



PRIVACY POLICY AND COLLECTION NOTICE

Smart Accessible Homes Australia Pty Ltd

Saha Property

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PRIVACY POLICY & COLLECTION NOTICE

The Privacy Act 1988 (Cth) (the Act) allows for personal information, including sensitive information (which are defined in the Act), about you to be collected, used and disclosed provided we have provided you with notice and, in certain circumstances, obtained your consent. In this Privacy Policy and, where appropriate, a reference to personal information includes sensitive information.

We may from time to time update, revise, amend or replace this Privacy Policy by posting any changes to it on our website or by giving you any other form of notification.

This Privacy Policy is available on our website, at our office and may also be made available to you when we first communicate with you by email.

What personal information do we collect?

We may collect personal information including:

- Name
- Residential or postal address
- Email address
- Telephone number
- Property enquiry details
- Property ownership details
- Property investment preferences
- Identification documents required for compliance purposes
- Information submitted through website contact forms
- Information provided through email correspondence
- Information provided through realestate.com.au enquiries
- Information provided through social media enquiries and advertising campaigns
- Information required to comply with Anti-Money Laundering and Counter-Terrorism Financing obligations

How we collect personal information from you

We collect personal information from you in the following circumstances:

Property Management

- If you are a prospective or current landlord and want us to manage your property, we will collect personal information from you to identify you and the property.
- If you are a prospective or current landlord and want us to manage your property, we may collect personal information from you to comply with our AML/CTF obligations.
- If you are a prospective or current tenant and inspect a rental property, we may collect personal information when you attend the inspection.
- If you are a prospective or current tenant and wish to rent a property, we may collect personal information from you during the rental application process and from supporting documentation supplied by you. If you become the successful tenant, we may continue to collect personal information during the tenancy or lease period.

Sales

- If you are a prospective or current vendor and want us to act as your sales agent, we will collect personal information from you to identify you and the property.
- If you are a prospective or current vendor and want us to sell your property, we may collect personal information from you to comply with our AML/CTF obligations.
- If you are a prospective or current purchaser and inspect a property, we may collect personal information when you attend the inspection.
- If you are a purchaser, we may collect personal information from you to comply with our AML/CTF obligations.
- Subject to the other provisions of this Privacy Policy, we may also collect personal information when you make enquiries regarding any property or property investment opportunity.

How we collect personal information from other sources

We may collect personal information about you from other sources where it is reasonably necessary for us to provide our services and conduct our business activities.

Examples include:

- Realestate.com.au and other property enquiry platforms
- Referrals from existing clients
- Financial advisers, mortgage brokers and accountants

- Legal representatives and conveyancers
- Social media enquiries and advertising campaigns
- Other parties authorised by you to provide information to us

When the law authorises or requires collection of personal information.

There are laws that may require us to collect and disclose your personal information.

For example, we may be required to collect and disclose personal information pursuant to:

- Property Occupations Act 2014 (Qld)
- Anti-Money Laundering and Counter-Terrorism Financing legislation
- Taxation laws
- Court orders and lawful requests from government authorities
- Any other applicable legislation or regulatory requirements

How your personal information may be used

We may collect, hold, use and disclose your personal information for purposes including:

- Responding to enquiries regarding property investment opportunities
- Identifying and verifying clients and prospective clients
- Providing information regarding DHA investment properties
- Preparing proposals, contracts and related documentation
- Assisting with property purchases and sales
- Complying with legal and regulatory obligations
- Conducting due diligence and identification checks
- Maintaining our customer relationship management systems
- Sending property updates, newsletters and marketing communications (where permitted)
- Improving our website, services and customer experience
- Managing and administering our business operations
- Any other purpose authorised by law or consented to by you

Sales

- to comply with any applicable law in connection with the sale of the property;
- to confirm whether the vendor or purchaser is registered for GST purposes;

Generally

- to allow us to run our business efficiently and to perform administrative and operational tasks;
- to comply with any dispute resolution or other legal process;
- to act on behalf of clients in accordance with any agency agreement and to comply with our obligations under that agreement;
- in order to update our records and your contact details;
- if we enter into or propose to enter into any agreement or arrangement with any party for the purpose of, or in connection with, the acquisition of our business (including any part of our business that includes personal information), then we may provide that party (including its legal, financial and other professional advisers) with personal information in relation to or in connection with those arrangements;
- to comply with the law including our AML/CTF Obligations; and
- any other purpose to which you have consented.

