

DNA PROPERTY GROUP PRIVACY POLICY

A copy of this document can be downloaded as a PDF [here](#).

Document date: 23 September 2025

SUMMARY OVERVIEW AND CONSENT

1. We are DNA PROPERTY GROUP PTY LTD ACN: 663 464 417 (**Provider, we, us** and our). We are committed to respecting your privacy. This page informs you of our policies regarding the collection, use and disclosure of personal data when you use our Services and the choices you have associated with that data.
2. We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy.
3. Please note, should you engage our Services, we do not support pseudonymous or anonymous interactions.

DEFINITIONS (GENERAL)

Website

4. The Website is the website located at the domain dnaproperty.com.au operated by us.

Services

5. The Services are the Website and our residential sales services.

Personal Data

6. Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

Usage Data

7. Usage Data is data collected automatically and either generated through use of the Services or from the infrastructure underpinning the Services.

Cookies

8. Cookies are small files stored on your device (computer or mobile device). When you visit our website, we may collect information from you automatically through cookies or similar technology. For more information, visit: <https://www.allaboutcookies.org/>
9. For more information about our cookies, please see our Cookie Policy (see heading below "CHANGES TO THIS DOCUMENT AND OUR OTHER DOCUMENTS" for link to policy).

Data Subject (or User)

10. Data Subject is any living individual who is using our Service and is the subject of Personal Data.

Information Collection and Use

11. We collect several different types of information for various purposes in order to provide and improve our Services.
12. We may use the services of various Service Providers in order to process your data more effectively.
13. Our Service is targeted towards Property Owners, Property Investors Buyers Agents, Sales Agents, Developers, Builders, Tradesmen and like entities. Our Service does not target or address anyone under the age of 18 but we do collect information on persons under the age of 18 years old.

DEFINITIONS (BODIES AND LAWS)

Australian Privacy Principles (APP)

14. Reference to APP in this policy means the Australian Privacy Principles contained in Schedule 1 of the *Privacy Act 1988* (Cth). These APPs govern the content of privacy policies and rights under Australian law. We take pride in our adherence to these Principles.
15. A summary of the APPs are available at: <https://www.oaic.gov.au/privacy/australian-privacy-principles/australian-privacy-principles-quick-reference>

The Office of the Australian Information Commissioner (OAIC)

16. The OAIC is the principal body which administers Australia's privacy laws and the Australian Privacy Principles.
17. The OAIC website is: <https://www.oaic.gov.au/>

ABOUT THIS POLICY

18. This policy is made to comply with the privacy laws of Australia, namely the Australian Privacy Principles (APPs) within the *Privacy Act 1988* (Cth) (**AU Privacy Law**).
19. In this policy **Protected Data** refers to either: Personal Information, Sensitive Information and Credit Information, under the AU Privacy Law.

Is this policy a contract?

20. This Privacy Policy is not a contract itself. It is a compliance document, that is, it is a notice required by law for us to explain certain things to the public. However, there may be other contracts which can include all or part of this policy as relevant to those contracts.
21. Importantly, our website terms require you to have read and understood this policy and provide the following required consents (see at the end of this policy for a link to these terms along with links to other policies).

TYPES OF DATA COLLECTED

Specific Data

22. We use your data to provide and improve the Services. By using the Services, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our Terms and Conditions (see at the end of this document for links to other documents).
23. While using our Services, in particular when creating and registering your account, we may ask you to provide us with:
- a. certain personally identifiable information that can be used to contact or identify you ("Personal Data"); and
 - b. Other data which is not a usual form of protected data under privacy laws.
24. This data includes but is not limited to:

Category	Types of Data	Purpose
Personal Information	Names (first and last)	Collected on first point of contact/enquiry, so to identify and contact you
Personal Information	Signatures	Collected inadvertently on first point of contact/enquiry as proof you have signed / approved relevant documents
Personal Information	Physical / postal address	Collected after a phone/email conversation so to identify and contact you
Personal Information	Email address	Collected on first point of contact/enquiry, so to identify and contact you
Personal Information	Phone number	Collected on first point of contact/enquiry, so to identify and contact you
Personal Information	Date of birth	Collected after a phone/email conversation so to identify and contact you
Other Information	Investment property preferences	Collected when enquiring on properties for sale in order to confirm Service details.
Other Information	Financial position (ready to buy)	Collected when enquiring on properties for sale in order to confirm Service details.

General Data- Usage and Feedback

25. We may also collect the following information on how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your device's:
 - a. Internet Protocol address (e.g., IP address), or geo-location information;
 - b. browser type and browser version;
 - c. the screens and interfaces within our Service that you visit;
 - d. the time and date of your visit;
 - e. the time spent on those interfaces;
 - f. unique device identifiers (like any device ID);
 - g. device type;
 - h. computer and connection information; and
 - i. other diagnostic data.
26. We also can collect information provided by you in any feedback or correspondence from time to time with:
 - a. customer surveys;
 - b. details of the Services we have provided to you or that you have enquired about, including any additional information necessary to deliver the Services and respond to your queries; and
 - c. any other information necessarily required in order to facilitate and improve your dealings with us and the Services.

Identification, Tracking & Cookies Data

27. We use cookies and similar tracking technologies to track the activity on our Service and we hold certain information.
28. Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags and scripts to collect and track information and to improve and analyse our Service.
29. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.
30. Examples of cookies we use are:
 - a. Session Cookies. We use Session Cookies to operate our Service.
 - b. Preference Cookies. We use Preference Cookies to remember your preferences and various settings.
 - c. Security Cookies. We use Security Cookies for security purposes.
31. More information on cookies and which ones we use is set out in our cookie policy (see heading below "CHANGES TO THIS DOCUMENT AND OUR OTHER DOCUMENTS" for link to policy).
32. To provide clarification on possible identifiers for you-
 - a. You may be able to browse our Website anonymously if you disable any cookies and tracking;

- b. You may be able to browse our Website pseudonymously, only being identified by the Cookies and tracking IDs from other analytics providers (see section on Third Parties for this).
- c. Due to the nature of the services we provide it is only practicable or reasonable for City Beach to transact and correspond with you on a named basis. Your Personal Information or Personal Data may be required to provide you with our products and services, or to resolve any issue you may have.

COLLECTION AND USE OF DATA

Collection

- 33. We may collect data either directly from you, or from third parties, when you:
 - a. register for the Services;
 - b. interact with the Services;
 - c. communicate with us through correspondence, chats, email or otherwise share information with us;
 - d. engage in other related social applications, services or websites;
 - e. interact with our Services, content, advertisements and/or marketing material;
 - f. invest in our business or enquire about our business.

Use

- 34. We do not sell any Personal Data to third parties.
- 35. We use the collected data for various purposes:
 - a. To enable you to access and use our Services (on the grounds of fulfilment of our contract with you);
 - b. To operate, maintain, protect, improve and optimise our Services (on the grounds of fulfilment of our contract with you);
 - c. To notify you about changes to our Services (on the grounds of our legitimate interests in ensuring you are aware of any relevant changes);
 - d. To allow you to participate in interactive features of our Services when you choose to do so (on the grounds of your consent);
 - e. To provide or administer rewards, surveys, contests or other promotional activities or events;
 - f. To provide customer support (on the grounds of our legitimate interests in ensuring you receive the help you need when accessing our Services);
 - g. To gather analysis or valuable information so that we can improve our Services;
 - h. To monitor the usage of our Services;
 - i. To gather analysis or valuable information so that we can improve our Services (on the grounds of your consent);
 - j. To monitor the usage of our Services (on the grounds of your consent);

- k. To detect, prevent and address technical issues (on the grounds of our legitimate interests in maintaining the functionality of the Services);
 - l. To provide you with notifications, and information about other Services we offer unless you have opted not to receive such information (on the grounds of your consent). This correspondence may occur by email, text message or another electronic format;
 - m. To comply with our legal obligations, resolve any issues our users may encounter, and enforce our agreements with third parties; and,
 - n. To consider your employment application.
36. We will only collect and use data necessary for the primary purpose it is collected for, or other excepted purposes outlined in this policy.

