

Privacy Policy

This Privacy Policy governs the manner in which CROWN REAL ESTATE FAMILY OFFICE (referred to in this Privacy Policy as 'Crown', 'we', 'us' and 'our') (collects, uses, maintains, stores and discloses personal information, including personal information collected from users (each, a 'User') of the website <https://crownre.com.au/> ('Site'). This Privacy Policy applies to the Site and to all products and services offered by Crown.

This Privacy Policy has been developed in accordance with the Privacy Act 1988 (Cth) ('Privacy Act') and the European Union General Data Protection Regulation (Regulation 2016/679) ('GDPR').

The Schedule to this Privacy Policy provides additional protections of personal information of EU residents under the GDPR.

We are committed to respecting your privacy and protecting your personal information. Our staff are trained to protect your personal information in accordance with our policies, procedures and systems.

WHO DO WE COLLECT PERSONAL INFORMATION FROM?

We may collect your personal information from you or persons whom you have authorized to provide us with your personal information on your behalf when either you or your authorized representative gives us this information, for example, over the telephone, in person or via the Site. We may collect information about you when you interact with us through social media channels.

We may also collect personal information from Users of our Site in a variety of ways, including, but not limited to, when Users visit our Site, register on the Site, subscribe to the newsletter, apply for a job, and in connection with other activities, services, features or resources we make available on our Site. Users may be asked for, as appropriate, personal information including but not limited to Users' name, telephone number, email address and postal address. Users may, however, visit our Site anonymously. We will collect personal information from Users only if they voluntarily submit such information to us. Users can always refuse to supply personal information, except that it may prevent them from engaging in certain Site related activities.

UNSOLICITED PERSONAL INFORMATION

If we collect personal information about you that we did not ask for, we will check whether we could have collected that information ourselves. If we could have collected the information, we will handle it in the same way we handle other information we collect from you. If:

(A) We could not have collected the personal information; and

(B) The information is not contained in a Commonwealth record;

we will destroy the information or de-identify the information provided it is lawful and reasonable to do so.

When we receive personal information directly from you, we will take reasonable steps to notify you of the collection and the circumstances that surround the collection.

Sometimes:

(A) We collect your personal information from third parties as set out below under the heading 'What information do we collect?' **or**

(b) You may not be aware that we have collected your personal information.

If we collect information that can be used to identify you, we will take reasonable steps to notify you of the collection and the circumstances that surround the collection.

CONTACTING US

For the purpose of the General Data Protection Regulation ('GDPR'), the 'data controller' in respect of any personal data that you submit to us is **Bouwer Projects Pty Ltd** trading as **Crown Real Estate Family Office**, a company incorporated under Australian Law and whose registered office is at Suite 16, 23 Breene Place, Morningside, Qld, 4170, Australia.

If you want to know what information we hold about you or if you have any other queries in relation to this Privacy Policy, please contact our Privacy Officer using the following contact information:

CROWN REAL ESTATE FAMILY OFFICE

Privacy Officer - Elitha Bouwer

elitha@crownre.com.au

COMPLAINTS

If you have any complaints about data privacy, please contact our Privacy Officer at the contact details above.

If our Privacy Officer is unable to resolve the matter, we will escalate it as appropriate to facilitate resolution.

If you are not happy with the outcome of the Privacy Officer's investigation or if we have not replied to you within a reasonable time, then you can raise your concern with the Queensland Ombudsman or the Office of the Australian Information Commissioner ('OAIC').

WHAT INFORMATION DO WE COLLECT?

We will collect information that you provide to us when you are using any of our services or when you provide information through our Site. Such information may include, but may not be limited to:

- (a) your name, date of birth, debit/credit card information, telephone number, postal address, marital status, number of children (if any) and email address;
- (b) Information that you provide to us in e-mails or letters that you send to us;
- (c) Information from transactions you carry out through the Site;
- (d) Referee details;
- (e) Employment details;
- (f) Personal information to enable verification of your identify such as copies of photo identification (e.g. driver's license, passport, student ID, health care cards); and
- (g) Any other personal information relevant to the service we are providing you.

