

# Privacy Policy

## Policy Statement

Vohland Real Estate has adopted this Policy to ensure that it collects, holds, uses, and discloses personal information, credit information, credit eligibility information, credit reporting information and CRB derived information in accordance with the APPs and Act.

Vohland Real Estate will maintain and regularly review this Policy and intends to comply with the APPs and the Act.

This Policy will be made available on the Vohland Real Estate website (but may be requested in other forms). You may also request a printed copy from our office, which will be provided free of charge and within a reasonable timeframe.

## Policy Objectives

It is the objective of this Privacy Policy to detail how Vohland Real Estate intends to abide by its obligations under the Act.

## Policy Scope

This policy applies to all of Vohland Real Estate.

## Definitions

**Access Seeker** has the same meaning as in the Act.

**Act** means the *Privacy Act 1988* (Cth).

**APPs** means Australian Privacy Principles.

**CRB derived information** has the same meaning as in the Act.

**Credit** has the same meaning as in the Act.

**Credit eligibility information** has the same meaning as in the Act.

**Credit information** has the same meaning as in the Act.

**Credit reporting information** has the same meaning as in the Act.

**Vohland Real Estate** means Vohland Rural Marketing Pty Ltd (ACN 106 668 393) trading as Vohland Real Estate

**Government related identifier** has the same meaning as in the Act.

**Personal information** has the same meaning as in the Act.

**Sensitive information** has the same meaning as in the Act.

**Service Provider** means any third party that Vohland Real Estate engage (or enter negotiations with a view to engaging) to provide services to support the Vohland Real Estate business.

# Policy

## PART 1 – CONSIDERATION OF INFORMATION PRIVACY

### Open and transparent management of information

Vohland Real Estate collects personal information which is reasonably necessary to:

- consider account and credit applications;
- maintain your account and contact details;
- process transactions to which you are a party;
- advertise, promote and provide you with products or services distributed by Vohland Real Estate; and/or
- improve website and web services.\*

*\*When you visit the Vohland Real Estate website, our Internet Service Provider records the following information: your IP address; the date, time, and duration of your visit; the number of pages you have downloaded; and the type of browser you use. Google analytics demographic and interest reporting may be used to develop specific offers or advertising from time to time.*

### Anonymity and pseudonymity

Vohland Real Estate will allow its customers to transact with it anonymously or by using a pseudonym, wherever that is reasonable and practicable.

However, this will not be possible if Vohland Real Estate is required or authorised by Australian law or other instrument (such as an order of a court or tribunal) to deal with customers who have been appropriately identified or where it is impracticable for Vohland Real Estate to deal with individuals who have not identified themselves or who would prefer to use a pseudonym. Examples of this impracticality include:

- when you transact using your Vohland Real Estate account;
- when you buy prescribed products and the law requires Vohland Real Estate to maintain a register of purchasers; and
- where you are contracting with a third party (for example, when you enter a contract to sell livestock or real estate).

## PART 2 – COLLECTION OF INFORMATION

### Collection of solicited information

Vohland Real Estate will only collect personal information and credit information from you if it is reasonably necessary to provide goods or services to you (including on credit) or undertake ancillary functions for you. Vohland Real Estate will only collect information for the purposes for which Vohland Real Estate advised you it was collecting it for, or a related purpose which would reasonably be expected, or otherwise with your permission. For example, Vohland Real Estate may from time to time use your personal information to provide information about products, services, promotions and campaigns which it expects may be of interest to you. Generally, Vohland Real Estate collect personal information through account opening/application forms, contracts to which you are a party, and other forms completed by you when dealing with Vohland Real Estate (including when participating in a promotion or competition). Vohland Real Estate will also collect credit information this way, and from your dealings with us. Vohland Real Estate may also collect credit eligibility information, credit reporting information and CRB derived information from credit reporting agencies (as detailed above).

Vohland Real Estate may also collect your information to do one or more of the following:

- assess an application for credit;
- open a credit account for you;
- maintain your account;
- process transactions on your behalf;
- notify you of any products or services distributed by Vohland Real Estate that may be of interest to you (including products or services offered by Joint Ventures and Service Partners);

- register any security interest Vohland Real Estate may have in connection with your credit account on the Personal Property Securities Register or another security register;
- enable Vohland Real Estate to meet its obligations under certain laws or pursuant to court documents (subpoenas or orders) that are served on Vohland Real Estate;
- any purpose for which the information was requested and any directly related purpose; or
- developing, improving and marketing our products and services.

