

Walkom Real Estate **PRIVACY POLICY**

1. Privacy Statement

Walkom Real Estate including collect and handle your personal information in accordance with our Privacy Policy. If you provide us with your details, we may contact you about our property listing, promotions, and related products and services. We may use your personal information within Walkom and disclose it to our authorised representatives and service providers who act on our behalf, to fulfil the purpose for collecting your information. Our service providers may have servers located overseas such as in USA, Europe, Philippines and Japan, and you consent to these overseas disclosures. Without your information, we may not be able to provide you with services and you may miss out on receiving valuable information from us. We do not collect sensitive information about you unless you provide it to us voluntarily. You have a right to access your personal information that we hold and may ask us to correct this. Our Privacy Policy below contains more detail on your rights and contact details for questions or complaints.

Last Updated: November 2020

2. Privacy Policy

1) Introduction

Richard Walkom Linehans Real Estate PL trading as Walkom Real Estate A B N 85254464202 (known as 'Walkom') respect the importance of protecting your privacy. We comply with our obligations under the Privacy Act 1998 (Cth) (**Privacy Act**), including the Australian Privacy Principles (**APPs**) as well as the Privacy (Credit Reporting) Code 2014 (**CR Code**).

This Privacy Policy describes how Walkom collects, handles, uses and discloses your personal information. By providing us with your personal information, you consent to us using and disclosing it for the purposes set out in this Privacy Policy. We will update this Privacy Policy when our information handling practices change, or when required. Any revised Privacy Policy will take effect when it is published on our website.

2) Our functions and activities

We collect, hold, use and disclose your personal information so that we can perform our functions and activities and provide best possible customer service. Our collection, use and disclosure of your personal information will depend on our relationship with you, the circumstances of collection and the type of products and service you request from us. We may collect, hold, use and disclose your personal information for the following purposes:

- To provide and administer our products and services, including market properties for vendors and landlords, facilitate transactions for sales and leasing, assess and originate your application for finance or mortgage

- insurance and manage that finance, property concierge services, verify your identity, conduct credit checks and process payments if applicable;
- To respond to your submissions and enquiries about our products and services and property listings;
 - To provide customer support, including conducting, investigating and responding to enquiries, surveys, feedback, comments and complaints;
 - To distribute our newsletters and other communications either alone or with the assistance of service providers on information about us, our conferences, training and events, our property listings and our related products and services;
 - To plan, market, host and facilitate our conferences, training sessions and events;
 - To inform and conduct marketing activities including to promote our products and services;
 - To conduct research about your interests and attitudes towards our products and services to improve our products and services, marketing activities and customer experience;
 - To assess the performance of our websites and improve the operation of the websites;
 - To perform data analyses and generate customer insights which may include combining personal information received from reputable data sources and public sources of information;
 - To manage and carry out our business and operational functions, including HR management, business decisions and assessing your suitability for appointment as a franchisee or contractor agent or broker;
- To maintain records and comply with our legal obligations.

3) Information we collect

Personal information is any information about you, from which you can be identified. We may collect your name, address, postcode, email address, date of birth, gender, employment, telephone number, property details, payment details and proof of identity such as your driver licence or passport number. We may collect additional personal information from you from time to time.

Personal information we collect about you may also include credit-related personal information. Credit-related information is information used and disclosed to assess your creditworthiness, assess your application for finance and manage that finance. The types of credit-related personal information that we collect about you may include your credit liability information, repayment history information, the type and amount of finance you are applying for, court proceedings, insolvency actions and credit worthiness.

We generally do not collect sensitive information about you, unless you provide it to us voluntarily. For example, when you interact with one of our agents or brokers, you may provide sensitive information such as racial or ethnic origin, sexual orientation, health information, religious or philosophical beliefs or political opinion and membership or

affiliation information. You consent to us collecting sensitive information which you provide to us voluntarily. If we need to collect any sensitive information for a specific purpose, we will ask for your consent.

If you are an employee or prospective employee, we may need to collect sensitive information about you and you consent to us collecting this information. For example, personnel records may include sensitive information such as place of birth, racial or ethnic origin, criminal record, tax file number, disabilities and relationship information. Recruitment records may include employment history and experience, referees and other employment related information.