It is possible to view the Site without providing any personal details. However, without registering your details you may not be able to use all of our services

We may receive some information that you submit to a third party real estate website. Both Crown and the owner or operator of that third party website or application will be the data controller in respect of any such information and you should check the privacy policy of that third party website or application to find out how they will use your personal information.

We will only use any information that we collect from you in accordance with this Privacy Policy.

GOVERNMENT RELATED IDENTIFIERS

For the purposes of identification and verification, we may be required to collect government-related identifiers such as your tax file number, Medicare number, Centrelink reference number, driver's license number, passport number and individual healthcare identifiers.

We will not use or disclose this information unless the use or disclosure is permitted under the Privacy Act.

COOKIES

The Site uses cookies to ensure that you get the most out of the Site. Cookies are small amounts of information in the form of text files which we store on your computer. Cookies allow us to monitor usage of the Site, improve the Site's usability and to personalize the content for you.

If you do not wish us to install cookies on your computer for these purposes, you may change the settings on your internet browser to reject cookies. For more information about how to do this please consult the "Help" section of your browser. Please note that if you do set your browser to reject cookies, you may not be able to use all of the features of the Site. If you prevent us from placing cookies, you may not be able to use all of the functions of the Site. This is because we use cookies to enable you to log in to your account.

We may use Google Analytics, a website analysis service provided by Google LLC, for service usage analysis and reporting. The information collected includes how often users visit our Site, what links they click, the user's IP address, geo-location, browser and operating system and what other sites a user visited before coming to our Site. Analytics service providers generate statistical and other information about usage by means of cookies, which are stored on users' computers. The information generated relating to the Site may be used to create reports about the use of the Site and the analytics service provider will store this information. Using information provided by Google Analytics, we may segment individuals based on the pages they visited and use this information for advertising retargeting.

The personal information collected by Google Analytics is governed by Google Analytics' Terms of Service, which can be found at the following link:

<https://www.google.com/analytics/terms/us.html>

For EU residents, additional processing terms apply which can be found at the following link:

<https://privacy.google.com/businesses/processorterms/>

Further information about how Google Analytics collects and processes your personal information can be found at the following link:

<https://policies.google.com/technologies/partner-sites>

To opt out of Google Analytics' use of cookies, an add-on is available at the following link:

<https://tools.google.com/dlpage/gaoptout>

We may also use Facebook Pixel to measure the effectiveness of our advertising. The Facebook pixel is a piece of code which lets us measure, optimize and build audiences for our advertising campaigns. By using our Site or clicking our ads you consent to the processing of your personal information by Facebook in accordance with Facebook's terms and conditions which can be found at the following link:

<https://www.facebook.com/legal/terms/businessgoals>

To opt-out of collection and use of your information for ad targeting, a browser tool is available at the following link: **<http://www.aboutads.info/choices>**.

In addition, advertisers whose advertisements appear on our Site may use and place cookies on your computer and we have no control over this. Please consult the terms and conditions and privacy policy of such third party advertisers to find out how they collect and use your personal data and to establish

whether they use cookies and what they may use them for. If you are uncomfortable with the use of cookies, you can manage or control them by changing your settings in your internet browser.

HOW DO WE USE AND PROCESS THE INFORMATION THAT YOU PROVIDE TO US?

We will use and process your personal information for the purposes for which it was collected and in the following ways:

- To ensure that our services are delivered in the most effective manner for you and your computer;
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
- To carry out our obligations arising from any contracts entered into between you and us;
- To provide customer service to you in relation to your use of our services, to deal with enquiries and complaints relating to the use of our services and to notify you about any changes to our services;
- To administer, support, improve, optimize and develop our services;
- To produce reports which may be used, sold or published by us at our sole discretion provided that any data or reports will be anonymous and not refer to any individual user of the services;
- For internal marketing and demographic studies to improve the products and services that we provide;
- For security purposes;
- To conduct functions and activities as a real estate business;
- To enable you to access features of our Site which require a user account, such as creating and interacting with content;
- To allow us to communicate with you;
- To manage your account with us;
- To manage any service we provide;
- To notify you of changes to our services;
- To provide you with a better experience and to improve the quality of our services;
- For other purposes with your consent; and as required by law.