Vohland Real Estate collects and uses your credit eligibility information, credit reporting information and CRB derived information for commercial credit related purposes only. Any disclosure (if any) will only occur by lawful means.

Vohland Real Estate will generally not be required to collect sensitive information about you. Vohland Real Estate will only do so if it is considered reasonably necessary for Vohland Real Estate to collect such information for Vohland Real Estate to perform its functions or activities and you consent, or another circumstance is provided for that enables that to occur (such as collection is required or authorised under an Australian law or by order of a court/tribunal).

Our website uses cookies to analyse website traffic and help provide a better visitor experience. A cookie is a text file containing small amounts of information which is downloaded to your device when you access a website. This information may include your internet protocol (IP) address, information and actions taken on the site including details about when you accessed the site. The text file is sent back to Vohland Real Estate's server each time your browser requests a page from the server. Information generated by cookies about the use of the website may be transferred to, and stored by, a web analytics service from a Service Provider to help improve online services. A Service Provider may be based overseas. You can configure your browser to reject cookies, but this may affect the functionality of the website.

If you install and use the Vohland Real Estate Weather App (App), then Vohland Real Estate will collect information about your device (e.g. model and operating system) and how you are using the App. Vohland Real Estate will also collect details of the location of your device when the App is running in the foreground (the App is open and on-screen) or background (the App is open but not on-screen) to update your weather forecasts as you move. You can enable or disable Vohland Real Estate's collection of your location data through your device settings.

#### **Dealing with unsolicited personal information**

If Vohland Real Estate receives personal information about you from a source other than you, or it is information provided by you which Vohland Real Estate did not request, Vohland Real Estate will determine, within a reasonable period, if it could have collected such personal information under APP 3. If Vohland Real Estate determine that it could have collected the information under APP 3, Vohland Real Estate may then use, and treat, that information as if it had collected the information in that manner. If Vohland Real Estate determines that it could not have collected the information under APP 3 and so long as it is lawful and reasonable to do so, it will destroy or de-identify that information as soon as practicable.

#### **Notification of the collection of information**

When Vohland Real Estate is collecting personal information and credit information about you, Vohland Real Estate will take reasonable steps to notify you, either at or before the time of, or as soon as reasonably practicable after, collection why Vohland Real Estate is collecting such information (which may have already been outlined in a contract with you). This is particularly relevant if Vohland Real Estate collect information about you from someone other than yourself. For example, Vohland Real Estate may receive personal information about you from a credit reporting agency.

Vohland Real Estate will also take steps that are reasonable in the circumstances to, among other things, make it clear to you if it is required to collect such information by reason of an Australian law or some other legal instrument (such as a court or tribunal order), why it is collecting such information and the potential consequences for you if such information is not collected.

## **PART 3 – DEALING WITH INFORMATION**

### **Use or disclosure of information**

Vohland Real Estate collects personal information from you for a specific reason as described in APP 3. This is referred to as the primary purpose. Vohland Real Estate will not use or disclose the collected information for a secondary purpose unless you consent to Vohland Real Estate doing so, or under the circumstances involved, Vohland Real Estate believe you would reasonably expect Vohland Real Estate to use or disclose the information for a secondary purpose related to the primary purpose.

In the event that Vohland Real Estate hold sensitive information about you, Vohland Real Estate will only use or disclose that information with your consent or if the use or disclosure is otherwise permitted under the APPs or the Act, such as where the use or disclosure is directly related to the primary purpose and within your reasonable expectations.

Vohland Real Estate may also disclose your personal information or sensitive information if it is required to do so by an Australian law, by order of a court or tribunal or if Vohland Real Estate reasonably believes that the use or disclosure of the information is reasonably necessary for an enforcement related activity, by or on behalf of an enforcement body, in which case Vohland Real Estate will make a written note of the use or disclosure. A disclosure may also be made where a permitted general situation or permitted health situation exists as provided for in the APPs.

Vohland Real Estate uses Service Providers to provide services to support Vohland Real Estate's business. These Service Providers may perform services or assist to provide services to you, by handling your personal information on Vohland Real Estate behalf or by using their own affiliates to provide these services. For example, Vohland Real Estate engages Service Providers to provide IT services, cloud storage, workforce management software services, vehicle fleet management services and website analytics services. Vohland Real Estate's Service Providers may need to access your personal information in connection with providing these services. The Service Providers may be based in Australia or in countries overseas, including in India, Canada and Ireland.

