



## **Privacy Policy**

**First National Group of Independent  
Real Estate Agents Limited**  
ACN 005 942 192

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## Privacy Statement

The *Privacy Act 1988* requires entities bound by the Australian Privacy Principles to have a privacy policy. This privacy policy outlines the personal information handling practices of First National Real Estate Neilson Partners ACN 053 469 819 ("First National", "us" or "we"). This policy is written in simple language.

The specific legal obligations of First National when collecting and handling your personal information are outlined in the *Privacy Act 1988* and in particular in the Australian Privacy Principles found in that Act.

We respect the privacy of your personal information and treat it in accordance with this statement. If you have any concerns or would like to access your personal information that we hold, please contact:

First National Real Estate Neilson Partners  
1/418 Princes Highway, Narre Warren  
03 9705 4888  
narrewarren@neilsonpartners.com.au

## Overview

We collect, hold, use and disclose personal information to carry out business functions or activities. These functions and activities include:

- promoting and marketing the First National network;
- promoting and marketing First National Members;
- providing information to vendors, purchasers and the public on real estate and related areas;
- advertising properties listed with First National Members;
- establishing training programs, seminars and conferences for First National Members; and
- undertaking activities in support of our functions and activities including human resources, corporate administration, property management and public relations activities.

## Collection of your personal information

When we refer to personal information we mean information from which your identity is reasonably apparent. This information may include information or an opinion about you. The personal information we hold about you may also include credit information. At all times we try to only collect the information we need for the particular function or activity we are carrying out.

Each time you contact us, you may provide us with personal information about yourself or others that we need to use to provide you with our services. The main way we collect personal information about you is when you give it to us, for example when you:

- complete forms, applications or surveys;
- contact us to ask for information;
- participate in forums on our website; or
- otherwise specifically provide us with your personal information.

We will only use or disclose your personal information for the primary purpose of our business or purposes related to our business activities. The primary purpose of our business includes, but is not limited to:

- marketing real estate goods or services;
- marketing First National Members;
- marketing the First National Network; and
- providing further information about our services.

You may provide personal information to us to receive information about products or services offered through this website, to purchase such products and services, to receive newsletters or become involved in promotions or other initiatives commenced by us. This personal information may include details such as

your name, age, gender, contact information, products and services you are interested in or require more information about. If you purchase or request products and services from us we may also request your preferences for receiving further marketing or promotional material.

We require some of this information to provide services to you, as indicated by mandatory fields on some forms. For non-mandatory fields, the choice of how much information you provide to us is yours. We seek this information to process your request for information and provide that information to you, to improve the quality of our products and services and to assist you to determine which products and services best meet your needs.

### **Collecting through our websites**

We may also collect and store information about your visit to this website, including:

- the name of the domain from which you accessed the internet;
- the date and time you accessed the website;
- the internet address of the website from which you linked directly to the website; and
- the pages you accessed while visiting the website

This information does not in itself identify individuals and is used to measure the number of visitors to the website and how it was navigated. This information assists us to make the website more useful to you.

We also collect information from subscribers (persons registering their details with us through the website) or website visitors for the purpose of improving our quality and effectiveness and to provide you with information. We welcome feedback from you about all aspects of this website. We store feedback that users send to us. This feedback is used to administer and refine our service. We may also use the information to improve or promote this site. We will not publish your name in connection with any information you provide without your permission.

If you do not provide us with your personal information, some enhanced services, like the right to access our property guides, will be unavailable to you. If you do provide us with your personal information, we will protect it in accordance with the Australian Privacy Principles.

### **Social Networking Services**

We may use social networking services such as Twitter, Facebook, Instagram and YouTube to communicate with the public. When you communicate with us using these services we may collect your personal information, but we only use it to help us to communicate with you and the public. The social networking service will also handle your personal information for its own purposes. These sites have their own privacy policies.

### **Notification of collection of personal information**

If we collect personal information from someone or some entity other than you in order to provide a property related service, such as acquiring information from a tenancy database, we will make you aware that we have done so and explain why. We will also explain if there are any consequences for you if such information is not collected. Organisations that we are likely to collect personal information from or provide information to are:

- TICA;
- Barclays MIS;
- Veda; and
- NTD (National Tenancy Database).

### **How we use your personal information**

We may use your personal information to deliver services you have requested (for example, responding to an inquiry for information concerning a property).

