

J A S

S T E P H E N S

## Jas Stephens Real Estate Privacy Policy

In this policy, "us", "we" or "our" means Jas Stephens Real Estate Pty Ltd. We are bound by the *Privacy Act 1988 (Cth)* and have a set of principles consistent with the *Australian Privacy Principles*, as contained in the Act and amended in March 2014.

We may, from time to time, review and update this policy, including taking account of new or amended laws, new technology and/or changes to our operations. All personal information held by us will be governed by the most recently updated policy. (For further information go to [www.oaic.gov.au/privacy/australian-privacy-principles](http://www.oaic.gov.au/privacy/australian-privacy-principles)).

This policy sets out:

- the kinds of personal information we collect and hold;
- how we collect and hold personal information;
- the purposes for which we collect, hold, use and disclose personal information;
- how individuals may access personal information about themselves that is held by us and if necessary seek the correction of such information;
- how an individual may complain about a breach of the Australian Privacy Principles and how we deal with such a complaint;

### PERSONAL INFORMATION DEFINITION

When used in this policy, the term "personal information" has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. This may include (but is not limited to) your name, age, gender, postcode and contact details (including phone numbers and email addresses) and possibly financial information.

### INFORMATION THAT MAY BE COLLECTED AND HELD

We may collect the following types of personal information:

- name;
- mailing or street address;
- email address;
- telephone number;
- age or birth date;
- profession, occupation or job title;
- details of past dealings you have had with us or which you have enquired about;

## COLLECTION OF PERSONAL INFORMATION

We collect your personal information directly from you unless it is unreasonable or impractical to do so.

We do this in ways including:

- through our website;
- from Open For Inspections (OFI's);
- during negotiations with us when renting or buying a property;
- when we inspect a property for rent or sale
- from client events and functions;
- through use of real estate websites;
- through your access and use of our website, apps or sending SMS to us;
- through someone else who has provided us with your information (e.g. a referral);

We may also collect personal information from third parties such as contractors or business partners.

## COLLECTION, STORAGE, USAGE AND DISCLOSURE OF PERSONAL INFORMATION

The primary purpose for which we collect information about you is to enable us to perform our business activities and functions and to provide best possible quality of client service. We collect, hold, use and disclose your personal information for the following purposes:

- to provide services to you;
- to provide you with news, information or advice about our existing and new services;

- to provide you with news and information on real estate related matters;
- to communicate with you including by email, social media, mail or telephone;
- to personalise and customise your experience;
- to conduct promotions;
- to verify your identity;
- to provide - as part of our business - data to third parties if you have authorised us to do so;
- for our administrative, marketing (including direct marketing), promotional, planning, product/service development, quality control and research purposes, or those of our contractors or external service providers;
- to provide your updated personal information to us, our contractors or external service providers;
- to investigate any complaints about or made by you, or if we have reason to suspect that you are in breach of any of our terms and conditions or that you are or have been otherwise engaged in any unlawful activity; and/or
- as required or permitted by any law (including the Privacy Act).

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

## DISCLOSING YOUR PERSONAL INFORMATION

We may disclose your personal information to:

- our employees, contractors or external service providers for the operation of our websites or our business, fulfilling requests by you, and otherwise provide products and services to you, including without limitation, web hosting providers, IT systems administrators, printers, sign board companies, copywriters, photographers, debt collectors, solicitors and consultants;
- specific third parties authorised by you to receive information held by us;
- the police, any relevant authority or enforcement body, or your Internet Service Provider or network administrator, for example, if we have reason to suspect that you have committed a breach of any of our terms and conditions, or have otherwise been engaged in any unlawful activity, and we reasonably believe that disclosure is necessary;
- as required or permitted by any law (including the Privacy Act).

## DIRECT MARKETING MATERIALS

We may send you direct marketing communications and information about services (including specific properties), that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, social media or email, in accordance with applicable marketing laws, such as the Spam Act 2004 (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.

In addition, at any time, you may opt-out of receiving marketing communications from us by contacting us (details below) or by using the opt-out facilities provided (e.g. an unsubscribe link). We will then ensure that your name is removed from our mailing list. We do not provide your personal information to other organisations for the purposes of direct marketing unless expressly authorised by you.

If you receive communications from us that you believe have been sent to you other than in accordance with this policy, or in breach of any law, please contact us using the details provided below.

## ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

You may request access to any personal information we hold about you at any time by contacting us (details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We will not charge for simply making a request and will not charge for making any corrections to your personal information. If you make an access request, we will ask you to verify your identity. There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others, or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment, then we will add a note to the personal information stating that you disagree with it.

Members of our websites will generally be able to access and update their membership details online. We request that you keep your information as current as possible so that we may continue to improve our service to you.

## SECURITY

We will take all reasonable steps to protect the personal information that we hold from misuse, loss, or unauthorised access, including by means of firewalls, password access, secure servers and encryption of credit card transactions.

If you suspect any misuse or loss of, or unauthorised access to, your personal information, please let us know immediately.

## LINKS

Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

# COMPLAINT PROCEDURE

If you believe your privacy has been breached by us or have any questions or concerns about our Privacy Policy, please contact us using the contact information below and provide details of the incident so that we can investigate it.

We have a formal procedure for investigating and dealing with privacy breaches. Once the Privacy Officer receives a complaint, whether it is in writing or verbal means, the Privacy Officer will commence an investigation. We will endeavour to resolve all investigations in a timely manner and advise you of the outcome.

We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint for further information and/or to outline options regarding how the matter may be resolved.

Please contact our Privacy Officer at:

Privacy Officer  
Jas Stephens Real Estate  
104 Somerville Rd  
Yarraville 3013

Tel: 9316 9000

Email: [privacy@jasstephens.com.au](mailto:privacy@jasstephens.com.au)

**This policy was last updated July 2021**