

PRIVACY POLICY (CLIENTS)

TABLE OF CONTENTS

1. Overview
2. Purpose of Collection
3. Disclosure of your Personal Information
4. Disclosure to overseas recipients
5. Consequences if some or all the personal info is not collected
6. Security of your Personal Information
7. Correction of your information
8. Opting out of marketing
9. Complaints
10. How to contact us

OVERVIEW

1.1 This privacy policy outlines how the Luton Franchisor, its related bodies corporate, licensees and all entities otherwise entitled to use the Luton Franchisor brand (“Luton”, “us”, “we”) collect, hold, use, disclose and otherwise manage your personal information and complies with our obligations under the *Privacy Act 1988* (Cth). It applies to all of your dealings with the Luton Franchisor.

1.2 You will always be able to access a current version of our privacy policy on our website.

1.3 Occasionally, it will be necessary for us to update our privacy policy. If we do so, we will place a notice on our website.

1.4 Collection of Your Personal Information

We collect personal information from you during the course of your dealings with us. The type of information we collect is classified as ‘personal information’ under the *Privacy Act 1988* (Cth).

1.5 Note: Upon initiating contact with the Luton Franchisor you must confirm if you wish to *subscribe* to future marketing or if circumstances change, advise of your desire to *unsubscribe*.

Our Privacy Statement is displayed at all Open for Inspections and in conjunction with Tenancy Applications, acknowledging your wish to subscribe.

1.6 The information we collect will depend on the services we are providing/undertaking and may include such information as your name, residential and/or business address, contact phone numbers and email address, employment details, family details, financial information relevant to assessing suitability for a tenancy, property value, banking details, references, copies of identification and other details relevant to either providing a service to you or one of our clients. Information is generally collected via your contact with our staff. However, the Luton Franchisor also maintains a website and a social media presence. Accordingly, personal information about you may be collected via your access to those online media. For example, our website may use cookies which provide certain information regarding you. Similarly, posting on our Facebook page or a Facebook page of one of our staff may constitute collection of personal information from you.

PURPOSE OF COLLECTION

2.1 The purpose for which your personal information is collected by us is for the purpose of us providing our services. For example:

- (a) Information collected at open homes is collected for the purpose of being able to contact you with respect to the property viewed as well as other properties that we believe may interest you. In addition, such information is collected for the security of the Owner whose property is being viewed;
- (b) If you make an enquiry about a home being marketed by the Luton Franchisor, we use this information to respond to your queries about that property, contact you about other properties that may be of interest to you and to negotiate any potential sale;
- (c) If we are advertising a property for sale on your behalf, we utilise your personal information to facilitate that sale;
- (d) Information provided by a Landlord to whom we provide managing agent services is utilised for such purposes as communicating with the Landlord regarding matters pertaining to their property and ensuring rental monies are transferred to the Landlord;
- (e) Information provided by a Tenant or a prospective Tenant for a property we manage is utilised for such purposes as communicating with the Tenant in relation to the property, undertaking due diligence on a prospective Tenant.

2.2 Personal information provided to us is also utilised by us for our internal business operations, complying with our legal obligations and promoting and advertising our business and services.

2.3 Your information may also be utilised as part of assessing potential licensing proposals and management of any licensing arrangements.

2.4 We undertake certain marketing activities on behalf of ourselves as well as our other clients, your personal information may be utilised to send you marketing materials unless you opt out from receipt of such marketing (see below).

DISCLOSURE OF YOUR PERSONAL INFORMATION

3.1 The Luton Franchisor has a centralised entity which assists the Luton Franchisor businesses with the processing of transactions. Your personal information will be disclosed to that entity for the purpose of that entity assisting us with matters on your behalf. For example, processing payments to landlords and balance of deposits to owners following sale.

3.2 In addition, where we assist you in obtaining other services from third parties (for example, building inspectors or tradesmen) we may disclose your information.

3.3 Your personal information may also be utilised by the head licensing entity for the purpose of dealing with licensees.

3.4 Where required by law, we may also disclose your personal information.

DISCLOSURE TO OVERSEAS RECIPIENTS

4.1 The Luton Franchisor is an Australian based business and does not make disclosures to overseas recipients of your personal information.

CONSEQUENCES IF SOME OR ALL THE PERSONAL INFO IS NOT COLLECTED

5.1 If we do not collect the personal information or it is incomplete or inaccurate, we may be either unable to provide the relevant services or provision of those services may be compromised.

SECURITY OF YOUR PERSONAL INFORMATION

6.1 We hold your personal information in paper and electronic files. We take steps to protect your information from misuse, interference and also from unauthorised access, modification or disclosure by having in place electronic safeguards such as virus and firewall protection procedures as well as policies regarding staff access to and storage of such information.

CORRECTION OF YOUR INFORMATION

7.1 You may at any time request access to your personal information or may correct any inaccurate or out of date information. To do so, please email hr@luton.com.au.

7.2 In some circumstances, we may be required by law not to release to your information pertaining to how we came into possession of certain personal information about you. If we are unable to comply with any request you make, we will let you know why we may not so comply.

OPTING OUT OF MARKETING

8.1 If at any time you do not wish to receive any further marketing material from us or for your information to be disclosed for the purpose of direct marketing our services to you, please contact email hr@luton.com.au, so that we may remove your details from our marketing database.

COMPLAINTS

Where We have agreed with a Worker that they will perform their duties, either in whole or part, at the Worker's home, the Working from Home Policy will apply.

9.1 If you have any concerns or complaints about this privacy policy, our handling of your personal information or our compliance with the *Privacy Act* or any related codes, please contact email hr@luton.com.au at first instance.

9.2 Should we be unable to satisfactorily resolve your concern, you are also entitled to make any complaint to the Office of the Australian Information Commissioner (OAIC) at:

https://forms.business.gov.au/smartforms/landing.htm?formCode=APC_PC

HOW TO CONTACT US

10.1 In addition to contacting hr@luton.com.au. Our receptionist will be able to direct you to the most appropriate person within the relevant the Luton Franchisor entity to address any concern you may have.