We may also use your personal information to send you periodic mailings containing information on new services and upcoming events that may interest you. If at any stage you decide that you do not wish to receive such material, please let us know by following the Opt-Out procedure below and we will ensure that your name is removed from our contact list.

### **Business without identifying you**

In some circumstances it will be necessary for First National Real Estate or its members to identify you in order to successfully do business with you, however, where it is lawful and practicable to do so, we will offer you the opportunity of doing business with us without providing us with personal information, for example, if you make general inquiries about real estate, the market, or ask a question via our National Website.

### **Direct marketing**

From time to time we may use your personal information to provide you with current information about real estate, offers you may find of interest, changes to our organisation, or new products or services being offered by us or any company with whom we are associated.

If you do not wish to receive marketing information, you may at any time decline to receive such information by telephoning us on 03 9705 4888 or by emailing us at [narrewarren@neilsonpartners.com.au](mailto:narrewarren@neilsonpartners.com.au).

If the direct marketing is by email you may also use the unsubscribe function. We will not charge you for giving effect to your request and will take all reasonable steps to meet your request at the earliest possible opportunity.

### **Disclosure**

We will only disclose your personal information to carry out business activities and functions as identified above.

### **First National Members**

In order to deliver our services to you, we disclose your personal information to the relevant independently owned and operated First National member or business partner who is best positioned to assist with your particular request. In doing so, we authorise these members to use your personal information in the ways described above. These members will handle your personal information in accordance with the Privacy Statements accessible through their websites.

Other than as stated in this Statement, we do not rent, sell or otherwise disclose your personal information to non-member companies or organisations without your prior consent.

### **Overseas Recipients**

We may disclose your personal information to overseas recipients such as international First National Real Estate member offices, should this be deemed necessary (for example, responding to an inquiry for information concerning a property). Countries could include:

- New Zealand;
- Vanuatu;
- Papua New Guinea; and
- Any other country where a First National member is based.

Information that you post in any social media public forum used by First National Real Estate or its members (such as but not limited to Facebook, Twitter or Instagram) may be exposed to overseas recipients.

Prior to disclosing any of your personal information to another person or organisation, we will take all reasonable steps to satisfy ourselves that:

- (1) the person or organisation has a commitment to protecting your personal information at least equal to our commitment, or
- (2) you have consented to us making the disclosure.

We may use cloud storage to store the personal information we hold about you. The cloud storage and the IT servers may be located outside Australia.

We may disclose your personal information to overseas entities that provide support functions to us. You may obtain more information about these entities by contacting us.

## **Opt-Out procedure**

In each direct marketing or promotional communication with you, we will advise you how to notify us if you do not wish to receive any further communications from us. If our correspondence is in the form of an e-mail, we will attach simple instructions on how you can unsubscribe from our mailing list. In any event you can opt-out from receiving marketing or promotional material from us by emailing us at [insert] or by contacting us by mail or telephone and asking to be removed from our mailing list.

You should note that by opting out of our mailing list, you will not automatically be removed from the mailing lists of other First National members or business partners to whom we have forwarded your personal information because we do not have control over those mailing lists.

If you no longer wish to receive material from the relevant First National member or business partner to whom we have forwarded your personal information, please follow their own Opt-Out procedure as described on their website or in their marketing material.

## **Access to your personal information**

You can find out what personal information we have about you, and amend or update your personal information, by e-mailing us at [narrewarren@neilsonpartners.com.au](mailto:narrewarren@neilsonpartners.com.au) or by telephoning us (contact details are provided at the beginning of this Statement).

We may charge a fee for our actual costs of retrieving and supplying the information to you, including staff costs in locating and retrieving the personal information, staff costs in reproducing and send the personal information, costs of postage etc.

Depending on the type of request that you make we may respond to your request immediately, otherwise we usually respond to you within seven days of receiving your request. We may need to contact other entities to properly investigate your request.

There may be situations where we are not required to provide you with access to your personal information, for example, if the information relates to existing or anticipated legal proceedings, or if your request is vexatious.

An explanation will be provided to you if we deny you access to the personal information we hold about you.

If any of the personal information we hold about you is incorrect, inaccurate or out of date you may request that we correct the information. If appropriate we will correct the personal information. At the time of the request, otherwise, we will provide an initial response to you within seven days of receiving your request. Where reasonable, and after our investigation, we will provide you with details about whether we have corrected the personal information within 30 days.

