DOWLING
PROPERTY

Privacy Package

16a William Street, Raymond Terrace NSW 2324
office@dowlingterrace.com.au
02 4987 2226
www.dowlingterrace.com.au
ABN 29 101 237 281

Privacy Package

Dowling Real Estate (Raymond Terrace) Pty Ltd

Purpose

This Privacy Package has been prepared to align Dowling Property's privacy framework with the requirements of the Privacy Act 1988 (Cth), the Australian Privacy Principles (APPs), and the most recent guidance and templates issued by the Real Estate Institute of NSW (REINSW). It is designed to withstand OAIC audit scrutiny by demonstrating that privacy compliance is not only documented, but actively implemented in practice.

Contents of this Privacy Package

This package includes the full suite recommended by REINSW:

1. General Website Privacy Policy
2. Privacy Policy & Collection Notice (Real Estate Business)
3. Internal Privacy Compliance Plan
4. Personal Information Request for Access / Request for Correction Form
5. Data Breach Response Plan (Internal)

1. General Website Privacy Policy

Scope

This policy applies **only** to personal information collected via the Dowling Property website and related online services. It does **not** replace or override the Privacy Policy & Collection Notice that applies to Dowling Property's real estate operations.

Information Collected via the Website

Dowling Property may collect the following types of personal information when users interact with the website:

- Full name
- Email address
- Phone number
- Property enquiry details

- IP address
- Browser type and operating system
- Device identifiers
- Date, time, and pages visited
- Referring URLs

How Website Information Is Collected

Information is collected when users:

- Submit enquiry or contact forms
- Subscribe to email communications
- Interact with embedded property listings or portals
- Navigate the website (via cookies and analytics tools)

Purpose of Website Collection

Website information is collected to:

- Respond to enquiries and requests
- Provide requested real estate information
- Improve website functionality and usability
- Monitor website performance and security
- Meet legal and regulatory obligations

Cookies and Analytics

Dowling Property uses cookies and similar technologies to:

- Track website traffic and usage patterns
- Improve user experience
- Maintain session integrity

Cookies do not identify individuals personally. Users may disable cookies through their browser settings; however, this may affect website functionality.

Overseas Disclosure

Website data may be stored using cloud-based hosting and analytics services. As a result, personal information may be accessed from overseas locations. Dowling Property takes reasonable steps to ensure that overseas service providers handle personal information in a manner consistent with the Australian Privacy Principles.

Overseas Disclosure

Reasonable technical and organisational safeguards are implemented to protect website information from unauthorised access, loss, misuse or disclosure.

Access, Correction and Complaints

Individuals may request access to or correction of personal information collected via the website, or make a privacy complaint, by contacting:

Kate Organ - **Privacy Officer**
Email: kate@dowlingterrace.com.au
Address: 16A William Street, Raymond Terrace NSW 2324

2. Privacy Policy & Collection Notice

This policy applies to all personal information collected, held, used and disclosed by Dowling Real Estate (Raymond Terrace) Pty Ltd ABN 29 101 237 281 trading as Dowling Property.

What Is Personal Information

For the purposes of this policy, personal information has the meaning given under the Privacy Act 1988 (Cth) and includes any information or opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in material form or not.

What Personal Information We Collect

In the course of operating our real estate business, we may collect the following categories of personal information:

- Identification information (name, date of birth, photographic ID)
- Contact details (residential address, postal address, email, phone numbers)
- Financial information (bank account details, rental payments, bond and trust account records)

- Rental application information (employment details, income, references, tenancy history)
- Sales transaction information
- Strata and trust accounting records
- Correspondence and communications (email, phone, written records)
- Inspection attendance records
- Credit-related information (where applicable and permitted by law)
- Government-related identifiers **only where required or authorised by law**

Sensitive information will only be collected where it is reasonably necessary and with consent or where otherwise permitted by law.