HANDLING AND DISCLOSURE OF DATA

Retention of Data (when)

37. We will retain your Personal Data only for as long as necessary, which for our legal compliance may be up to ten (10) years in case of disputes or legally required audits.
38. We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer periods.

Transfer and Storage of Data (where)

39. We use the following methods for storing data including back-ups:
- a. computers located in Australia
 - b. cloud storage and file-share services, (who form part of our Service Providers referred to later), currently we use Google Drive but may change to similar providers from time to time.
40. Your information, including Personal Data, may be transferred to – and maintained on – servers located outside of Australia. By providing your data to us you provide Your consent to the transfer of this data.
41. We will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of your data and other personal information. Some measures we take to bolster security include MultiFactor Authentication.

Disclosure of Data (who) – General Disclosure

42. In addition to Service Providers and Marketing Agencies (see next headings) we generally disclose your information to:
- a. ***(Internal and related entities)*** Our employees and related bodies corporate potential agents, business partners or partners;
 - b. ***(Payment facilitators)*** Payment systems operators (for example, merchants receiving card payments);
 - c. ***(Sponsors)*** Sponsors or promoters of any competition that we conduct via our services;
 - d. ***(Agents in our supply chain)*** If we are involved in a collaboration with a third party which involves collecting data and you subscribe to a mailing list associated with this collaboration, your Personal Data may be transferred to this third party so that they may

send you marketing in accordance with the consent you provided. Your data will only be given to the core third party involved in the associated collaboration;

- e. **(Entities during business transactions)** If we are involved in a merger, acquisition or asset sale, your Personal Data may be transferred. We will provide notice before your Personal Data is transferred and becomes subject to a different Privacy Policy;
- f. **(Law enforcement agencies)** Under certain circumstances, we may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency); and
- g. **(Legal and other professional advisors)** We may disclose your Personal Data to third parties (including legal advisors) in the good faith belief that such action is necessary to comply with a legal obligations, protect and defend our rights or property; prevent or investigate possible wrongdoing in connection with the Service; protect the personal safety of users of the Service or the public; or protect against legal liability.

Disclosure of Data (who) – Service Providers

43. We employ third party companies and individuals to facilitate our Service ("Service Providers"), provide the Service on our behalf, perform Service-related services or assist us in analysing how our Service is used. These third-party Service Providers include:

Name	Service	Location	Data Shared
Reapit Sales	Sales CRM & advertising properties	Australia	All data is stored in this program
Realworks	real estate forms & templates	Australia	Name, email, number, address
DocuSign	Digital signing	Unknown	Name, email, number, address
realestate.com.au	Advertising properties	Australia	Property address
Move Me In	Utility connections	Australia	Name, email, number, address
Mailchimp	Mailchimp acts as a <i>data processor</i> (or "service provider") while we remain the <i>data controller</i>		Name, Email, Address, Marketing Preference (two-factor authentication is used to increase the security of this data)
Google Analytics			Site Usage Data (no customer names etc)

44. When you provide your personal information to us, you consent to the disclosure of your information outside of Australia and acknowledge that we are not required to ensure that any personal information disclosed is handled in accordance with Australian Privacy Law. However, we are committed to taking all reasonable steps to ensure that any personal information disclosed to overseas recipients is handled in a way that complies with the Australian Privacy Principles.

Disclosure of Data (who) – Marketing Agencies

45. Google Analytics:
- a. This is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualise and personalise the ads of its own advertising network.
 - b. You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the

Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visits activity.

- c. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>.

