

Palm Beach Holiday Rentals and Luxury Beach Houses undertake to protect your privacy whilst delivering our services, products and content. The information collected is primarily to it make more enjoyable and rewarding to use our leasing services.

Palm Beach Holiday Rentals and Luxury Beach Houses understand and respect that protection of your personal information is important to you. This document sets out how we collect, use, disclose, retain and manage your privacy information and how we comply with our obligations under the Privacy Act 1988 (Cth) (Privacy Act).

By using our services and by using and continuing to use our websites you consent to us collecting, maintaining, using and disclosing your personal information in the way described in this Privacy Policy. This policy applies only to Palm Beach Holiday Rentals and Luxury Beach Houses websites and not other companies or organisation's websites to which we are linked.

## **1. Why do we collect personal information and how do we use it?**

a) We offer a range of services including, without limitation, providing appraisals of properties acting as a real estate agent for the buying and selling of properties, leasing properties, advertising properties, connection and disconnection of utility services.

b) We collect personal information to enable us to provide our Services. This includes:

- i. processing inquiries;
- ii. facilitating the advertising of properties;
- iii. recording persons entering a landlord or seller's property (e.g. for inspection, survey or appraisal purposes);
- iv. facilitating the leasing of properties (including advertising the properties) and acting as property manager/concierge
- v. for our internal business operations;
- vi. complying with our legal obligations;
- vii. advising clients of additional services or information which may be of interest;
- viii. providing your contact details to our partners and contractors who provide us with services;
- ix. maintaining and updating our business infrastructure and systems;
- x. statistical purposes;
- xi. promoting and advertising our business, products and services;

c) If we do not collect the personal information or if any of the personal information you provide is incomplete or inaccurate, we may not be able to provide the Services or those Services may be compromised.

d) This privacy policy applies to all situations in which we collect personal information directly from you. This includes, but not limited to, telephonic communication, communication by email and post, in person and through individuals accessing our websites.

## **2. What personal information do we collect?**

The personal information we collect will depend on the Service or Services we provide to you. It may include:

- a) your name, residential or business address, contact phone numbers, email address;
- b) family details;
- c) employment details;
- d) insurance details;
- e) credit card and banking details;
- f) Sensitive Information;
- g) Credit Related Information;
- h) references (e.g. to support rental arrangements);
- i) copies of photo identification (e.g. driver's licence, passport, student ID); or
- j) any other personal information relevant to the Service we are providing to you.

### **3. How do we collect personal information?**

- a) We aim to collect personal information directly from you.
- b) We also collect personal information:
  - i. from your representatives (e.g. solicitor, accountant or financial adviser);
  - ii. through our Websites and by other electronic communication channels;
  - iii. when sent to us by email or other communication from third parties;
  - iv. from publicly available sources of information including social media;
  - v. when we are required to do so by law;
  - vi. from Strata or Bodies Corporate, Strata or Body Corporate Managers and On-Site Managers;
  - vii. when you enter into a competition or promotion with us or participate in a survey including an 'after leasing service' follow-up; and
  - viii. from our own records;
  - ix. from our employees;
  - x. from our suppliers or partners; and
  - xi. from private vendors.
- c) If you supply personal information to us about another person, you represent and we accept it on the basis that you are authorised to do so and that the relevant person has consented to the disclosure to us.
- d) Each time you visit our Websites our server collects personal and non-personal information. This information may be gathered from both mobile and static devices. This information may include, but is not limited to: the type of browser you use, your operating system, your internet service provider, your Internet Protocol (IP) address, your mobile service carrier, the online address of a previously visited site etc. We may use Cookies and log files to monitor and improve our online presence.
- e) A Cookie is a piece of information that our web server may send to your machine when you visit our Websites. The Cookie is stored on your machine, but does not identify you or give us any information about your computer. A Cookie helps us to recognise you when you re-visit the Website and to co-ordinate your access to different pages on the Websites. With most Internet Browsers, you can erase Cookies from your computer hard drive, block all Cookies, or receive a warning before a Cookie is stored. If you want to do this, refer to your Browser instructions or help screen. Any information we seek to collect via cookies etc is used to better understand our customer needs and the services they are seeking from us. Cookies assist us in providing better and faster services.
- f) Links on our Websites may take you outside our network. These links are provided in good faith. However, we are not responsible for third party sites and accept no responsibility for the content, accuracy, security or function of third party sites.

### **4. Considerations when you send information to us**

- a) While we do all we can to protect your privacy, including investing in specialist security software, no data transfer over the Internet is 100% secure.
- b) If you provide personal information to us electronically, there are ways you can help maintain the security of the information. These include:
  - i. always close your browser when you have finished your user session;
  - ii. do not provide personal information by using a public computer; and
  - iii. never disclosing your user name and password to another person.
- c) You are responsible for all actions taken using your username, email or password. If at any time you believe your username or password have been compromised, change your password and contact us immediately.

## **5. Disclosing personal information**

We may disclose your personal information to third parties in certain circumstances including:

- a) if you agree to the disclosure;
- b) when we use it for the purpose for which it was collected, e.g. as part of a leasing process or in the provision of another Service;
- c) to employees, contractors and service providers who assist us in operating our business and providing our Services;
- d) in circumstances where you would reasonably be expected to consent to information of that kind being passed to a third party;
- e) where disclosure is required or permitted by law;
- f) to our Related Entities;
- g) if disclosure will prevent or lessen a serious or imminent threat to someone's life or health; or
- h) where it is reasonably necessary for the enforcement of the criminal law, a law imposing a pecuniary penalty or for the protection of public revenue.

All third parties with whom personal information is shared are required to meet our standards of personal information protection. However, we are not responsible for the conduct of third parties with respect to the handling of your personal information and we recommend that you check their privacy policies. You consent to us using your information for marketing purposes which include our Services as well as our business partners.

We do not trade or sell your personal information however we may share your data with our energy, telecommunication, fuel and insurance clients for the purposes of facilitating your request. We always seek your consent prior to sharing your data with our clients, vendors and partners.

## **6. How your information is stored**

- a) We take reasonable steps to securely store personal details and information. This includes electronic and physical security measures, staff training, use of password protection software. Details of our security systems are available by contacting our Privacy Officer.
- b) When the personal information that we collect is no longer required, we will remove or de-identify the personal information as soon as reasonably possible. We may, however, retain personal information for as long as is necessary to comply with any applicable law, for the prevention of fraud, for insurance and governance purposes, in our IT back-up, for the collection of any monies owed and to resolve disputes.

## **7. Marketing and opting out**

- a) We do not use Sensitive Information for marketing purposes.
- b) If at any time you no longer wish to receive any additional marketing material from us or do not want your information disclosed for direct marketing purposes, contact our Property Manager/Marketing Manager and we will remove your details from our marketing database.

## **8. How you can update, correct, or delete your personal information**

- a) You may request access to your personal information or correct any inaccurate or out of date information by clicking here or contacting our Privacy Officer using the details below.
- b) You may request the source of any information we collect from a third party. We will provide this at no cost, unless under the Privacy Act or other law there is a reason for this information being withheld.
- c) If there is a reason under the Privacy Act or other law for us not to provide you with information, we will give you a written notice of refusal setting out the reasons for the refusal except to the extent it would be unreasonable to do so and the mechanisms available to you to complain about the refusal.

- d) You should also contact us immediately if you believe:
  - i. someone has gained access to your personal information;
  - ii. we have breached our privacy obligations or your privacy rights in any way; or
  - iii. you would like to discuss any issues about our privacy policy.

### **13. Changes to our Privacy Policy**

- a) This document sets out our current Privacy Policy.
- b) Our Privacy Policy will be updated from time to time. You should review our Privacy Policy each time you visit our Website or provide us with personal information.
- c) If you would like further information on our Privacy Policy or if you have any concerns over the protection of the information you have given to us or that we have collected from others, please contact us by contacting our Privacy Officer at:

Address: 1073 Barrenjoey Road, Palm Beach NSW 2108  
Telephone: +61 02 9974 5999  
Fax: +61 2 9974 5720  
Email: [info@luxurybeachhouses.com.au](mailto:info@luxurybeachhouses.com.au) / [hmanager@ljhpb.com.au](mailto:hmanager@ljhpb.com.au)

More information about your rights and our obligations in respect to privacy and information on making a privacy complaint are available from the Office of the Australian Information Commissioner by:

website - [www.oaic.gov.au](http://www.oaic.gov.au)  
mail - GPO Box 5218 Sydney NSW 2001  
email - [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)