Vohland Real Estate only discloses your personal information to Service Providers in accordance with this Policy and the Act. Vohland Real Estate does not authorise use or disclosure of your personal information for any other purposes other than in connection to the provision of the services provided to us.

### **Direct marketing**

Vohland Real Estate will only use any personal information collected for the purpose of direct marketing where Vohland Real Estate:

- collected the information;
- believes you would reasonably expect Vohland Real Estate to use or disclose the information for direct marketing; and
- provide an option for you to request that Vohland Real Estate do not use the information for direct marketing – and you have not taken up this option.

If Vohland Real Estate collected the information involved from you and you would not reasonably expect Vohland Real Estate to use or disclose the information for the purpose of direct marketing, or collect the information from someone other than you, Vohland Real Estate will only use or disclose the information with your consent or where it is impracticable to obtain your consent. Either way, a simple means will be provided to you by which you may request not to receive direct marketing communications from Vohland Real Estate.

When Vohland Real Estate uses or discloses any personal information collected for direct marketing purposes, those materials will provide you with an option to declare you do not wish to receive such material in the future. If requested, Vohland Real Estate will provide you with the source of any information used or disclosed for direct marketing purposes, whether that direct marketing be by Vohland Real Estate or another organisation. Vohland Real Estate will also provide you with the opportunity to request that it, or the other organisation, does not send direct marketing information to you. Vohland Real Estate will not charge for that request and will action it in a reasonable time frame. You may also request that Vohland Real Estate not use or disclose information to facilitate direct marketing by other organisations.

### **Cross-border disclosure of information**

The Service Providers used to support the Vohland Real Estate business (including to handle personal information on Vohland Real Estate behalf where required or for complimentary software to support business functions) may be based in Australia or in countries overseas, including in India, Canada and Ireland. Where possible, Vohland Real Estate will take reasonable steps in the circumstances to ensure overseas recipients comply with the Act, or any corresponding law in the relevant jurisdiction, when handling information and have precautionary measures in place to protect your information from misuse, interference, loss and unauthorised access, modification or disclosure. This includes credit eligibility information received.

Vohland Real Estate will only transfer personal information about an individual to someone (other than a member of Vohland Real Estate or the individual) who is in a foreign country if Vohland Real Estate reasonably believe that the recipient of the information is subject to a law or binding scheme substantially similar to the way in which the APPs protect the information and there are mechanisms that can be used to take action or enforce those laws or binding scheme. Vohland Real Estate may also transfer personal information cross-border if you specifically consent to Vohland Real Estate doing so, or Vohland Real Estate are required to do so under Australian law or an order of a court or tribunal, a permitted general situation exists, or Vohland Real Estate are required or authorised by or under an international agreement relating to information sharing to do so. Otherwise, Vohland Real Estate

will take reasonable steps under the circumstances to ensure that the overseas recipient does not breach the APPs in relation to the information.

### **Adoption, use or disclosure of government related identifiers**

Generally, Vohland Real Estate does not use government related identifiers. Vohland Real Estate will not use or disclose a government related identifier unless the use or disclosure of the identifier is:

- reasonably necessary for Vohland Real Estate to be able to verify your identity for the purposes of Vohland Real Estate activities or functions; or
- reasonably necessary for Vohland Real Estate to fulfil any obligations it may have to a government agency or a State or Territory authority; or
- required or authorised by or under an Australian law or order of a court or tribunal; or
- where a permitted general situation exists in relation to the use or disclosure of the identifier.

Vohland Real Estate may use or disclose such an identifier if it is reasonably necessary for an enforcement related activity by, or on behalf of, an enforcement body. Vohland Real Estate may also use or disclose a government related identifier related to you if that is prescribed for by regulation.

## **PART 4 – INTEGRITY OF INFORMATION**

### **Quality of personal information**

Vohland Real Estate will take steps as are reasonable in the circumstances to ensure that the information it collects from you is accurate, up-to-date and complete. Where information is collected from you directly, Vohland Real Estate rely on you to supply accurate information and it may not consider that further steps are required. Vohland Real Estate will also ensure that steps as are reasonable in the circumstances to ensure that the information it collects, uses or discloses are, when considered in relation to the purpose for which Vohland Real Estate are using or disclosing the information, accurate, up-to-date, complete and relevant.