We may also use your information to provide you with our email notifications, newsletters and other marketing communications that either you request from us or which you consent to by opting in when completing a registration form on the Site. You may opt out from receiving such marketing communications from us at any time by notifying us in writing, contacting us at elitha@crownre.com.au or, alternatively, by following the procedure to 'unsubscribe' that is specified in the email that you receive.

DISCLOSURE OF YOUR INFORMATION

Other than as expressly set out in this Privacy Policy or as otherwise required or permitted by law, we will not share, sell or distribute any of the information you provide to us without your consent. You should note that information posted on the public elements of the Site may be visible by users of the Site throughout the world. You should therefore be careful when submitting information about yourself to the Site.

DISCLOSURE TO THIRD PARTIES

Sometimes we may disclose personal information about you to third parties. Examples of third parties that we may disclose your personal information to include, but are not limited to:

Those parties listed below under the heading 'Overseas recipients';

Electronic cloud data storage providers such as My Desktop, Property Tree, Inspect Real Estate, Inspection Manager and REST all currently located in Australia;
Third party advertisers such as domain.com.au and realestate.com.au who may contact you regarding the marketing of your property; and
Any other person where you have given your consent.

We may also disclose your personal information to third parties where we are required to do so by law or court order.

Overseas recipients:

We are based in Australia and your personal information will be transmitted to our offices within Australia.

In some circumstances we may need to disclose your personal information to overseas recipients including:

Google LLC and its affiliates located in the United States of America, through our use of Google Analytics;
Facebook Inc located in the United States of America through our use of Facebook Pixel;
News Corporation Inc located in the United States of America for advertising purposes; and
The Rocket Science Group, LLC (Mailchimp) located in the United States of America for marketing purposes.

Where your personal information is disclosed to an overseas recipient we will:

Take reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles in the Privacy Act, unless an exception in the Privacy Act applies; and seek to ensure that information is used, held and disclosed consistently with the Privacy Act and any other applicable laws.

THIRD PARTY SITES

The Site may contain links to websites or access to applications that are operated by third parties. We do not control and accept no liability or responsibility for those websites and this Privacy Policy does not apply to those websites. Please consult the terms and conditions and privacy policy of those third party websites to find out how they collect and use your personal data and to establish whether they use cookies and what they may use them for.

Advertisements contained on our Site operate as links to the advertiser's website and as such any information they collect by virtue of your clicking on that link will be collected and used by the relevant advertiser in accordance with the privacy policy of that advertiser.

HOW DO WE PROTECT YOUR INFORMATION?

We are committed to keeping your personal information secure.

We store your personal information in different ways, including in paper and electronic form and via a cloud service provider as set out above under the heading 'Disclosure to third parties'.

Appropriate and reasonable security measures will be adopted to protect your information from access by unauthorized persons and against unlawful processing, accidental loss, destruction and damage. However, you acknowledge that data transmission over the internet is inherently unsecure and that we cannot guarantee the security of data you send over the internet.

Some of the ways we keep your personal information secure is by:

- (a) Continuing to develop and monitor security measures in order to decrease the risk of unauthorized access to personal information;
- (b) Continuing to engage information systems support to maintain computer and network security, including access control for authorized users, data integrity checks, network intrusion systems, host intrusion detection systems and expert monitoring;
- (c) Providing a discrete environment for confidential discussions;
- (d) Protecting file servers by access privileges and permissions;
- (e) Having electronic website security systems in place, including the use of secure hypertext transfer protocol, network intrusion protection and segregated virtual private networks; and
- (f) Defining and controlling user access to ensure that access to personal information is only granted where the individual seeking access is authorized to do so.

Your personal information will only be held in hard copy for a reasonable period or as long as the law requires or permits. Usually, we retain your personal information in hard copy form for up to 7 years. After this time, your personal information is securely and electronically archived and any information that is no longer required for ongoing provision of products or services is deleted.

ACCESSING YOUR INFORMATION

We will take reasonable steps to ensure that any personal information we collect, use or disclose is accurate, complete, up-to-date and relevant to our functions or activities.

You may at any time request access to and/or, if incorrect, rectification of your personal information by contacting us at the address set out in above under the heading 'Contacting us' or by e-mailing elitha@crownre.com.au. We reserve the right to ask you for proof of your identity and to charge you a reasonable fee to meet our costs in granting any data access request you make.

