

## Blue Square Property Privacy Policy

### 1. Privacy Statement

This privacy policy describes how Blue Square Property (VIC) Pty Ltd (ABN: 45 588 440 382) (Blue Square Property) and agents (collectively, we, our, us) will collect and handle your personal information.

#### B. Summary of our approach to managing your personal information

If you provide us with your details, Blue Square Property may contact you about our property listings and related products and services.

We may use your personal information within Blue Square Property and disclose it to our authorised representatives and service providers who act on our behalf, to fulfil the purpose for collecting your information. Our service providers may have servers located overseas such as in USA, Europe, India, Philippines and Japan. Without your information, we may not be able to provide you with services and you may miss out on receiving valuable information from us. We do not collect sensitive information about you unless you provide it to us voluntarily. You have a right to access your personal information that we hold and may ask us to correct this. Our Privacy Policy below contains more detail on your rights and contact details for questions or complaints.

Last Updated: August 2026

## 2. Privacy Policy

### 1) Introduction

We respect the importance of protecting your privacy. We handle your personal information in accordance with our obligations under the Privacy Act 1988 (Cth) (Privacy Act), including the Australian Privacy Principles (APPs).

#### A. About this Privacy Policy

This Privacy Policy describes how Blue Square Property collect, handle, use and disclose your personal information.

"You" and "your" refers to any individual about whom we collect personal information.

By providing us with your personal information, you consent to us using and disclosing it for the purposes set out in this Privacy Policy.

We will update this Privacy Policy when our information handling practices change, or when required, with or without notice to you. However, where we make material changes to this Privacy Policy, we will provide notice to you (including by updating our website).

Any revised Privacy Policy will take effect when it is published on our website. You can also obtain a copy of our Privacy Policy by contacting us and requesting a copy.

Other terms and conditions may apply to you such as:

- the privacy terms and conditions contained in our website terms and conditions (as applicable to you); and
- the privacy collection notices which may be provided to you at the time your personal information is collected by Blue Square Property.

### 2) Our functions and activities

We collect, hold, use and disclose your personal information so that we can perform our functions and activities and provide the best possible customer service. Our collection, use and disclosure of your personal information will depend on our relationship with you, the circumstances of collection and the type of products and services you request from us.

We may collect, hold, use and disclose your personal information for the following purposes:

- To provide and administer our products and services, including to market properties for vendors and landlords,
- facilitate transactions for sales and leasing, provide property

- concierge services, verify your identity, and process payments if applicable;
- To respond to your submissions and enquiries about our products and services and property listings;
- To provide customer support, including conducting, investigating and responding to enquiries, surveys, feedback, comments and complaints;
- To distribute our newsletters and other communications either alone or with the
- assistance of service providers on information about us, our property listings and our related products and services;
- To inform and conduct marketing activities including to promote our products and services;
- To conduct research about your interests and attitudes towards our products and services to improve our products and services, marketing activities and customer experience;
- To manage and carry out our business and operational functions, including HR management, business decisions
- and assessing your suitability as an employee, contractor, agent or broker;
- To maintain records and comply with our legal obligations;
- To meet our obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), the Anti-Money Laundering and Counter-Terrorism Financing Rules and related legal and regulatory obligations (AML/CTF Laws), including to identify and verify customers and other relevant persons, understand the nature and purpose of real estate transactions, assess and manage money laundering, terrorism financing and proliferation financing risks, conduct sanctions and politically exposed person screening, monitor transactions where required, keep required records and make reports to AUSTRAC or other authorities where required or permitted by law;
- To facilitate or implement a transfer or sale of all or part of our assets or business or if we undergo any other kind
- of corporate restructure, acquisition or sale; and

### 3) What is personal information?

Personal information is defined in the Privacy Act, and means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.

In this Privacy Policy, whenever we use the term “personal information”, we are referring to this legal definition.

Personal information does not include:

- aggregated or de-identified data;
- information about the specifications of a property; or
- if you are a contractor or real estate agent, business information that does not identify a person or reasonably identify you (i.e. in certain circumstances, your business payment details).

In some circumstances, you may be able to interact with us, including online via our website and social media, without identifying yourself.