How We Collect Personal Information

We collect personal information:

- Directly from individuals via application forms, inspection registers, emails, phone calls and online enquiries
- During property inspections, auctions and open homes
- From referees, employers, landlords and agents
- From public registers and government bodies where permitted
- Through authorised software platforms used by Dowling Property

Dowling Property Systems and Software

Dowling Property collects and stores personal information using the following core systems:

- **Property Tree** – property management, tenancy administration and trust accounting
- **IRE** – inspection reporting, condition reports and photographic records
- **LockedOn** – inspection bookings, access control and attendance management

These systems may store information electronically and may use cloud-based infrastructure. Dowling Property takes reasonable steps to ensure all providers maintain appropriate privacy and data security standards.

Purposes for Collection, Use and Disclosure

Personal information is collected, used and disclosed for purposes including:

Property Management

- assessing and processing tenancy applications
- managing tenancy agreements and ongoing tenancies
- collecting rent and managing trust monies
- conducting inspections and maintenance coordination

Sales

- marketing and selling properties
- managing buyer and seller communications
- facilitating contracts and settlements

Strata / Trust / General Operations

- trust accounting and compliance
- record keeping and internal administration
- compliance with NSW Fair Trading, taxation and regulatory requirements

General Business Purposes

- responding to enquiries
- dispute resolution and legal processes
- limited direct marketing (subject to opt-out)

Disclosure of Personal Information

We may disclose personal information to:

- landlords, tenants, buyers and sellers
- contractors and tradespeople
- financial institutions and insurers
- government and regulatory bodies (including NSW Fair Trading and ATO)
- IT, cloud and software service providers
- professional advisers (lawyers, accountants, auditors)

Overseas Disclosure

Personal information may be stored using cloud-based systems that can be accessed from overseas. Where this occurs, Dowling Property takes reasonable steps to ensure overseas recipients handle information consistently with the Australian Privacy Principles.

Credit-Related Information

Where applicable, Dowling Property may collect and handle credit-related information in accordance with the Privacy Act 1988 (Cth) and the Privacy (Credit Reporting) Code. Credit information is handled securely and only disclosed where permitted by law.

Direct Marketing

Dowling Property may use non-sensitive personal information to promote its services where permitted. Individuals may opt out at any time. Sensitive information is never used for marketing purposes.

Access and Correction

Individuals may request access to or correction of their personal information in accordance with APPs 12 and 13 using the REINSW-approved request form.

If an individual is not satisfied with our response, they may lodge a complaint with the Office of the Australian Information Commissioner (OAIC).

3. Internal Privacy Compliance Plan

This Internal Privacy Compliance Plan is prepared in accordance with **APP 1.2** and the **REINSW Compliance Plan**. It demonstrates how Dowling Property actively implements privacy compliance in practice.

Governance and Responsibility

- Dowling Property appoints a **Privacy Officer** responsible for privacy compliance, access requests, complaints and breaches
- Senior management is responsible for ensuring privacy compliance is embedded into business operations
- Privacy obligations form part of staff roles and performance expectations

Staff Training and Awareness

- Privacy training is provided during staff induction
- Refresher training is conducted periodically and when legislation changes
- Staff are trained on appropriate in-person information collection practices
- All staff are required to maintain the confidentiality of personal information and comply with Dowling Property's privacy policies as a condition of employment.

Collection Controls (In-Person and Digital)

To address OAIC and REINSW guidance:

- Only information reasonably necessary for business purposes is collected
- Staff must explain why information is being collected at inspections and open homes
- Printed privacy collection notices are available at inspections
- No coercive, excessive or unnecessary information collection is permitted

Information Security Measures

Dowling Property implements reasonable security safeguards, including:

- Password-protected systems and role-based access
- Secure cloud-based platforms
- Locked offices and filing cabinets for paper records
- Antivirus, firewall and software update controls

Retention and Destruction

Personal information is retained only for as long as reasonably required. When no longer required:

- Paper records are securely shredded
- Electronic records are deleted or permanently de-identified

Incident and Breach Management

All suspected privacy incidents must be immediately escalated to the Privacy Officer and handled in accordance with the Data Breach Response Plan.

4. Personal Information Request for Access / Request for Correction

Dowling Property formally adopts the **REINSW-approved Personal Information Request for Access / Request for Correction Form.**

Purpose

This form provides a structured and compliant process for individuals to:

- Request access to personal (including sensitive) information held about them; and/or
- Request correction of personal information that is inaccurate, incomplete, misleading or out of date.