### **Security of information**

Vohland Real Estate will take all steps reasonable under the circumstances to protect your information from misuse, interference, loss and unauthorised access, modification or disclosure. If Vohland Real Estate no longer require the holding of information, it will take all reasonable steps under the circumstances to destroy or de-identify the information. However, Vohland Real Estate may retain documents that contain information in accordance with document retention practices and requirements under Australian law or any order of a court/tribunal. For example, Vohland Real Estate may retain copies of contracts to which you are a party, even though the contracts may contain personal information about you. Similarly, personal information provided for the purposes of establishing or varying the terms of a trading account will be retained on file for document retention purposes.

Vohland Real Estate, as a large Australian business, operates through several different entities and has relationships with various suppliers of goods, software and the like. This includes some Service Providers who may be offshore such as those providing cloud storage or IT servers. Vohland Real Estate will take reasonable steps with respect to information to ensure that any information collected, held, used and disclosed will comply with the Act and any corresponding law where information is collected, held, used or disclosed offshore.

## **PART 5 – ACCESS TO, AND CORRECTION OF, INFORMATION**

### **Access to information**

You can request access to the personal information that Vohland Real Estate holds about you by contacting the Vohland Real Estate Privacy Officer whose details are set out below. Vohland Real Estate may need to verify your identity to provide you with access and consider whether any exceptions to access apply.

In relation to requests to access information, Vohland Real Estate will generally provide you with access to your information on request, unless:

- giving access would be unlawful; or
- denying access is required or authorised by or under an Australian law or a court/tribunal order; or
- giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

Where Vohland Real Estate provides you with access to your personal information it will do so within a reasonable time after receiving your request and in the manner requested by you (if it is reasonable and practicable for Vohland Real Estate to do so). Vohland Real Estate may charge a reasonable fee for giving access to the information.

With credit eligibility information, access will be provided to you or an Access Seeker as required unless to do so would be unlawful, contrary to Australian law or a court/tribunal order or where giving access would likely prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body. Any request will be responded to within a reasonable period (usually within 30 days) after the request is made. A reasonable fee will be charged for access in these circumstances.

Vohland Real Estate may refuse an application for credit. If it does, and the refusal is based wholly or partly on credit eligibility information from a credit reporting body, Vohland Real Estate will provide you with a written notice within a reasonable period providing details for the refusal.

If Vohland Real Estate determines not to release information to you, it will provide you with written notice setting out the reasons for refusal and your review options.

#### **Correction of information**

If Vohland Real Estate determines that information held is inaccurate, out-of-date, incomplete, irrelevant or misleading, or you request Vohland Real Estate to correct the information (or any CRB derived information), it will take all such steps as are reasonable in the circumstances to correct the information held, after considering the reason why Vohland Real Estate hold the information, and to make sure it is accurate, up to date, complete, relevant and not misleading. If Vohland Real Estate had disclosed the original information to a third party or you request Vohland Real Estate to advise another party, Vohland Real Estate will take all reasonable steps to update that other party unless it is impracticable or unlawful to do so. Unless required not to by law or it is impracticable to do so, Vohland Real Estate will provide you with written notice within a reasonable period as to any correction made to information.

If Vohland Real Estate refuse to correct the information held, Vohland Real Estate will provide you with written notice as to the reasons for refusal, how you can complain about Vohland Real Estate refusal and any other matter Vohland Real Estate may be required to advise you about in the circumstances. If Vohland Real Estate have refused to correct information held, you may request Vohland Real Estate associate a statement from you, with the information held, that you believe that the information held is inaccurate, out-of-date, incomplete, irrelevant or misleading. If such circumstance arises, Vohland Real Estate will take all reasonable steps under the circumstances to associate any such statement.

If Vohland Real Estate receives a request from you to correct information held by us, Vohland Real Estate will respond to that request within a reasonable period after receiving the request. Vohland Real Estate will not charge for your request, the correction of information or associating a statement.

## **Privacy - Enquiries, Requests, Complaints, Breaches**

Enquiries regarding this Policy or the information Vohland Real Estate may hold on you, should be addressed to the Privacy Officer, whose contact details are below.

If you have any enquiries, requests, complaints or breaches to report about the collection, holding or management of your information, please contact the Privacy Officer via the contact details set out below so that Vohland Real Estate may attempt to resolve the issue with you quickly and directly.

#### **Privacy Officer**

Lynnell Vohland 0428 227 623