### 4) What information do we collect and how do we collect it?

We collect personal information that is reasonably necessary for us to perform our functions and activities. Normally, we collect your personal information from you directly, however, there may be occasions when we may collect information about you from other people or organisations (for example service providers). We have set below a summary of the types of personal information we may collect from you and how we may collect this information.

#### Personal and contact details

This may include your:

- name;
- address;
- postcode;
- email address; and
- telephone number.

We may collect this information directly from you in person or online via phone, email, social media, our websites, or other applications (which, in some circumstances, may use artificial intelligence):

- when you contact us to make an enquiry or request us to provide our products and services or information about our products and services, including sales, and leasing; when you contact us to provide feedback, comments or suggestions on our functions and activities or complete one of our surveys;
- when you subscribe to communications from us such as updates, publications or newsletters (including to receive rental or property inspections, availability or news);
- when you otherwise interact with us or disclose your personal information to us.

## Open home, auction, inspection and attendance information

This may include:

- personal and contact details (as above); inspection registrations,
- attendance logs,
- your feedback and opinions on a property; and
- your communication preferences.

We may collect this information directly from you:

- in person, either manually (in writing) or via digital tools when you attend property inspections at one of our listed rental or for-sale properties or visit our offices, including via manual in-person sign-in and security surveillance of our offices; or
- when you contact us to make an enquiry or application about our listed properties, including online (including via social media or through our third party providers), over the phone or in person.

We may also collect this information indirectly from third parties, including from:

- service providers that assist us with scheduling property inspections, such as Domain, Realestate.com.au and other similar providers;
- from someone that you have authorised to attend a property inspection on your behalf (for example, a family member, friend or buyer's agent who may provide us with your information); and

## Property management and tenancy information (where applicable)

This may include:

- rental applications and supporting information, including rental and employment history;
- tenancy details and inspection reports;
- maintenance requests and communications; payment and
- arrears-related correspondence; and landlord instructions and
- record.

We may collect this information when:

- you apply for a rental property,
- enter into a tenancy,
- communicate with us as a tenant or landlord,
- request or approve maintenance,
- attend or participate in routine inspections, or
- otherwise interact with us in connection with property management services.

We may also collect this information indirectly from third parties, including your nominated referee or employer when you apply to rent a property with us.

We may also use third party service providers to collect this information on our behalf to assist us in managing your tenancy.

We adopt a staged approach to collecting tenancy application information, which means that we only collect personal information that is reasonably necessary for the relevant stage of the tenancy process. If you become a preferred or conditionally approved tenant, we may require further information to verify your identity, finalise the tenancy and satisfy any insurer screening requirements. For further information, please see our separate tenancy application privacy collection notice that will be provided to you at the time of your application.

## Property and transaction information This may include:

- property addresses,
- inspection enquiries,
- appraisals, offers, sale or lease details, contract
- information; and
- settlement milestones.

We may collect this information when:

- you enquire about, inspect, offer on, buy, sell, lease or manage a property;
- request an appraisal;
- negotiate or enter into an agency agreement, authority or contract; or
- communicate with us about a property transaction.

## Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) information

This may include:

- information used to verify your identity, including your full name, date of birth and residential address;
- document numbers or other limited information from identity documents where required or permitted by law;
- information about persons acting on your behalf and their authority to act;
- information about companies, trusts, partnerships, self-managed superannuation funds
- or other entities involved in a transaction, including directors, trustees, beneficiaries, shareholders, beneficial owners and persons who own or control the entity;
- information about the nature and purpose of a sale, purchase or transfer of real estate; source of funds or source of wealth information and supporting documents where required on a risk basis;
- politically exposed person, sanctions, adverse media and risk assessment information; transaction, payment, settlement and trust account information relevant to a real estate transaction; and
- records of customer due diligence, ongoing monitoring, escalations, decisions and reports required under AML/CTF laws.

We may collect this information directly from you when we provide, or are asked to provide, services connected with the sale, purchase or transfer of real estate, or when we are otherwise required to complete customer due diligence or related AML/CTF checks under AML/CTF Laws.

We may also collect this information indirectly from your authorised representative, through our service providers that support identity verification and AML/CTF compliance and from reliable and independent sources, public registers, government or regulatory sources, financial institutions, legal or professional advisers, other parties to a transaction, Franchisees and real estate agents, where permitted or required by law.

