment information in order to process your payments.

To enable us to maintain a successful business relationship with you, we may disclose your personal information to other organisations that provide products or services used or marketed by us. The types of organisations to which we are likely to disclose information about you include other companies in the Assured group, service providers, mortgage intermediaries, lenders, valuers, surveyors, conveyancers, real estate agents, recoveries firms, debt collectors and lawyers. We may also disclose your personal information to any other organisation that may have or is considering having an interest in your property purchase, or in our business.

#### How do we collect your personal information?

Where reasonable and practical we will collect your personal information directly from you. We may also collect your personal information from finance brokers and other people such as banks, financial planners, lawyers and referees.

#### Do we disclose your personal information?

We may disclose your personal information:

- to other organisations that are involved in purchasing a property such as third party suppliers, printing and postal services, call centres, trade insurers, real estate agents and financial planners;
- to associated businesses that may want to market products to you;
- to companies that provide information and infrastructure systems to us;
- to anybody who represents you, such as finance brokers, lawyers and coneyancers;
- to anyone, where you have provided us consent;
- where we are required to do so by law, such as under the *Anti-Money or Laundering and Courter Terrorism Financing Act* 2006 (Cth) or in accordance with a subpoena or summons issued by a court;
- to investors, agents or advisers, or any entity that has an interest in our business; or
- to your employer, referees or identity verification services.

Prior to disclosing any of your personal information to another person or organisation, we will take all reasonable steps to satisfy ourselves that:

- (a) the person or organisation has a commitment to protecting your personal information at least equal to our commitment, or
- (b) you have consented to us making the disclosure.

We use cloud storage to store personal information that we hold. The cloud storage and the IT servers may be located outside Australia.

We do not generally disclose your personal information to overseas, however entities that provide support functions to us may do so. You may obtain more information about these entities by contacting us.



#### Direct marketing

From time to time we may use your personal information to provide you with current information about property you may find of interest, changes to our organisation, or new products or services being offered by us or any company with whom we are associated.

If you do not wish to receive marketing information, you may at any time decline to receive such information by emailing us at **enquiries@assuredpropertygroup.com.au**. If the direct marketing is by email you may also use the unsubscribe function. We will not charge you for giving effect to your request and will take all reasonable steps to meet your request within a reasonable timeframe.

#### Updating your personal information

It is important to us that the personal information we hold about you is accurate and up to date. During the course of our relationship with you we may ask you to inform us if any of your personal information has changed.

If you wish to make any changes to your personal information, you may contact us. We will generally rely on you to ensure the information we hold about you is accurate and complete.

### Access and correction to your personal information

We will provide you with access to the personal we hold about you. You may request access to any of the personal information we hold about you at any time.

We may charge a fee for our costs of retrieving and supplying the information to you.

We aim to respond within 30 days of receiving your request. We may need to contact other entities to properly investigate your request.

There may be situations where we are not required to provide you with access to your personal information, for example, if the information relates to existing or anticipated legal proceedings, or if your request is vexatious.

An explanation will be provided to you if we deny you access to the personal information we hold about you.

If any of the personal information we hold about you is incorrect, inaccurate or out of date you may request that we correct the information. If appropriate we will correct the personal information. We aim to provide you with details about whether we have corrected the personal information within 30 days of receiving your request.

We may need to consult with other entities as part of our investigation.

If we refuse to correct personal information we will provide you with our reasons for not correcting the information.

## Sensitive information

We will only collect sensitive information about you with your consent. Sensitive information is personal information that includes information relating to your racial or ethnic origin, political persuasion, memberships in trade or professional associations or trade unions, sexual preferences, criminal record, or health.

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#### How safe and secure is your personal information that we hold?

We will take reasonable steps to protect your personal information by storing it in a secure environment. We may store your personal information in paper and electronic form. We will also take reasonable steps to protect any personal information from misuse, loss and unauthorised access, modification or disclosure.

### Complaints

If you are dissatisfied with how we have dealt with your personal information, or you have a complaint about our compliance with the Privacy Act, you may contact our complaints officer by email at: enquiries@assuredpropertygroup.com.au.

We will acknowledge your complaint within seven days. We aim to provide you with a decision on your complaint within 30 days.

If you are dissatisfied with the response of our complaints officer you may make a complaint to the Privacy Commissioner which can be contacted on either <a href="https://www.oaic.gov.au">www.oaic.gov.au</a> or 1300 363 992.

#### Further information

You may request further information about the way we manage your personal information by contacting us at enquiries@assuredpropertygroup.com.au.

# Change in our privacy policy

We are constantly reviewing all of our policies and attempt to keep up to date with market expectations. Technology is constantly changing, as is the law and market place practices.

As a consequence we may change this privacy policy from time to time or as the need arises.

You may request this privacy policy in an alternative form.

This Privacy Policy came into existence on 29th November 2017.

