

# Privacy Policy

Last Updated: 27 June 2019

## Introduction

This Privacy Policy sets out how we handle personal information.

We value your privacy and endeavour to comply with Australian privacy legislation where it applies to us. This includes adopting practices, procedures and systems to ensure that we comply with applicable legislation.

This Privacy Policy is in addition to any rights you may have under the law.

## Definitions

For the purpose of this Privacy Policy:

- **“personal information”** has the meaning defined under the Privacy Act;
- **“Privacy Act”** means the *Privacy Act 1988* (Cth) and related legislation;
- **“sensitive information”** has the meaning defined under the Privacy Act;
- **“we”, “us” and “our”** means Real Estate Coaching Hub Pty Ltd A.C.N. 600 425 581;
- **“you” and “your”** means you as the user of this website, or as an individual about whom we collect, hold or use personal information;

## Updates

We may update this Privacy Policy at any time by posting an updated version on our website.

If you are a customer, or have otherwise agreed to receive communications from us, you may also receive a notification from us (for example, by email) when we release an updated Privacy Policy.

We also recommend that you revisit the Privacy Policy page on our website frequently to view any changes to this Privacy Policy.

You may ask us for a copy of our Privacy Policy at any time by contacting us.

## Kinds of personal information we collect

When you enquire about our services or when you become a client of Real Estate Coaching Hub, a record is made which includes your personal information.

We may collect the following kinds of personal information:

- information about your identity, such as your name;
- your age or date of birth;
- your sex;
- your contact details, such as your email address, residential address, postal address or telephone number;
- information about your device, such as the make, model, operating system, IP address and internet browser;
- information about your browsing behaviour, through our use of analytics services, cookies, tracking links, web beacons or similar technologies;

- your location (if location services are enabled on your device);
- financial information, where necessary to process a transaction;
- other personal information provided as part of a website form submission, enquiry or other communication with us; and
- any additional personal information that you provide to us, or authorise us to collect, as part of your interaction with Real Estate Coaching Hub.

#### Sensitive Information

We do not actively seek to collect sensitive information. However, it is possible that we may collect sensitive information if it is provided to us by you or a third party.

If we do collect sensitive information:

- it will be handled in accordance with this Privacy Policy;
- any sensitive information that is not required will be de-identified or destroyed.

#### Financial Information

We do not collect or store cardholder data except to the extent required to process card transactions and for transaction verification purposes.

Dealing with us anonymously or under a pseudonym

You may deal with us anonymously or under a pseudonym.

However, in some circumstances, we may not be able to provide you with a service or product if you do not identify yourself to us or provide us with necessary personal information. For example, if you are a customer, we will need to identify you and collect personal information about you in order to be able to transact with you.

#### Providing personal information about third parties

If you provide personal information about another individual to us, for example by submitting an enquiry on behalf of a third party individual you must:

- obtain the consent of that individual before providing their personal information to us; and
- make that individual aware of this Privacy Policy.

#### Personal information about children

Our products and services are intended mainly for use by adults. However, we may collect information about children. We do not actively seek to collect personal information concerning children.

If you provide information about a child, you must:

- obtain the consent of the child's parent or legal guardian before providing the child's personal information to us; and
- make the child's parent or legal guardian individual aware of this Privacy Policy.

How we collect and store personal information

#### We may collect personal information through use of the following methods:

- direct contact with us, such as email, SMS, instant message, telephone or other communication;
- submission of a form, application, request or enquiry that contains personal information;

### Web technologies

We use website analytics technologies, such as cookies, tracking links, web beacons and similar technology. We do not use these technologies, or the data obtained from them, to specifically identify individuals.

However, we may store and use aggregated, de-identified information and data for the purpose of:

- analysing usage of our website, social media or email communications;
- identifying and analysing market segments (such as demographics) of our user base;
- maintaining a user's session or preferences.
- improving our website, social media and email communications.

### Collection of personal information from third parties

Personal information may also be indirectly collected from a third party if they provide it to us using any of the above methods.

### Security of personal information

The personal information we collect is stored in a secure data centre maintained by our service providers.

Connections to our website are encrypted using the HTTPS protocol.

We have also engaged third party service providers to provide security monitoring and routine testing of our website.

While these measures assist in protecting the security of personal information, we strongly recommend that you adopt good online security practices.

### Retention of personal information

If you are a customer, personal information provided in connection with your account will be deleted or de-identified upon cancellation of your account, or at such time when it is no longer reasonably required by us.