If you provide us sensitive information, we will treat it as personal information and handle it in accordance with this Privacy Policy.

If you are a shareholder or prospective investor, we (or our agent) will collect certain details about you for registration purposes, such as your name, address, number of shares held, tax file number and bank account details.

You don't have to give us all the information we request. However, if you do not provide us with some or all of the personal information required, we may not be able to provide you with the products and services or information you request, to the requested standard or at all, and you may also miss out on receiving valuable information about us and our products and services.

4) How we collect information

Where we can, we will collect information directly from you. We collect personal information when you:

- Request us to provide our products and services or information about our products and services, including sales, and leasing;
- Contact us to make an enquiry about our listed properties or our products and services, including online, over the phone or in person;
- Subscribe to communications from us such as updates, publications or newsletters;
- Tell us about your preferences when making an enquiry or using our products and services;
- Contact us to provide feedback, comments or suggestions on our functions and activities or complete one of our surveys;
- Interact or engage with us through our websites or social media platforms;
- Register, attend or present at one of our conferences, training sessions and events;
- Attend property inspections or visit our offices, including via manual sign-in and security surveillance of our offices;
- Apply for a job with us or become an employee, or become a supplier or contractor that provide a product or service to Walkom;
- Otherwise interact with us or disclose your personal information to us.

As well as collecting information directly from you, there may be occasions when we may collect information about you from other people or organisations. We may combine this information with information we already have about you to help us understand trends, attributes, behaviour and preferences. Where we receive information about you indirectly from service providers, we require that the service provider has collected and disclosed that information in accordance with the Privacy Act.

Walkom may collect information about you from:

- Credit reporting bodies and providers, law enforcement agencies and government agencies to verify your identity or assess your credit worthiness;
- Reputable data sources and publicly available sources of information;
- Your representatives (lawyers, mortgage broker, accountants and financial advisors);
- Your nominated referee or employer when you apply to rent a property or for finance;
- Service Providers that provide marketing leads, marketing and data analysis services to us;
- Service Providers that conduct our surveys for us;
- Speaker management companies if you present at one of our conferences, training sessions or events;
- If you are a prospective employee, your nominated referee, law enforcement agencies for police checks or intermediaries such as recruitment agents and personnel providers.

5) Cookies and other analytics tools: how we use them

Walkom may use cookies and online behavioural tracking tools, such as web beacons, pixels, device identifiers and web server logs, to collect, store and monitor visitor traffic information and actions on our website. Cookies are small data files which are placed on your computer that allows our websites to “remember you” when you return to our websites. These cookies and tools are not used to record any personal information.

Services other than Walkom may leave cookies in your browser. They may have their own privacy policies that govern their use of cookies. The information collected by these tools may include geolocation data, the IP address of the device you are using and information about websites that the IP address has come from, the pages accessed on our website and the next website visited.

Walkom may use and combine this information to maintain, secure and improve our websites, enhance your experience when using our websites, display and deliver relevant content, services and advertising and understand the effectiveness of our marketing and advertising (including direct marketing and online ads on external websites).

If you want to prevent cookies being used, you can change your browser settings to disable cookies. However, this might mean that your access to parts of our website is

limited, or you may experience reduced functionality when accessing certain website functions.

Our website uses Google Analytics, a web analytics service provided by Google, Inc. Google Analytics uses cookies to help the website analyse how users use the website. The information generated by the cookie about your use of our website (including your IP address) will be transmitted to and stored by Google on servers in the United States of America.

Google will use this information for the purpose of evaluating your use of our website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google.

By using our website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

Google's ability to use and share information collected by Google Analytics is restricted by the Google Analytics Terms of Use (<http://www.google.com.au/analytics/terms/us.html>) and Privacy Policy (www.google.com.au/policies/privacy)

6) Disclosure of personal information

Walkom may disclose your personal information and credit-related information within the Walkom group including to our officers, employees, agents, brokers and contractors.

We may disclose your personal information and credit-related information as part of our functions and activities, including:

- To the other parties in any real estate transaction including developers, vendors, landlords, purchasers and tenants, and their authorised representative;
- To guarantors, other mortgage intermediaries, lenders, financial institutions, insurers, valuers and credit reporting bodies and providers;
- To your authorised representatives (lawyers, mortgage brokers, accountants and financial advisors);
- To regulatory bodies, government agencies and law enforcement bodies in any jurisdiction;
- To the relevant government agency for verification of attendance at conferences and training sessions for continuing professional development requirements;
- To debt collectors and utility companies;
- To our suppliers and service providers that provide products and services to assist us to perform our functions and activities such as marketing, events, recruitment, HR and share registry management; and
- When we may be required by law from time to time.

Walkom collects information from various on-line platforms and services, such as Facebook and Google. Users of these platforms and services may elect to send information to Walkom from the platform. Walkom uses this information strictly in accordance with the terms imposed by that platform; this Policy; and the purposes for which the information was collected.

Walkom never sells or monetises your personal information.

Some of the service providers we disclose your personal information to may have servers located overseas in various countries, including USA, Europe, Japan and Philippines.

We require that all of those to whom we disclose personal information or who may have access to personal information, have appropriate controls to protect your personal information in a manner that is consistent with our Privacy Policy, including in relation to security and confidentiality. They must only use your personal information for authorised purposes.

7) Direct Marketing

Walkom may, from time to time, send direct marketing communications to you about us and our products and services, our property listings and other material that we consider you would find interesting or useful. If you do not wish to receive such direct marketing communications, you can always opt out. If you are receiving email communications from us, there will be a mechanism to opt out contained in each of those emails. To stop receiving other communications from us, you can contact us via any of the channels listed below.

If you choose to opt out of all direct marketing communications, please note that Walkom may still contact you for other reasonable purposes, including information that Walkom is legally required to send, notifications of changes to Walkom products and services or policies and information regarding the use, rights, benefits or obligations of customers of our products and services.

8) How we hold information and keep it secure

Walkom holds your personal information both electronically, on our own servers and those of our service providers, and in hard copy at our secured offices.

Walkom takes the security of your personal information seriously and we implement a range of technical, administrative, personnel and physical measures to safeguard your personal information against loss, interference and unauthorised access, modification and disclosure, and misuse, including using electronic and physical access restrictions to files containing personal information and ensuring encryption of personal information sent and received.

9) Access and correction of information about you

It is important to us that the information we hold about you is up-to-date, accurate and complete, and we will try to confirm your details through our communications with you and promptly add updated or new personal information to existing records when we are advised. If any of your details change, please notify us as soon as you can. If you believe we are holding information about you that is inaccurate, incomplete, irrelevant or misleading, you can ask us to correct it, or delete it altogether.

If you would like to access your personal information, or ask us to update, correct or delete it, you can do so by contacting us in writing and verifying your identity. We will do our best to respond to your request within 30 days.

We will only refuse access in exceptional circumstances, and if this is the case, we will advise you of our reasons for doing so.

We may charge a fee for searching for, and providing access to, your information on a per request basis.

10) Privacy complaints and further information

We take your complaints seriously and will attempt to resolve your issue quickly and fairly.

If you believe that Walkom has breached the APPs, or you have a complaint about how we handle your personal information:

- You may make a complaint addressed to the Walkom Privacy Officer. The complaint must identify you and be in writing.
- The Walkom Privacy Officer will investigate your complaint and will endeavour to provide a response setting out Walkom's decision in writing within 30 days of receipt of your complaint.
- If Walkom is unable to satisfactorily resolve your concerns you can contact the Office of the Australian Information Commissioner on their website www.oaic.gov.au.

11) Our contact details

If you require any further information or have any questions about this Privacy Policy or if you wish to access or correct your personal information or make a complaint about our handling of that information, please contact the Walkom Privacy Officer as follows:

Email: Scott.walkom@walkom.com.au

Telephone: 0249748900

Post: The Privacy Officer
 Walkom Real Estate
 PO Box 1799
 NEWCASTLE NSW 2300

12) Disclaimer

Walkom endeavours to ensure that the information provided on this website is correct at the time of publication. However, Walkom does not warrant, guarantee or make representations regarding the currency, correctness, accuracy or suitability for a particular purpose of the information contained on this website.

The user accepts sole and full responsibility and risk associated with the use of this website and use of or reliance on any information contained within this website. Walkom does not accept any responsibility or liability for any direct or consequential loss, damage or inconvenience suffered or incurred as a result of use of this website, or use of or reliance on information contained within this website.

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