We may need to consult with other entities as part of our investigation.

## **Complaints**

Should you wish to make a complaint about management of your information, please email [narrewarren@neilsonpartners.com.au](mailto:narrewarren@neilsonpartners.com.au) or phone 03 9705 4888. First National Real Estate Neilson Partners will make a record of your complaint, verify the information received, and take steps to correct any deviation

from Australian Privacy Principles.

Should your complaint relate specifically to the management of your personal information by another independent member of the First National Real Estate network (i.e. Not First National Real Estate's corporate administration or us), the network will refer your complaint directly to the member for response.

We will acknowledge your complaint within seven days. We will provide you with a decision on your complaint within 30 days.

If you are dissatisfied with the response of our complaints officer you may make a complaint to the Privacy Commissioner which can be contacted on either [www.oaic.gov.au](http://www.oaic.gov.au) or 1300 363 992.

## **Sensitive information**

We will only collect sensitive information about you with your consent. Sensitive information is personal information that includes information relating to your racial or ethnic origin, political persuasion, memberships in trade or professional associations or trade unions, sexual preferences, criminal record, or health.

## **Unsolicited information**

If we receive unsolicited private information from you, we will as soon as practicable, but only if lawful, destroy the information or assure it is de-identified.

## **Security**

We use all reasonable efforts to keep your personal information secure, accurate and up-to-date. Your personal information is stored behind firewalls and personal information is accessible only by password access.

You can assist us to keep your personal information secure by ensuring that any username or password provided to you is kept confidential.

## **Disclaimer of responsibility for third party sites**

Our website contains links to other web sites including the websites of First National members. We are not responsible for the content on those other websites or their privacy practices.

## **How we may change this statement**

We reserve the right to amend or update this Statement so long as no change or amendment has a retrospective detrimental affect to your privacy rights.

This privacy policy came into existence 11 March 2014.



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The specific legal obligations of First National when collecting and handling your personal information are outlined in the *Privacy Act 1988* and in particular in the Australian Privacy Principles found in that Act.

We respect the privacy of your personal information and treat it in accordance with this statement. If you have any concerns or would like to access your personal information that we hold, please contact:

First National Real Estate Neilson Partners  
57 High Street, Berwick  
03 9707 6000  
berwick@neilsonpartners.com.au

## Overview

We collect, hold, use and disclose personal information to carry out business functions or activities. These functions and activities include:

- promoting and marketing the First National network;
- promoting and marketing First National Members;
- providing information to vendors, purchasers and the public on real estate and related areas;
- advertising properties listed with First National Members;
- establishing training programs, seminars and conferences for First National Members; and
- undertaking activities in support of our functions and activities including human resources, corporate administration, property management and public relations activities.

## Collection of your personal information

When we refer to personal information we mean information from which your identity is reasonably apparent. This information may include information or an opinion about you. The personal information we hold about you may also include credit information. At all times we try to only collect the information we need for the particular function or activity we are carrying out.

Each time you contact us, you may provide us with personal information about yourself or others that we need to use to provide you with our services. The main way we collect personal information about you is when you give it to us, for example when you:

- complete forms, applications or surveys;
- contact us to ask for information;
- participate in forums on our website; or
- otherwise specifically provide us with your personal information.

We will only use or disclose your personal information for the primary purpose of our business or purposes related to our business activities. The primary purpose of our business includes, but is not limited to:

- marketing real estate goods or services;
- marketing First National Members;
- marketing the First National Network; and
- providing further information about our services.

You may provide personal information to us to receive information about products or services offered through this website, to purchase such products and services, to receive newsletters or become involved in promotions or other initiatives commenced by us. This personal information may include details such as

your name, age, gender, contact information, products and services you are interested in or require more information about. If you purchase or request products and services from us we may also request your preferences for receiving further marketing or promotional material.

We require some of this information to provide services to you, as indicated by mandatory fields on some forms. For non-mandatory fields, the choice of how much information you provide to us is yours. We seek this information to process your request for information and provide that information to you, to improve the quality of our products and services and to assist you to determine which products and services best meet your needs.

### **Collecting through our websites**

We may also collect and store information about your visit to this website, including:

- the name of the domain from which you accessed the internet;
- the date and time you accessed the website;
- the internet address of the website from which you linked directly to the website; and
- the pages you accessed while visiting the website

This information does not in itself identify individuals and is used to measure the number of visitors to the website and how it was navigated. This information assists us to make the website more useful to you.