How Requests Are Managed

In accordance with APPs 12 and 13:

- All requests are managed by the Privacy Officer
- The identity of the requester must be verified before information is released or corrected
- Requests are logged and recorded
- Access requests are responded to within a reasonable timeframe (generally within 7 days)

Fees

- No fee is charged for correction requests
- A reasonable fee may apply for access requests, where permitted by law

Refusal of Access

Access may be refused where permitted under the Privacy Act, including where access would:

- Pose a serious threat to health or safety
- Unreasonably impact the privacy of others
- Be unlawful or prejudicial to legal proceedings

Where access is refused, written reasons will be provided.

5. Data Breach Response Plan (Internal)

Dowling Property maintains a Data Breach Response Plan aligned with the REINSW guidance and the OAIC Notifiable Data Breaches (NDB) Scheme.

What Is a Data Breach

A data breach occurs when personal information is:

- Lost
- Accessed without authorisation
- Disclosed without authorisation

Immediate Staff Obligations

All staff must:

1. Immediately notify senior management or the Privacy Officer
2. Preserve evidence
3. Take steps to contain the breach where safe to do so

Assessment Process

The Privacy Officer (or delegated response team) will:

- Assess whether the breach is an eligible data breach
- Determine likelihood of serious harm
- Complete an assessment within 30 days

Notification Requirements

If an eligible data breach is identified:

- Affected individuals will be notified as soon as practicable
- The Office of the Australian Information Commissioner (OAIC) will be notified

Notifications will include:

- Description of the breach
- Types of information involved
- Recommended steps individuals should take
- Actions taken by Dowling Property

Data Breach Register

All breaches (including near misses) are recorded in the internal **Data Breach Register** in accordance with REINSW guidance.

Review and Prevention

Following any breach, Dowling Property will:

- Review policies and procedures
- Update training where required
- Improve technical and organisational controls

Personal Information Request for Access / Request for Correction Form

Dowling Real Estate (Raymond Terrace) Pty Ltd

ABN: 29 101 237 281

Trading as: Dowling Property

Personal Information Request for Access / Request for Correction

This form may be used to request:

- access to personal (including sensitive) information we hold about you; and/or
- correction of personal information we hold about you that you believe is inaccurate, incomplete, out of date, irrelevant or misleading.

You are not required to use this form to make a request; however, it helps us process your request efficiently.

Your Details

Title: □ Mr □ Mrs □ Ms □ Other: _____

Surname (required): _____

Given name(s) (required): _____-_____

Date of birth (only if previously provided to us): ____ / ____ / _____

Current residential address (only if previously provided):

Suburb: _____ State: _____ Postcode: _____

Contact Details

Phone (required): _____

Email address (required): _____

Request for Access to Personal Information

□ I am requesting access to the personal (including sensitive) information held about me.

Please describe the information you are requesting (be as specific as possible):

Important: You may only request access to personal information that relates to you.

4. Request for Correction of Personal Information

□ I am requesting correction of personal (including sensitive) information held about me.

Information to be corrected:

Reason for correction (e.g. inaccurate, out of date, incomplete):

How should the information be corrected:

5. Fees

- No fee applies to correction requests.
- A reasonable fee may apply to access requests where permitted by law. If a fee applies, you will be notified before your request is processed.

6. Identity Verification

To protect your privacy, we must verify your identity before releasing or correcting personal information. We may contact you if additional verification is required.

7. Declaration

- I declare that:
- I am the individual to whom this request relates; and the information provided in this form is true and correct.

Signature: _____

Date: ____ / ____ / _____

8. Submitting This Form

Please submit this completed form to:

Kate Organ – Privacy Officer

Email: kate@dowlingterrace.com.au

Post: 16A William Street, Raymond Terrace NSW 2324

Office Use Only

Date received: _____

Identity verified: □ Yes □ No

Request type: □ Access □ Correction

Response due date: _____

Handled by: _____

Outcome: □ Approved □ Partially Approved □ Refused

Notes: