

# PRIVACY POLICY

## 1. Introduction

Aria Sales Pty Ltd trading As Coupers Real Estate is a real estate service based on the Gold Coast, Australia providing commercial and residential property sales, property management and leasing services (**services**). We are committed to protecting information provided to us, or obtained by us, through our websites, services or through third parties that are associated with our business. We are bound by the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth).

This Policy outlines how we collect, use, disclose and protect personal information. It should be read together with any terms and conditions governing your use of our website and any location specific legal notice. By using our website or providing us with personal information, you consent to our collection, use and disclosure of your personal information in accordance with this Policy and any other arrangements that apply between us.

In this Policy,

- **Act** means the *Privacy Act 1988* (Cth) as amended from time to time;
- **personal information** means has the meaning given to it in the Act. In general terms, it is any information or opinion about you, from which you can be identified; and **us, we** and **our** means Coupers and our Related Bodies Corporate (as that term is defined in the *Corporations Act 2001* (Cth)).

## 2. Types of personal information collected

We only collect personal information where it is necessary for our functions or activities. The types of personal information that we collect depends upon the nature of your dealing with us and may include, but is not limited to:

- your name and contact details (e.g. email address, telephone number, residential address);
- if you are entering into a contract, lease or other transaction, or if you are applying for a career with us – we may collect information to identify you (e.g. date of birth, government identification), your previous addresses, your employment and financial details (e.g. profession, position held, bank account and payment information);
- household details (e.g. number of people living at a household and their ages);
- records of your communications and interactions with us;
- details/history of purchases, preferences, interests and behaviour relating to the nature of our business;
- details of visits made to our website (e.g. the volume of traffic received, the internet protocol (IP) address and location of the device connecting to the site);
- publicly available information (e.g. information that we may find online from publicly available sources); or
- any other personal information that may be required in order to facilitate your dealings with us.

We may also collect data that does not personally identify you, or anyone else, such as anonymous survey responses or aggregated information about how users navigate our website.

### **3. How personal information is collected from you**

Usually, we will collect personal information directly from you, but from time to time we may collect it indirectly via a third party associated with our business. We may collect personal information from you when you:

- contact us (online, by phone, email, or on social media), provide your personal information to us or request information or services from us;
- express interest in our services;
- complete an enquiry form on our website;
- attend an open home or property inspection, or other event hosted by us;
- visit our website or mobile app, or that of an associated party;
- have previously provided personal information to a third party (including another agency), and by an individual or entity becoming associated with us, your personal information is provided to us
- participate in a promotion, competition or survey; or
- post a review/comment on our Google My Business, website or social media page.

We may also collect personal information from third parties, with whom you have dealings, such as:

- agencies, associated parties or online platforms such as realestate.com.au through which you have submitted an enquiry or completed a form;
- credit, law enforcement or government agencies;
- your employer;
- your representatives (accountants, solicitors, advisers etc.)

In addition, when you apply for a career or other position with us we may collect certain information from you (including your name, contact details, working history and relevant records checks) from any recruitment consultant, your previous employers and others who may be able to provide information to us to assist in our decision on whether or not to make you an offer of employment or engage you under a contract. This Policy does not apply to acts and practices in relation to employee records of our current and former employees, which are exempt from the Act.

### **4. Use of your information**

We collect, hold, use and disclose your personal information for the purpose of providing our services, administering our business activities, improving our service offering, and personalising our customer experience, along with other purposes required by law or that you have consented to.

These purposes can include:

- to provide services or information to you, as requested by you;
- to answer your enquiries or respond to complaints (submitted online or by email or phone);

- to identify services or property or other promotions that may be of interest to you, and notify you about them;
- to operate, protect, improve and optimise our website, business and our users' experience, such as to perform analytics, conduct research and for advertising and marketing;
- to conduct business functions where third parties require access to information (contractors or other service providers such as a marketing agency);
- to adequately maintain records required by us and our associated third parties (contractors, property agents etc);
- where an individual or entity severs their relationship with us (i.e. an agent) and is entitled to export their database (which may contain your personal information);
- to comply with our legal obligations and enforce our agreements with third parties; or
- to consider your employment application.

While you may be able to interact with us anonymously in some instances, in most cases if we are unable to obtain your personal information, we may not be able to adequately carry out our business functions and provide services requested by you.

## **5. Disclosure of your information**

Your personal information will not be disclosed other than as outlined in this Policy, with your consent or where we are authorised or required by law.