We also collect information from subscribers (persons registering their details with us through the website) or website visitors for the purpose of improving our quality and effectiveness and to provide you with information. We welcome feedback from you about all aspects of this website. We store feedback that users send to us. This feedback is used to administer and refine our service. We may also use the information to improve or promote this site. We will not publish your name in connection with any information you provide without your permission.

If you do not provide us with your personal information, some enhanced services, like the right to access our property guides, will be unavailable to you. If you do provide us with your personal information, we will protect it in accordance with the Australian Privacy Principles.

### **Social Networking Services**

We may use social networking services such as Twitter, Facebook, Instagram and YouTube to communicate with the public. When you communicate with us using these services we may collect your personal information, but we only use it to help us to communicate with you and the public. The social networking service will also handle your personal information for its own purposes. These sites have their own privacy policies.

### **Notification of collection of personal information**

If we collect personal information from someone or some entity other than you in order to provide a property related service, such as acquiring information from a tenancy database, we will make you aware that we have done so and explain why. We will also explain if there are any consequences for you if such information is not collected. Organisations that we are likely to collect personal information from or provide information to are:

- TICA;
- Barclays MIS;
- Veda; and
- NTD (National Tenancy Database).

### **How we use your personal information**

We may use your personal information to deliver services you have requested (for example, responding to an inquiry for information concerning a property).

We may also use your personal information to send you periodic mailings containing information on new services and upcoming events that may interest you. If at any stage you decide that you do not wish to receive such material, please let us know by following the Opt-Out procedure below and we will ensure that your name is removed from our contact list.

### **Business without identifying you**

In some circumstances it will be necessary for First National Real Estate or its members to identify you in order to successfully do business with you, however, where it is lawful and practicable to do so, we will offer you the opportunity of doing business with us without providing us with personal information, for example, if you make general inquiries about real estate, the market, or ask a question via our National Website.

### **Direct marketing**

From time to time we may use your personal information to provide you with current information about real estate, offers you may find of interest, changes to our organisation, or new products or services being offered by us or any company with whom we are associated.

If you do not wish to receive marketing information, you may at any time decline to receive such information by telephoning us on 03 9707 6000 or by emailing us at [berwick@neilsonpartners.com.au](mailto:berwick@neilsonpartners.com.au).

If the direct marketing is by email you may also use the unsubscribe function. We will not charge you for giving effect to your request and will take all reasonable steps to meet your request at the earliest possible opportunity.

### **Disclosure**

We will only disclose your personal information to carry out business activities and functions as identified above.

### **First National Members**

In order to deliver our services to you, we disclose your personal information to the relevant independently owned and operated First National member or business partner who is best positioned to assist with your particular request. In doing so, we authorise these members to use your personal information in the ways described above. These members will handle your personal information in accordance with the Privacy Statements accessible through their websites.

Other than as stated in this Statement, we do not rent, sell or otherwise disclose your personal information to non-member companies or organisations without your prior consent.

### **Overseas Recipients**

We may disclose your personal information to overseas recipients such as international First National Real Estate member offices, should this be deemed necessary (for example, responding to an inquiry for information concerning a property). Countries could include:

- New Zealand;
- Vanuatu;
- Papua New Guinea; and
- Any other country where a First National member is based.

Information that you post in any social media public forum used by First National Real Estate or its members (such as but not limited to Facebook, Twitter or Instagram) may be exposed to overseas recipients.

Prior to disclosing any of your personal information to another person or organisation, we will take all reasonable steps to satisfy ourselves that:

- (1) the person or organisation has a commitment to protecting your personal information at least equal to our commitment, or
- (2) you have consented to us making the disclosure.

We may use cloud storage to store the personal information we hold about you. The cloud storage and the IT servers may be located outside Australia.

We may disclose your personal information to overseas entities that provide support functions to us. You may obtain more information about these entities by contacting us.

## **Opt-Out procedure**

In each direct marketing or promotional communication with you, we will advise you how to notify us if you do not wish to receive any further communications from us. If our correspondence is in the form of an e-mail, we will attach simple instructions on how you can unsubscribe from our mailing list. In any event you can opt-out from receiving marketing or promotional material from us by emailing us at [insert] or by contacting us by mail or telephone and asking to be removed from our mailing list.

