

## **PRIVACY POLICY**

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### **1. Policy Statement**

Stockdale & Leggo is committed to protecting the privacy and confidentiality of personal information it collects from its clients, service providers, contractors, and any other parties. Stockdale & Leggo recognises and acknowledges the importance of ensuring that the commercial confidentiality and privacy of those with whom we have professional and business dealings, is appropriately maintained. We recognise that disclosing information involves trust.

This statement sets out our policy relating to the collection, use and disclosure of personal information. Our policy complies with the legislative requirements set out by the Privacy Amendment (Private Sector) Act 2000; particularly the National Privacy Principles and is consistent with our obligations under the Estate Agents Act 1980 (Vic).

### **2. Scope**

This policy applies to all Stockdale & Leggo employees and extends and applies to all contractors and/or consultants working for, or on the behalf of, Stockdale & Leggo.

The workplace can extend beyond standard working hours and environments and may include social functions, conferences, celebrations, group functions and training sessions.

### **3. Policy**

The policy reflects the 10 National Privacy Principles.

1. Stockdale & Leggo must not be permitted to collect personal information unless it is necessary for its business activities.

#### ***Collection***

In most circumstances we collect information directly from clients, service providers and contractors. The information is likely to include the name, contact details, date of birth and any fact or opinion related to the business or professional service transacted or concluded through Stockdale & Leggo. Stockdale & Leggo may also obtain information from a third party.

In relation to individuals acting as service providers, contractors or agents, Stockdale & Leggo may collect names, contact details and relevant information concerning dealings with Stockdale & Leggo.

## ***Purpose of Collection***

In relation to Stockdale & Leggo's clients, this information is collected to provide real estate services more efficiently. In the provision of such services, Stockdale & Leggo may provide information to others to take action or make enquiries in relation to that service. For example, Stockdale & Leggo may need to use a name and some personal details in identifying an individual to accomplish the service and to properly inform others involved with or asked to assist in that service. We may also access information to send details about Stockdale & Leggo's activities or services.

Stockdale & Leggo may use personal information to access or use services provided by a service provider, contractor or agent.

2. Stockdale & Leggo must not use or disclose personal information for a purpose other than for which it was collected, unless that use was reasonably expected.

Stockdale & Leggo may also use and disclose personal information for purposes ancillary and consequential to the primary purpose of collection such as invoicing, related correspondence and accurate file and records management. Stockdale & Leggo may use the services of agents, service providers or contractors for this purpose. Stockdale & Leggo requires all such third parties to comply with the same level of privacy responsibility.

Upon receiving written instructions or according to the requirements of law, Stockdale & Leggo may disclose personal information to organisations such as regulatory authorities, government departments, courts, or other parties or advisors.

3. Stockdale & Leggo must take reasonable steps to ensure all personal information held is accurate, complete and up to date.

## ***Accuracy of Personal Information***

Stockdale & Leggo takes all reasonable steps to ensure that personal information is accurate, complete and up to date at the time of collection. If circumstances change or a record is not accurate, complete or up to date, please contact us immediately. Stockdale & Leggo will take all reasonable steps to amend the information in accordance with above criteria.

4. Stockdale & Leggo must take reasonable steps to protect the information from misuse or loss.

## ***Security of Information***

Personal information provided to us is stored on computer and paper based files as appropriate. The secure storage and use of information is

of paramount importance. We take all reasonable steps to protect the information from misuse or loss, or unauthorised access, modification or disclosure by means such as a password and network protection, and a secure storage of paper based and other records.

In addition, all staff with access to your personal information are bound by duties of confidentiality.

5. Stockdale & Leggo must make available a policy on privacy management.

A copy of our privacy policy is available on our website or a copy will be provided upon request by sending the policy by ordinary mail.

6. Stockdale & Leggo must make available information concerning an individual upon receiving a request by that individual.

### **Access**

Stockdale & Leggo will provide personal information of an individual upon receiving a written request for access from the individual concerned. However our discretion, duties and obligations under law may restrict access. Should access be denied we will provide you with the reasons in accordance with the law. If access is provided, a reasonable fee may be charged for time and other costs incurred in providing access.

7. Stockdale & Leggo must not use an identifier already in existence with another agency – for example, a tax file number to identify an individual.

### **Identifiers**

To avoid any risk of disclosing personal information we do not use tax file numbers nor any other information which may cause an individual to be identified by another organisation.

8. Wherever possible and within the law, Stockdale & Leggo acknowledges that a person has the right to remain anonymous in their dealings with organisations.

### **Anonymity**

By the nature of its business, Stockdale & Leggo will need to disclose personal information in relation to the provision of real estate services. If a request for anonymity can be accommodated, then Stockdale & Leggo will endeavour not to disclose personal information to the extent permitted by law.

9. Stockdale & Leggo may only transfer personal information to a party outside Australia if the country has similar privacy laws to the National Privacy Principles.

Stockdale & Leggo will advise you if the need to forward personal information overseas arises.

10. Stockdale & Leggo shall not collect "sensitive" information such as health information, and personal information that contains information about sensitive subjects, eg political opinions, religious beliefs and sexual preferences/practices unless the individual consents.

#### ***Sensitive Personal Information***

Stockdale & Leggo does not anticipate requiring sensitive personal information to provide its real estate services. Should this information be relevant to the provision of real estate services, Stockdale & Leggo will advise of the justification for any request for sensitive personal information.

#### **4. *Contacting Stockdale & Leggo***

If you have any queries concerning any aspect of this policy or our practices, or a concern or complaint contact the Operations Manager at Stockdale & Leggo Corporate Centre on (03) 9529 4955.