

Privacy Policy

Privacy Policy

Definitions:

For the purposes of this document please note that the following definitions apply:

"Bevan", and "Bevan Property Group", "Bevan Group", and "we", refer to both Bevan Property Group Pty Ltd trading as Bevan Property Group ACN: 620575993, and, Bevan Real Estate Pty Ltd trading as Bevan Residential & Bevan Projects ACN: 622418491

Bevan Property Group and its related entities respect the individual's rights to privacy of their personal information. This Privacy Statement informs you how we go about managing and collecting personal information and what we do to ensure that information is protected.

Bevan Property Group abides by the rights of privacy afforded to individuals under the Australian Commonwealth Privacy Act 1988 and ensures that all personal information we gather is handled in accordance with The Act and that we meet the requirements laid out in The Act with respect to the collection, management and disclosure of personal information including the Australian Privacy Principles.

This Privacy Policy is intended to inform you:

- The type of personal information we collect
- How we collect your personal information
- The purposes for which your personal information is used and disclosed
- How you may access, correct or update your personal information
- How your personal information is kept secure
- Complaining about a breach of privacy

When the term "personal information" is used in this privacy policy, the term is commensurate with the definition given to it in The Act. In broad terms, it is any information that can be used to personally identify you. This may include such information as your name, address, telephone number, email address, and profession or occupation. If information we collect personally identifies you, or you are reasonably identifiable from such information, the information is considered to be personal information.



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What personal information do we collect and hold?

Bevan Property Group may collect some, or all, of the following information about you in the event that you are a prospective vendor, current vendor, developer, investor, prospective purchaser, or a landlord of real estate:

- Name, address, telephone number, and email address
- Date of birth or age
- Profession or occupation and job title
- Current driver's license number
- Property ownership details - this may include details of properties previously sold or purchased, and current holdings
- Prospective property ownership details
- Additional information relating to you that you have provided directly to us, through our website, via conduct of business with our representatives, or from customer surveys
- Additional information relating to you obtained indirectly from third-parties

Bevan Property Group may also collect some or all of the following information about you in the event you are a current or prospective tenant for a rental property managed by us:

- Passport and other forms of identification
- Employment details including employment status, employer, salary, term of employment
- Supplementary sources of income
- Personal and financial referees who may be contacted about applications

We may also collect information that is not personal information as it does not identify you. An example of this type of information may be answers to anonymous surveys or aggregated statistical information about users from Our Website.

How we collect your personal information?

Bevan Property Group collects personal information directly from you unless it is impracticable or unreasonable to do so. We may collect personal information directly from you in various ways:

- When you correspond with us by post or by email
- When you complete our forms
- When you access and use our website
- During business conversations between you and our representatives
- When you enter competitions, promotions
- When you complete surveys or other market feedback information
- When you request information or material from us, completing surveys or providing feedback



Bevan Property Group may also collect information about you from the third-party sources:

- Public domain databases such as White Pages, Australia Post DPID, State and Territory Titles Offices and independent property databases
- Your own professional representatives such as accountants, lawyers, and financial advisers
- Your employer
- Services and Solutions Limited (Veda)
- The National Tenancy Database (NTD) operated through Veda Advantage Information
- Law enforcement offices and other government agencies and entities
- Referrals and / or recommendations from our existing clients
- Any other organisation where you have provided your explicit consent

In the event that you use Our Website we may also collect information through the use of cookies. When you access Our Website, we may send a "cookie" to your internet-enabled device. A cookie in this context is a very small file containing a unique ID number which enables us to recognise the device on which it resides. It also enables us to keep track of products or services you view so that we can enhance your user experience on Our Website. This enables us to better tailor our online platforms to suit the habits of our visitors. Our cookies do not harvest your personal information from your device.

We may log IP addresses (Internet Protocol addresses; the electronic addresses of computers connected to the internet) to analyse usage trends, administer Our Website and to harvest some broad geographic and demographic information.

Note that almost all devices and internet browsers offer ways to reject cookies if that is your preference. There are also specific software products designed to preserve your anonymity online. In the event you use these type of products, please be aware that it is possible some of the following consequences may occur:

- Not all requested services or products may be available to you
- It may not be possible to provide you with information, products, and / or services you wish access to
- Your content and preferences for Our Website may not be able to be stored for your future visits



For what purposes do we collect, hold, use and disclose your personal information?

Bevan Property Group collects personal information in order to perform our routine business activities and in order to continuously revise our service delivery in order to deliver the best possible quality of customer experience.

We collect, store, analyse, and disclose your personal information for the following purposes:

- To conduct our normal business processing functions including provision of personal information to our related bodies corporate, contractors, service providers or other third parties
- For the purposes of administration, product development, marketing, planning, quality control, and research
- For tenancy verification and identity purposes
- To provide our business products, information, and services to you
- To provide requested information and respond to queries
- To facilitate access to secure or protected areas of Our Website
- To continuously assess the performance of Our Website to improve its operation
- To provide your updated personal information to our related entities, contractors and / or service providers
- To ensure currency of your records within our organisation
- To respond and to try to resolve any complaint made by you
- For compliance with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in cooperation with any governmental authority of any country or of a political subdivision of a country
- Bevan Property Group will not disclose, share, lease, sell, or rent your personal information other than as described in this Privacy Policy

Who is your personal information disclosed to?