You should note that by opting out of our mailing list, you will not automatically be removed from the mailing lists of other First National members or business partners to whom we have forwarded your personal information because we do not have control over those mailing lists.

If you no longer wish to receive material from the relevant First National member or business partner to whom we have forwarded your personal information, please follow their own Opt-Out procedure as described on their website or in their marketing material.

## **Access to your personal information**

You can find out what personal information we have about you, and amend or update your personal information, by e-mailing us at [berwick@neilsonpartners.com.au](mailto:berwick@neilsonpartners.com.au) or by telephoning us (contact details are provided at the beginning of this Statement).

We may charge a fee for our actual costs of retrieving and supplying the information to you, including staff costs in locating and retrieving the personal information, staff costs in reproducing and send the personal information, costs of postage etc.

Depending on the type of request that you make we may respond to your request immediately, otherwise we usually respond to you within seven days of receiving your request. We may need to contact other entities to properly investigate your request.

There may be situations where we are not required to provide you with access to your personal information, for example, if the information relates to existing or anticipated legal proceedings, or if your request is vexatious.

An explanation will be provided to you if we deny you access to the personal information we hold about you.

If any of the personal information we hold about you is incorrect, inaccurate or out of date you may request that we correct the information. If appropriate we will correct the personal information. At the time of the request, otherwise, we will provide an initial response to you within seven days of receiving your request. Where reasonable, and after our investigation, we will provide you with details about whether we have corrected the personal information within 30 days.

We may need to consult with other entities as part of our investigation.

## **Complaints**

Should you wish to make a complaint about management of your information, please email [berwick@neilsonpartners.com.au](mailto:berwick@neilsonpartners.com.au) or phone 03 9707 6000. First National Real Estate Neilson Partners will make a record of your complaint, verify the information received, and take steps to correct any deviation

from Australian Privacy Principles.

Should your complaint relate specifically to the management of your personal information by another independent member of the First National Real Estate network (i.e. Not First National Real Estate's corporate administration or us), the network will refer your complaint directly to the member for response.

We will acknowledge your complaint within seven days. We will provide you with a decision on your complaint within 30 days.

If you are dissatisfied with the response of our complaints officer you may make a complaint to the Privacy Commissioner which can be contacted on either [www.oaic.gov.au](http://www.oaic.gov.au) or 1300 363 992.

## **Sensitive information**

We will only collect sensitive information about you with your consent. Sensitive information is personal information that includes information relating to your racial or ethnic origin, political persuasion, memberships in trade or professional associations or trade unions, sexual preferences, criminal record, or health.

## **Unsolicited information**

If we receive unsolicited private information from you, we will as soon as practicable, but only if lawful, destroy the information or assure it is de-identified.

## **Security**

We use all reasonable efforts to keep your personal information secure, accurate and up-to-date. Your personal information is stored behind firewalls and personal information is accessible only by password access.

You can assist us to keep your personal information secure by ensuring that any username or password provided to you is kept confidential.

## **Disclaimer of responsibility for third party sites**

Our website contains links to other web sites including the websites of First National members. We are not responsible for the content on those other websites or their privacy practices.

## **How we may change this statement**

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First National Real Estate Neilson Partners  
130 Main Street, Pakenham  
03 5941 4444  
pakenham@neilsonpartners.com.au

## Overview

We collect, hold, use and disclose personal information to carry out business functions or activities. These functions and activities include:

- promoting and marketing the First National network;
- promoting and marketing First National Members;
- providing information to vendors, purchasers and the public on real estate and related areas;
- advertising properties listed with First National Members;
- establishing training programs, seminars and conferences for First National Members; and
- undertaking activities in support of our functions and activities including human resources, corporate administration, property management and public relations activities.

## Collection of your personal information

When we refer to personal information we mean information from which your identity is reasonably apparent. This information may include information or an opinion about you. The personal information we hold about you may also include credit information. At all times we try to only collect the information we need for the particular function or activity we are carrying out.

Each time you contact us, you may provide us with personal information about yourself or others that we need to use to provide you with our services. The main way we collect personal information about you is when you give it to us, for example when you:

- complete forms, applications or surveys;
- contact us to ask for information;
- participate in forums on our website; or
- otherwise specifically provide us with your personal information.