46. Google AdWords

- a. This is a remarketing service provided by Google Inc. We only use Google AdWords if we have your consent to use the relevant cookies in line with our cookie policy.
- b. You can opt-out of Google Analytics for Display Advertising and customise the Google Display Network ads by visiting the Google Ads Settings page: <http://www.google.com/settings/ads>.
- c. Google also recommends installing the Google Analytics Opt-out Browser Add-on - <https://tools.google.com/dlpage/gaoptout> - for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.
- d. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>

47. Facebook, Instagram and Meta:

- a. Instagram and Facebook's remarketing service is provided by the Meta company which we understand operates of [facebook.com](https://www.facebook.com) and [instagram.com](https://www.instagram.com). We only use these remarketing services if we have your consent to use the relevant cookies in line with our cookie policy.
- b. You can learn more about Instagram's privacy requirements here <https://help.instagram.com/155833707900388>.
- c. You can learn more about interest-based advertising from Facebook by visiting this page: <https://www.facebook.com/help/164968693837950>.
- d. To opt-out from Facebook's interest-based ads, follow these instructions from Facebook: <https://www.facebook.com/help/568137493302217>.
- e. Facebook adheres to the Self-Regulatory Principles for Online Behavioural Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through:
 - i. The Digital Advertising Alliance in the USA <http://www.aboutads.info/choices/>, the
 - ii. The Digital Advertising Alliance of Canada <http://youradchoices.ca/> or
 - iii. The European Interactive Digital Advertising Alliance <http://www.youronlinechoices.eu/>; or
 - iv. Via opt-out using your mobile or computer device settings.
- f. For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: <https://www.facebook.com/privacy/explanation>

48. TikTok:

- a. TikTok's remarketing service is provided by TikTok Inc. (USA company incorporated in the state of California). We only use TikTok's remarketing services if we have your consent to use the relevant cookies in line with our cookie policy.
- b. You can learn more about the privacy practices and policies of Pinterest by visiting their Privacy Policy page: <https://www.tiktok.com/legal/page/us/privacy-policy/en>

49. LinkedIn

- a. LinkedIn remarketing service is provided by LinkedIn Corporation (USA company). We only use LinkedIn remarketing services if we have your consent to use the relevant cookies in line with our cookie policy.

- b. Information about LinkedIn marketing/ads can be found at: <https://business.linkedin.com/marketing-solutions/> and <https://www.linkedin.com/legal/ads-policy>.
- c. You can opt-out from Pinterest's interest-based ads by enabling the "Do Not Track" functionality of your web browser or by following Pinterest instructions: <http://help.pinterest.com/en/articles/personalization-and-data>
- d. You can learn more about the privacy practices and policies of LinkedIn by visiting their Privacy Policy page: <https://www.linkedin.com/legal/privacy-policy>

YOUR RIGHTS

Our Complaints Process

- 50. You can submit complaints to us using the contact information provided below under the Contact Us heading.
- 51. Our Data Protection Officer will review your complaint and will respond to you with further details as soon as practicable.

Under the APPs

- 52. You have the right, under the APPs to request access to the Personal Information we hold for you (and confirmation if we hold any such data). You also have the right to request the correction of such information.
- 53. You can submit complaints to us using our contact details below (see contact details); for digital notices we accept multiple formats of Word, PDF and RTF documents.
- 54. You can also lodge a complaint with the OAIC if the privacy/data issue hasn't been resolved. For more information, please visit <https://www.oaic.gov.au/privacy/privacy-complaints/>.

CHANGES TO THIS DOCUMENT AND OUR OTHER DOCUMENTS

- 55. We may update this document from time to time. Any changes will be notified via posting the updated information on this page.
- 56. We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this document.
- 57. You are advised to review this document periodically for any changes. Changes to this document are effective when they are posted on this page.
- 58. Here is a list of our other policies and agreements:
 - a. Privacy Policy: [\[LINK\]](#)
 - b. Cookies Policy: [\[LINK\]](#)
 - c. Terms of Use: [\[LINK\]](#)

CONTACT US

- 59. If you have any questions about this document, the data we hold, or you would like to exercise one of your rights regarding the data, please contact us.

Company	DNA PROPERTY GROUP PTY LTD ACN: 663 464 417
Attention	Privacy and Data Protection Officer
Email	info@dnaproperty.com.au

Phone	(07) 3472 7327
Postage	C/ Macpherson Kelley Lawyers L16, 324 Queen Street, Brisbane, QLD 4000, Australia

END OF DOCUMENT

This policy has been prepared with our legal team at
Macpherson Kelley Lawyers

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