Your personal information may be disclosed to our employees, related corporate entities, contractors, service providers, franchisee's, and / or franchisor's real estate agents.

This information is used for the purposes of the operation of Our Website, our normal business, fulfilling your requests, and to otherwise provide products and services to you.

Your information may also be disclosed to the following parties including, without limitation, web hosting providers, I.T. systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes.

If you are a current or prospective tenant of a rental property, we may also disclose your personal information to the National Tenancy Database (NTD) for tenancy verification and identity purposes.



You can contact the NTD at:

<https://www.tenancydatabase.com.au/contact-us>

Veda's personal information management policy on the NTD can be accessed through its website:

<https://www.equifax.com.au/privacy>

Bevan Property Group's disclosures of your personal information to third parties are undertaken on a confidential basis and in accordance with The Act and any other relevant legislation.

Bevan Property Group may also disclose your personal information with your consent or if disclosure is required or authorised by law or any other binding statutory instrument.

If Bevan Property Group wishes to disclose or use your personal information in any other manner than described above, it will not do so unless it:

- ♦ Obtains or has your express consent to do so
- ♦ Has established reasonable grounds to believe that use or disclosure is necessary to prevent a threat to life or health
- ♦ Has established reasonable grounds to believe that use or disclosure is required by law or to enforce the law

Bevan Property Group may choose to combine or share any information that we collect from you with information collected by any of our related entities.

Direct marketing materials

Bevan Property Group may send you direct marketing communications regarding our products and services. These communications may be in the form of postal mail, SMS, facsimile, and / or email, in accordance with relevant marketing laws including the Spam Act 2003. Where a preference for a mode of communication has been indicated, we will endeavour to use that method whenever practical to do so. You may, at any time, opt-out of receiving marketing communications from us by contacting us or by using opt-out facilities provided in the marketing communications and we will then endeavour to ensure that you are removed from future marketing lists.

How can you access and correct your personal information?

You may request access to any personal information we hold about you by contacting us and by having satisfactorily identified yourself to us. Where we hold information that you are entitled to access, we will endeavour to provide you with a suitable method of accessing the information. We may levy a fee to cover the reasonable costs incurred in providing the information to you. No fee will be levied for the submission of the request or for the correction of erroneous details.



You may make a request to amend the personal information we hold about you if you believe the information is incorrect, incomplete or inaccurate. In the event that we do not consider the grounds for the amendment request to be justified, no amendment will be made, however your records will be annotated to reflect that you disagree with it.

We will endeavour to respond to your request to access or correct your personal information within 30 days of receipt of your request. If your request to access or correct your personal information is refused, we will provide you with a written explanation of the reasons for the refusal and details of complaint mechanisms.

There are some situations in which Bevan Property Group may not be able to provide access to information. This includes but is not limited to:

- ♦ Any situation whereby reasonable grounds have been established that providing access may create a serious threat to the life or health of any individual or may be an unreasonable intrusion into the privacy of another individual
- ♦ Any situation in which reasonable grounds have been established that your request for access is frivolous or vexatious
- ♦ Any situation where providing access would be unlawful, may prejudice an investigation of possible unlawful activity, may prejudice enforcement of law, or denying access is specifically authorised by law

What is the process for complaining about a breach of privacy?

If you believe that your privacy has been breached, please contact us, providing details of the alleged breach, so that the matter can be investigated.

Bevan Property Group undertakes that all breach of privacy complaints will:

Be treated seriously and dealt with promptly
Be responded to in writing
Not impact upon your dealings with Bevan Property Group

Is your personal information disclosed outside of Australia

Bevan Property Group may disclose your personal information to our related entities and third party suppliers and service providers outside of Australia, for some of the purposes listed above. We take all reasonable steps to ensure that overseas recipients of your personal information act in accordance with this policy and with all relevant legislation.



Is my personal information stored securely?

Bevan Property Group takes all reasonable steps to ensure that your personal information it has collected, uses or discloses is stored in a secure manner and is accessed only by authorised persons in order to prevent interference, misuse, loss, unauthorised access, modification or disclosure.

In the event that your personal information is no longer needed for any purpose, all reasonable steps will be taken to destroy and / or permanently erase the information in such a way as to ensure it is not recoverable.

Bevan Property Group endeavour to provide a secure physical office environment in addition to robust, secure, reliable data systems. However no system yet created can be accurately described as completely secure. While we take all reasonable caution to ensure the security of personal information held on your behalf, we cannot warranty this to the extent of 100% secure.

Links and Third Parties

Our online presence and / or website may contain links to beyond our control. We therefore make no representation for, or warranties in relation to, the privacy practices of any third party such a link may lead to and we are not responsible for the privacy policies or the content of any third party. Third party websites are responsible for informing you about their own privacy practices.

Contacting us

If you have any questions or concerns about our privacy policy, or any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please contact us at:

Privacy Officer

PO Box 482, Port Melbourne, Victoria, 3207
Email: privacy@bevanpropertygroup.com.au

Changes to our Privacy Policy

This Privacy Policy may change and be updated from time to time and any updates will be posted on Our Website. This Privacy Policy was last updated on March 25th, 2019