CHANGES TO OUR PRIVACY POLICY

We have the discretion to update this Privacy Policy at any time. When we do, we will revise the updated date at the bottom of this page. We encourage Users and clients to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this Privacy Policy periodically and become aware of modifications.

SCHEDULE – SPECIFIC PROVISIONS REGARDING EU RESIDENTS

EU residents – grounds for processing personal information

For EU residents, processing of your personal information will be on the basis of the following grounds:

Where necessary to provide you with our products or services – please see the above paragraph entitled 'How do we use and process the information that you provide to us';

Where it is in our legitimate interests to do so, such as:

To monitor your compliance with our terms and conditions;

To prevent fraud;

To analyze data for trends and statistics;

To improve service delivery to you;

To comply with any applicable laws, regulations or codes of practice; and

To verify your identity with your consent, such as:

For the use of cookies for analytical purposes; and

For marketing communications,

Noting, you have the right to withdraw your consent at any time by contacting us at the contact details set out above in this Policy;

Where necessary under a legal obligation in the EU; we may process your personal information where we are obliged to do so under EU law; and

Where necessary in relation to legal claims: We may process certain categories of your personal information where this is necessary for the establishment, exercise or defense of legal claims.

EU RESIDENTS - DISCLOSURE

If you are an EU resident, we will only transfer personal information outside the EU to recipients offering an adequate level of data protection. In these situations, and as required, we will enter into contractual arrangements with these recipients to ensure that your personal information is protected in line with European law.

Should you wish to see a copy of such agreements, please email us at the contact details set out above in this Privacy Policy?

EU RESIDENTS – ADDITIONAL RIGHTS

If you are an EU resident, you may have certain additional EU rights in relation to your personal information which we hold.

Some of these rights may only be exercised in certain circumstances and there are a number of exceptions, but broadly, these rights include:

THE RIGHT OF ACCESS

You have the right to know whether we are processing your personal information and if so, to access the personal information held and certain information about how it is used and who it is shared with.

We may charge a reasonable administration fee if more than one copy is required.

We may not provide you with a copy where to do so would interfere with the rights or freedoms of others.

THE RIGHT TO CORRECTION

You have the right to have your personal information corrected where it is inaccurate and to have incomplete personal information completed.

You may also exercise your right to restrict processing of your personal information while we assess if the personal information held about you is inaccurate or incomplete.

THE RIGHT TO BE FORGOTTEN

You have the right to request that we erase your personal information in the following circumstances:

You believe that we no longer need to hold the personal information;

We are processing your personal information on the basis of your consent and you withdraw your consent (and there is no other ground under which we can process your personal information);

You no longer wish for your personal information to be used to send you marketing material;

You otherwise object to the processing (and there are no overriding legitimate reasons for processing);
or

You believe your personal information has been unlawfully processed by us.

You may exercise your right to restrict processing of your personal information while we consider your request.

THE RIGHT TO RESTRICT PROCESSING

You have the right to stop us from processing your personal information in the following circumstances:

You believe the personal information held about you is inaccurate or incomplete (during the period it takes us to verify this);

We wish to erase your personal information because the processing is unlawful, but you require it to be stored instead;

we wish to erase your personal information because it is no longer necessary, but you require it to be stored instead for the establishment, exercise or defense of legal claims; or

You have objected to processing of your personal information and you wish for us to stop processing your personal information during the period of time while we establish if there are any overriding interests in retaining your personal information.

THE RIGHT TO DATA PORTABILITY

You have the right to receive your personal information which you have provided to us in a structured, commonly used and machine-readable format and you have the right to send this to another party.

Please note that this right will only apply to personal information processed with your consent, for the purposes of performing the contract with you or if the processing is carried out by automated means.

THE RIGHT TO OBJECT

You have the right to object to the processing of your personal information for the purposes of sending you marketing material including where we build profiles about you for this purpose.

You may also object to us processing on the basis of our legitimate interest. Where this is the case, please provide as much detail as possible with your request so that we can consider if there is any overriding interest in continuing to process such information.

You may exercise your right to restrict the processing of your personal information while we assess if there is any overriding interest in continuing to process your personal information.