We may still retain personal information to the extent and for a period that it is necessary to enable us to verify or evidence the integrity of a transaction, or otherwise to comply with legal or taxation requirements.

We may retain de-identified, aggregated information for the purpose of analytics, market research and to improve the products and services we offer. However, this de-identified, aggregated information is not capable of identifying any individual.

### Purposes for which personal information is collected, used and disclosed

We collect, store and use the personal information collected for the following purposes:

- to provide you with the products and services we offer on this website or in the course of our business activities;
- to process transactions, including payments, orders, delivery and debt collection;
- to maintain and enhance your user experience on our website, including user logins, user accounts, browser sessions, user preferences and website features; and
- to understand how individuals use our website, our products and our services and to further develop and enhance the products and services we offer.

## Direct Marketing

If you become a customer, or subscribe to our mailing list, you agree that we may use your personal information to provide direct marketing to you, which may include:

- providing information to you about our products and services;
- newsletters;
- announcements;
- information about our current or forthcoming promotions or competitions.

Each time we send direct marketing, you will have the opportunity to opt out of receiving further direct marketing material.

You may also opt out of direct marketing, or change your direct marketing preferences, at any time by contacting us.

We may engage a service provider to provide direct marketing services on our behalf. However, we do not sell or disclose personal information to third parties for direct marketing purposes without your express consent.

### Disclosure of personal information to third parties

We may disclose personal information to third parties for the following purposes:

- in the course of obtaining services from our service providers, such as information technology services, website maintenance and development and to obtain professional advice including legal or taxation advice;
- in the course of conducting market research or obtaining usage analytics about our website (such as through the use of Google Analytics or similar tools);
- for the purpose of processing transactions, debt collection and account management.

We may also disclose personal information to a third party where we are permitted or required to do so by law.

### Overseas transmission of personal information.

Some of our website and email accounts are hosted on servers located outside of Australia. These facilities are maintained by trusted third party service providers.

We may transmit or disclose personal information to individuals or organisations that are based outside Australia, including:

- by communicating with individuals or organisations who are located outside Australia, or where such communications are routed through an overseas service provider;
- to third party service providers who are based outside Australia, such as website analytics providers and social media platforms, in connection with obtaining these services.

It is not possible to ascertain every jurisdiction to which personal information may be disclosed or transmitted, as this will vary depending on the recipient. The majority third party services providers and social media platforms we engage with outside Australia are based in the United States.

You acknowledge that individuals and organisations may not be subject to Australian privacy laws.

Where possible, we will take reasonable steps to ensure that individuals or organisations located outside Australia are bound by similar legislation or regulations, agree to abide by Australian privacy law, or agree to treat personal information in a way similar to us.

### Accessing and updating your personal information

Under Australian privacy law, you have a right to request access to, and correction of, the personal information that we hold about you.

You may access, or request correction of, the personal information we hold about you by contacting us using the details provided at the end of this Privacy Policy. Your enquiry should be in writing and should contain sufficient details about the nature of your enquiry.

We will endeavour to respond to your enquiry within a reasonable timeframe. Usually this will be within 30 days after receiving your enquiry, however, we may require additional time to respond if your enquiry does not include necessary information, is complex or involves archived or historical information.

You acknowledge that in some circumstances, we may be unable to respond to your enquiry, such as when the enquiry would be contrary to law, or if the response would adversely affect the privacy of another individual.

### Complaints

If you have a complaint about our handling of your personal information, you may contact us using the details provided at the end of this Privacy Policy. Your complaint should be made in writing and should set out the relevant details of the complaint.

We will endeavour to respond to your complaint within a reasonable time. Usually this will be within 30 days after receiving your complaint, however, we may require additional time to respond if your complaint does not include necessary information, is complex or involves archived or historical information.

If you are unsatisfied with our response to your complaint, you may be entitled to refer the complaint to the Office of the Australian Information Commissioner (OAIC). Further information about the OAIC may be obtained on their website at <https://oaic.gov.au>.

### Contact details

Enquiries or Complaints may be addressed to the following contact:

Darren M. Giles  
The Privacy Officer  
Real Estate Coaching Hub Pty Ltd A.C.N. 600 425 581  
Postal Address: PO Box 300, SANDGATE QLD 4017, Australia  
Email: [privacy@realestatecoachinghub.com](mailto:privacy@realestatecoachinghub.com)