We will only use or disclose your personal information for the primary purpose of our business or purposes related to our business activities. The primary purpose of our business includes, but is not limited to:

- marketing real estate goods or services;
- marketing First National Members;
- marketing the First National Network; and
- providing further information about our services.

You may provide personal information to us to receive information about products or services offered through this website, to purchase such products and services, to receive newsletters or become involved in promotions or other initiatives commenced by us. This personal information may include details such as

your name, age, gender, contact information, products and services you are interested in or require more information about. If you purchase or request products and services from us we may also request your preferences for receiving further marketing or promotional material.

We require some of this information to provide services to you, as indicated by mandatory fields on some forms. For non-mandatory fields, the choice of how much information you provide to us is yours. We seek this information to process your request for information and provide that information to you, to improve the quality of our products and services and to assist you to determine which products and services best meet your needs.

### **Collecting through our websites**

We may also collect and store information about your visit to this website, including:

- the name of the domain from which you accessed the internet;
- the date and time you accessed the website;
- the internet address of the website from which you linked directly to the website; and
- the pages you accessed while visiting the website

This information does not in itself identify individuals and is used to measure the number of visitors to the website and how it was navigated. This information assists us to make the website more useful to you.

We also collect information from subscribers (persons registering their details with us through the website) or website visitors for the purpose of improving our quality and effectiveness and to provide you with information. We welcome feedback from you about all aspects of this website. We store feedback that users send to us. This feedback is used to administer and refine our service. We may also use the information to improve or promote this site. We will not publish your name in connection with any information you provide without your permission.

If you do not provide us with your personal information, some enhanced services, like the right to access our property guides, will be unavailable to you. If you do provide us with your personal information, we will protect it in accordance with the Australian Privacy Principles.

### **Social Networking Services**

We may use social networking services such as Twitter, Facebook, Instagram and YouTube to communicate with the public. When you communicate with us using these services we may collect your personal information, but we only use it to help us to communicate with you and the public. The social networking service will also handle your personal information for its own purposes. These sites have their own privacy policies.

### **Notification of collection of personal information**

If we collect personal information from someone or some entity other than you in order to provide a property related service, such as acquiring information from a tenancy database, we will make you aware that we have done so and explain why. We will also explain if there are any consequences for you if such information is not collected. Organisations that we are likely to collect personal information from or provide information to are:

- TICA;
- Barclays MIS;
- Veda; and
- NTD (National Tenancy Database).

### **How we use your personal information**

We may use your personal information to deliver services you have requested (for example, responding to an inquiry for information concerning a property).

We may also use your personal information to send you periodic mailings containing information on new services and upcoming events that may interest you. If at any stage you decide that you do not wish to receive such material, please let us know by following the Opt-Out procedure below and we will ensure that your name is removed from our contact list.

### **Business without identifying you**

In some circumstances it will be necessary for First National Real Estate or its members to identify you in order to successfully do business with you, however, where it is lawful and practicable to do so, we will offer you the opportunity of doing business with us without providing us with personal information, for example, if you make general inquiries about real estate, the market, or ask a question via our National Website.

### **Direct marketing**

From time to time we may use your personal information to provide you with current information about real estate, offers you may find of interest, changes to our organisation, or new products or services being offered by us or any company with whom we are associated.

If you do not wish to receive marketing information, you may at any time decline to receive such information by telephoning us on 03 5941 4444 or by emailing us at [pakenham@nelsonpartners.com.au](mailto:pakenham@nelsonpartners.com.au).

If the direct marketing is by email you may also use the unsubscribe function. We will not charge you for giving effect to your request and will take all reasonable steps to meet your request at the earliest possible opportunity.

### **Disclosure**

We will only disclose your personal information to carry out business activities and functions as identified above.

### **First National Members**

In order to deliver our services to you, we disclose your personal information to the relevant independently owned and operated First National member or business partner who is best positioned to assist with your particular request. In doing so, we authorise these members to use your personal information in the ways described above. These members will handle your personal information in accordance with the Privacy Statements accessible through their websites.

Other than as stated in this Statement, we do not rent, sell or otherwise disclose your personal information to non-member companies or organisations without your prior consent.

### **Overseas Recipients**

We may disclose your personal information to overseas recipients such as international First National Real Estate member offices, should this be deemed necessary (for example, responding to an inquiry for information concerning a property). Countries could include:

- New Zealand;
- Vanuatu;
- Papua New Guinea; and
- Any other country where a First National member is based.

