

HENNESSY REAL ESTATE

Privacy Policy

Effective date: 1 July 2026 **Version:** 2.0

This policy applies to personal information collected by Hennessy Real Estate.

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1. Our Commitment to Privacy

Hennessy Real Estate ("we", "us", "our") is committed to protecting your privacy and managing personal information openly and transparently.

We collect, hold, use and disclose personal information in accordance with:

- Privacy Act 1988 (Cth);
- Australian Privacy Principles (APPs);
- Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) (AML/CTF Act);
- Property and Stock Agents Act 2002 (NSW); and
- other applicable laws and regulatory requirements.

This Privacy Policy explains how we collect, use, disclose and protect your personal information when we provide real estate services, including:

- Residential property sales
- Commercial property sales and leasing
- Rural and lifestyle property transactions
- Property management and leasing services
- Auctions
- Marketing and property inspections
- Customer and client support services

2. What Personal Information We Collect

Depending on your dealings with us, we may collect:

Identification Information

- Full name
- Date of birth
- Residential address
- Postal address
- Telephone numbers
- Email address

Identity Verification Information

To comply with AML/CTF obligations, we may collect and verify:

- Driver licence details
- Passport details
- Medicare details
- Birth certificate details
- Citizenship or residency information
- Company and trust information
- Beneficial ownership information
- Proof of address documents
- Source of funds information
- Source of wealth information where required

Property-Related Information

- Property ownership information
- Land title details
- Rates notices
- Lease agreements

- Tenancy history
- Rental references
- Inspection attendance records

Financial Information

- Bank account details
- Mortgage or lender details
- Credit information where authorised
- Payment history
- Trust account transaction records

Employment Information

- Employer details
- Income verification documents
- Employment references

Website Information

When visiting our website we may collect:

- IP address
- Browser type
- Device information
- Website usage data
- Cookies and analytics information

Sensitive Information

We will only collect sensitive information where:

- you consent;
- the information is reasonably necessary; or
- collection is required or authorised by law.

3. Why We Collect Personal Information

We collect personal information to:

Real Estate Services

- Verify identity
- Appraise, market and sell property
- Conduct auctions
- Manage rental properties
- Assess tenancy applications
- Facilitate property transactions
- Maintain client records

AML/CTF Compliance

From 1 July 2026, real estate businesses are required to undertake specific customer due diligence activities and comply with AML/CTF obligations.

Accordingly, we may collect, verify, retain and disclose personal information to:

- Verify customer identity
- Verify beneficial ownership
- Conduct customer due diligence
- Conduct enhanced due diligence where required

- Monitor transactions
- Assess money laundering or terrorism financing risks
- Comply with reporting, monitoring and record-keeping obligations under the AML/CTF Act
- Respond to requests from AUSTRAC and other regulators

If you do not provide information required for AML/CTF compliance, we may be unable to provide services or conduct property transactions on your behalf.

Business Operations

We also use personal information:

- To communicate with you
- To administer our services
- To process payments
- To respond to enquiries
- To improve our services
- To meet legal obligations
- For dispute resolution and complaint management

4. How We Collect Personal Information

We may collect personal information:

Directly from You

- Property enquiry forms
- Listing appointments
- Property inspections
- Auction registrations
- Tenancy applications
- Emails and correspondence
- Telephone calls
- Meetings
- Website forms

From Third Parties

Where permitted by law, we may collect information from:

- Identity verification providers
- Credit reporting agencies
- Land title registries
- Government agencies
- Solicitors and conveyancers
- Mortgage brokers and lenders
- Referees and employers
- Other real estate professionals
- Publicly available records and databases

Surveillance and Security

Our offices and some properties may be monitored by CCTV for security and safety purposes.

5. Cookies and Website Analytics

Our website may use cookies and similar technologies to:

- Improve website performance

- Remember user preferences
- Monitor website traffic
- Analyse visitor behaviour
- Enhance security

You may disable cookies through your browser settings; however, some website functions may be affected.

6. How We Use and Disclose Personal Information

We only use and disclose personal information for purposes connected with:

- Providing real estate services
- Property transactions
- Property management
- AML/CTF compliance
- Legal compliance
- Business administration

We may disclose personal information to:

Property Transaction Participants

- Vendors
- Purchasers
- Landlords
- Tenants
- Property owners
- Auctioneers

Professional Advisers

- Solicitors
- Conveyancers
- Accountants
- Financial advisers

Service Providers

- Identity verification providers
- Property portals
- Marketing agencies
- IT providers
- Cloud storage providers
- Software providers

Government and Regulatory Authorities

Where required or authorised by law, we may disclose information to:

- AUSTRAC
- Australian Taxation Office
- NSW Fair Trading
- Courts and tribunals
- Law enforcement agencies
- Other government bodies and regulators

This may occur without notifying you where permitted or required by law.

7. Overseas Disclosure

Some technology providers, cloud services and software platforms used by Hennessy Real Estate may store or process information outside Australia.

Where personal information is disclosed overseas, we take reasonable steps to ensure that overseas recipients handle it in a manner consistent with the Australian Privacy Principles.

Where practicable, we will identify the countries in which overseas recipients are located.

8. Direct Marketing

We may use your personal information to provide:

- Property alerts
- Market updates
- Agency newsletters
- Information about our services

You may opt out of marketing communications at any time by:

- clicking an unsubscribe link; or
- contacting us using the details below.

We will not use sensitive information for marketing without your consent.

9. Security of Personal Information

We take reasonable steps to protect personal information from:

- Misuse
- Interference
- Loss
- Unauthorised access
- Modification
- Disclosure

Security measures include:

- Secure office access
- Password-protected systems
- Multi-factor authentication
- Secure cloud environments
- Staff privacy training
- Data breach response procedures

Where personal information is no longer required, we securely destroy or de-identify the information unless we are legally required to retain it.

10. Access and Correction

You may request access to personal information we hold about you.

You may also request correction of information that is:

- Inaccurate
- Outdated
- Incomplete
- Irrelevant
- Misleading

Requests should be made in writing to our Privacy Officer.

We may refuse access or correction where permitted by law, but will explain the reasons for any refusal.

11. Anonymity and Pseudonyms

Where lawful and practical, you may interact with us anonymously or using a pseudonym.

However, for most real estate transactions and AML/CTF compliance activities, identification is required and anonymity will not be possible.

12. Complaints

If you believe we have breached your privacy rights, please contact our Privacy Officer.

We will:

1. Acknowledge your complaint.
2. Investigate the matter.
3. Respond within a reasonable timeframe.
4. Advise you of the outcome.

If you are dissatisfied with our response, you may contact:

Office of the Australian Information Commissioner (OAIC)

Telephone: 1300 363 992

Website: www.oaic.gov.au

13. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in legislation, regulatory requirements or our business practices.

The most current version will always be available on our website.

14. Contact Us

Privacy Officer

Hennessy Real Estate

Address: [Insert office address]

Phone: [Insert phone number]

Email: [Insert privacy email address]

Website: www.hennessyrealestate.com.au