We work with a number of associated parties that assist with the functioning of our business. We may disclose your information to such parties for the purpose of operating our business or to satisfy your requests. These parties may include, but are not limited to:

- technology services: IT administrators, technical support, data entry and web hosting service providers, cloud service providers, and payment and debt collectors;
- communication, marketing and advertising providers;
- administrative services: courier and mailing service providers and utility providers;
- professional services: accountants, solicitors, business advisors, analysts and other consultants, contractors, real estate agents and franchisees;
- our related bodies corporate within Australia;
- anyone to whom our assets or businesses (or any part of them) are transferred;
- specific third parties authorised by you to receive information held by us; and/or
- other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

We may also disclose your personal information to a trusted third party who also holds other information about you. This third party may combine that information in order to enable it and us to develop anonymised consumer insights so that we can better understand your preferences and interests, personalise your experience and enhance the information and services that you receive.

## **6. Disclosure overseas**

Some data storage providers, IT service providers and other third-party service providers may be located overseas. We may disclose your personal information to such entities, located outside of Australia, and take reasonable steps to ensure that these providers adequately protect your personal information in a way that is consistent with the Act.

## **7. Direct marketing**

We and/or our carefully selected business partners may send you direct marketing communications and information about our services and properties you may be interested in. This may take the form of emails, SMS, mail, phone, or other forms of communication, in accordance with the Act.

You may opt-out of receiving marketing materials from us by contacting us at [sales@coupers.com.au](mailto:sales@coupers.com.au) or by using the opt-out facilities provided in any email or SMS from us (eg an unsubscribe link).

We may occasionally engage other companies to provide marketing or advertising services on our behalf. Those companies will be permitted to obtain only the personal information they need to deliver the service. If we provide those companies with any of your personal information, it is to provide you with a better or more relevant and personalised experience and to improve the quality of those services.

## **8. Security**

We retain your personal information both electronically and in hard copy form within our office/s and through the service providers that we utilise. We take reasonable steps to ensure the protection of your personal information against any unauthorised use including:

- company security standards, policies and procedures;
- our data storage providers must comply with appropriate security standards;
- restricted on-premise access to databases/hard-copy personal information;
- password controlled access to databases;
- employees and associated parties are contractually obligated to protect personal information and adhere to security standards, policies and procedures; and
- reasonable measures to de-identify or securely destroy personal information that is no longer needed.

Whilst we undertake reasonable actions to protect your personal information, the internet is inherently insecure. Therefore, we cannot guarantee the security of personal information transmitted through our website. Any personal information you transmit online is done so at your own risk.

## **9. Cookies**

When using our website, we may send “cookies” to your device. A cookie is a piece of information that identifies your device (using a unique ID number) and allows us to interact with it. It enables us to track

your activity on our website for a period of time and provides the ability to measure traffic, patterns of use and user-habits on our website. This information is used to improve our website/online services and our overall user experience. The types of information we collect may include, IP address, location data, dates and times, and links clicked.

If you would like to disable cookies, you can change the preferences on your browser to reject them.

## **10. Third party sites**

Our website may contain links to websites operated by third parties. Those links are provided for convenience and may not be maintained. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ substantially from this Policy, so we encourage individuals to read them before using those websites.

## **11. Accessing information we hold about you**

Personal information that we hold should be up to date. If you think your information is inaccurate or has become out of date, or should you wish to obtain a copy of the personal information we hold about you, please contact us in writing using the details below.

We may need to verify your identity before actioning your request. Where permitted under the Act, we may decline your request and if so, we will provide you with a written response explaining the reason/s for our refusal.

## **12. Making a complaint**

If you have a concern or complaint regarding this Policy or the use of your personal information, please contact us using our details below. We will investigate the complaint and provide a response as soon as reasonably practicable.

If you think that we have failed to resolve the complaint satisfactorily, we will provide you with information about the further steps you can take.

You may also submit a complaint to the Office of the Australian Commissioner (**OAIC**) at:

GPO Box 5218 Sydney NSW 2001

Telephone: [1300 363 992](tel:1300363992)

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

Website: [www.oaic.gov.au](http://www.oaic.gov.au)

### **13. Status of this policy**

We regularly review and may make changes to this Policy and reserve the right to do so. Updated versions of this Policy will be displayed on our website.

### **14. Contact and further information**

For further information about this Policy or our privacy practices, or to access or correct your personal information, or to make a complaint, please contact us using the details set out below:

Attention: Legal and Compliance

Email: [sales@coupers.com.au](mailto:sales@coupers.com.au)

Post: [PO Box 1605](#)

[Broadbeach QLD 4218](#)

Telephone: [0755920687](tel:0755920687)

*This Policy was last updated December 2023.*