Information that you post in any social media public forum used by First National Real Estate or its members (such as but not limited to Facebook, Twitter or Instagram) may be exposed to overseas recipients.

Prior to disclosing any of your personal information to another person or organisation, we will take all reasonable steps to satisfy ourselves that:

- (1) the person or organisation has a commitment to protecting your personal information at least equal to our commitment, or
- (2) you have consented to us making the disclosure.

We may use cloud storage to store the personal information we hold about you. The cloud storage and the IT servers may be located outside Australia.

We may disclose your personal information to overseas entities that provide support functions to us. You may obtain more information about these entities by contacting us.

## **Opt-Out procedure**

In each direct marketing or promotional communication with you, we will advise you how to notify us if you do not wish to receive any further communications from us. If our correspondence is in the form of an e-mail, we will attach simple instructions on how you can unsubscribe from our mailing list. In any event you can opt-out from receiving marketing or promotional material from us by emailing us at [insert] or by contacting us by mail or telephone and asking to be removed from our mailing list.

You should note that by opting out of our mailing list, you will not automatically be removed from the mailing lists of other First National members or business partners to whom we have forwarded your personal information because we do not have control over those mailing lists.

If you no longer wish to receive material from the relevant First National member or business partner to whom we have forwarded your personal information, please follow their own Opt-Out procedure as described on their website or in their marketing material.

## **Access to your personal information**

You can find out what personal information we have about you, and amend or update your personal information, by e-mailing us at [pakenham@neilsonpartners.com.au](mailto:pakenham@neilsonpartners.com.au) or by telephoning us (contact details are provided at the beginning of this Statement).

We may charge a fee for our actual costs of retrieving and supplying the information to you, including staff costs in locating and retrieving the personal information, staff costs in reproducing and send the personal information, costs of postage etc.

Depending on the type of request that you make we may respond to your request immediately, otherwise we usually respond to you within seven days of receiving your request. We may need to contact other entities to properly investigate your request.

There may be situations where we are not required to provide you with access to your personal information, for example, if the information relates to existing or anticipated legal proceedings, or if your request is vexatious.

An explanation will be provided to you if we deny you access to the personal information we hold about you.

If any of the personal information we hold about you is incorrect, inaccurate or out of date you may request that we correct the information. If appropriate we will correct the personal information. At the time of the request, otherwise, we will provide an initial response to you within seven days of receiving your request. Where reasonable, and after our investigation, we will provide you with details about whether we have corrected the personal information within 30 days.

We may need to consult with other entities as part of our investigation.

## **Complaints**

Should you wish to make a complaint about management of your information, please email [pakenham@neilsonpartners.com.au](mailto:pakenham@neilsonpartners.com.au) or phone 03 5941 4444. First National Real Estate Neilson Partners will make a record of your complaint, verify the information received, and take steps to correct any deviation

from Australian Privacy Principles.

Should your complaint relate specifically to the management of your personal information by another independent member of the First National Real Estate network (i.e. Not First National Real Estate's corporate administration or us), the network will refer your complaint directly to the member for response.

We will acknowledge your complaint within seven days. We will provide you with a decision on your complaint within 30 days.

If you are dissatisfied with the response of our complaints officer you may make a complaint to the Privacy Commissioner which can be contacted on either [www.oaic.gov.au](http://www.oaic.gov.au) or 1300 363 992.

## **Sensitive information**

We will only collect sensitive information about you with your consent. Sensitive information is personal information that includes information relating to your racial or ethnic origin, political persuasion, memberships in trade or professional associations or trade unions, sexual preferences, criminal record, or health.

## **Unsolicited information**

If we receive unsolicited private information from you, we will as soon as practicable, but only if lawful, destroy the information or assure it is de-identified.

## **Security**

We use all reasonable efforts to keep your personal information secure, accurate and up-to-date. Your personal information is stored behind firewalls and personal information is accessible only by password access.

You can assist us to keep your personal information secure by ensuring that any username or password provided to you is kept confidential.

## **Disclaimer of responsibility for third party sites**

Our website contains links to other web sites including the websites of First National members. We are not responsible for the content on those other websites or their privacy practices.

## **How we may change this statement**

We reserve the right to amend or update this Statement so long as no change or amendment has a retrospective detrimental affect to your privacy rights.

This privacy policy came into existence 11 March 2014.