You can tell us at any time if you no longer wish to receive direct marketing information or offers from us. We will process your request as soon as reasonably practicable after receipt of the request.

How we share your personal information

Sharing personal information with third parties

We may seek and use personal information about you from, and use or disclose personal information about you to, third parties in relation to or in connection with the sale and purchase of property, property investment opportunities, or other business and administrative functions.

These third parties may include:

- your representatives, attorneys, lawyers, settlement agents, accountants, brokers;
- buyers' agents, co-operating agents and other property professionals involved in a transaction;
- auctioneers;

- your financier including any mortgage brokers assisting with a loan application or finance approval;
- valuers, surveyors, insurers, claim assessors and investigators;
- financial institutions including deposit-taking institutions;
- law enforcement agencies;
- government and regulatory authorities, including the Australian Taxation Office (ATO), AUSTRAC and other bodies where disclosure is required or authorised by law;
- mailing houses and marketing service providers that assist us to communicate with you;
- if we enter into, or propose to enter into, any agreement or arrangement in connection with the acquisition or sale of our business, professional advisers involved in those arrangements;
- service providers including IT providers, cloud storage providers, data consultants, contractors and advisers who assist us to conduct our business.

Sharing personal information with related companies

We may share personal information about you with our related companies for any of the purposes described in this Privacy Policy.

Sharing personal information outside Australia

We may store information about you using cloud-based or electronic storage systems. As electronic storage systems may be accessed from various countries, it is not always practical to know the exact location where information is stored.

We will take reasonable steps to ensure that any overseas organisation that receives your personal information complies with the Privacy Act 1988 (Cth).

If you do not provide personal information

If you do not provide personal information to us, we may not be able to provide you with the services you have requested.

For example:

- we may be unable to respond to your enquiry regarding a property investment opportunity;
- we may be unable to assess your suitability for a property purchase;
- we may be unable to verify your identity where required by law;
- we may be unable to comply with our AML/CTF obligations;

- we may be unable to provide information, updates or services you have requested; and
- we may be unable to complete property transactions or related administrative processes.

Personal information about other people

If you provide us with personal information about another person in relation to, or in connection with, a property transaction or enquiry:

- we are entitled to assume that you have obtained their consent to provide that information to us;
- you must inform them that we hold their personal information and that they may contact us for further information about our privacy practices.
- we have collected their personal information for the purposes set out in this Privacy Policy;
- we may exchange their personal information with other organisations for the purposes set out in this Privacy Policy;
- we will handle their personal information in the same way as set out in this Privacy Policy and they can:
 - access or request a copy of this Privacy Policy; or
 - access the personal information we hold about them.

Anonymity and pseudonymity

Where practical, you may deal with us anonymously or by using a pseudonym. However, in many circumstances we may need to identify you in order to provide services, respond to enquiries, verify identity requirements, or comply with legal obligations.

However, where possible, we can provide information of a general nature to unidentified individuals. If an individual makes an enquiry by email, telephone or other electronic means, the method of communication itself may identify that individual.

Information security

We take reasonable steps to protect all information which we hold (including any personal or sensitive information) from misuse, loss, unauthorised access, modification or disclosure.

Marketing and opt-out

We may use personal information (excluding sensitive information) provided by you for marketing, research and business development purposes, to improve our services, and to inform you of products, services and opportunities that may be of interest to you.

We will not use your sensitive information for marketing purposes without your consent.

You may opt out of receiving marketing communications from us at any time by contacting us using the details provided below or by using the unsubscribe facility included in our communications where available.

Accessing your Personal Information

Unless we are entitled to withhold access to your personal information, you have the right to request access to any personal information held by us which relates to you.

We may charge a reasonable fee where access to personal information is provided.

Any requests for access to your personal information should be made in writing to the Privacy Officer (details specified below).

You also have the right to request correction of any personal information which relates to you that is inaccurate, incomplete, irrelevant, misleading or out-of-date.

If you require any further information about our management of personal information or have any queries or complaints, you should contact:

The Privacy Officer

David Clynch

Smart Accessible Homes Australia Pty Ltd

Saha Property

Unit 3/54 Bronte Road, Bondi Junction NSW 2022

0408 227 802

davidc@saha.property

The Office of the Information Commissioner can be contacted as follows:

Phone enquiries	1300 363 992 Mon–Thurs 10am–4pm AEST/AEDT
Online enquiries	Enquiry form
Post	GPO Box 5288 Sydney NSW 2001
Fax	+61 2 9284 9666