We collect this information to comply with our obligations under the AML/CTF Laws. AML/CTF checks and customer due diligence are completed on relevant parties to a designated service

(such as vendors and successful purchasers) and are not conducted on all prospective buyers, attendees at open homes or persons who request to inspect a property.

## Finance and insurance referral information

This may include:

- personal and contact details (as above);
- property and transaction information (as above);
- information about your interest in obtaining finance or insurance products; and details required to
- facilitate a referral or introduction to a home loan or insurance provider.

We may collect this information when you request or consent to a referral or introduction to a home loan, mortgage broker, lender or insurance provider. This information may be collected during the course of a property transaction, when making an enquiry with us, or when you express an interest in obtaining finance or insurance products associated with a property purchase, sale or lease.

## Online and digital services information (including behavioural information) This may include:

- network and device information (such as IP address and details of your device),
- URL information,
- other activity data such as pages visited, content viewed, session duration, and
- your other online interactions with our services

We may collect this information indirectly when you use our online services via the use of online technologies, such as cookies, third party tracking pixels, tracking technologies and session tokens.

For more information about how we use online technologies, please see Section 5.

## Call recording / CCTV information

We may collect call recordings and CCTV footage.

We may collect call recording information from calls that you make to us, noting that you will always be advised of the call recording in advance if applicable.

We may collect CCTV footage of you from CCTV surveillance systems that monitor our properties and premises, including our corporate offices, when you enter such locations. CCTV may be used for security, safety, incident management and related operational purposes.

## Information required to be collected by law

We may collect this information directly from you as permitted or required by law.

#### Publicly available information

This includes personal information which is publicly available online, such as information contained in:

- publicly accessible social media profiles,
- professional networking platforms,
- business websites, property marketing websites,
- publicly available ASIC records,
- professional licensing registers, and
- other publicly available databases.

We may collect this information through online platforms and services, online forums, social media channels and websites.

This includes platforms such as Facebook, LinkedIn and Google. Users of these platforms and services may elect to send information to us from these platforms. We use this information strictly in accordance with the terms imposed by that platform, this Policy and the purposes for which the information was collected.

#### Unsolicited information

Unsolicited personal information is personal information we receive that we have taken no active steps to collect (for example, an employment application sent to us by an individual on their own initiative, rather than in response to a job advertisement).

We may collect this information directly from you when you contact us.

We may keep records of unsolicited personal information to the extent that it is permitted by the Privacy Act (for example, if the information is reasonably necessary for one or more of our functions or activities).

If not, we will destroy and de-identify the information as soon as practicable, provided it is lawful and reasonable to do so.

#### 4) What happens if you don't provide your personal information?

You don't have to give us all the information we request. However, if you do not provide us with some or all of the personal information required, we may not be able to perform our functions or activities.

For example:

- we may not be able to provide you with the products and services or information you request, to the requested standard or at all; and
- you may also miss out on receiving valuable information about us and our products and services.
- we may not be able to commence, continue or complete certain services connected with a real estate transaction, including listing, marketing, brokering, negotiating, exchanging or progressing a sale, purchase or transfer, until required AML/CTF customer due diligence has been completed.

#### 5) Cookies and other analytics tools: how we use them

We may use cookies and online behavioural tracking tools, such as web beacons, pixels, device identifiers and web server logs, to collect, store and monitor visitor traffic information and actions on our website.

We may use and combine information collected via cookies and other third party tracking technologies to maintain, secure and improve our websites, enhance your experience when using our websites, display and deliver relevant content, services and advertising and understand the effectiveness of our marketing and advertising (including direct marketing and online ads on external websites).

We may also collect analytical and behavioural information through cookies, pixels, web beacons, device identifiers and web server logs, including IP addresses, geolocation data, browsing behaviour, website interactions and engagement metrics.

We may use this information to better understand customer interests and preferences, improve our products and services, measure and optimise the effectiveness of our marketing and communications, segment audiences and provide more relevant information regarding property, recruitment, franchise and other business opportunities where permitted by law and in accordance with your marketing preferences.

#### Cookies

Cookies are small data files which are placed on your computer that allow our websites to "remember you" when you return to our websites. These cookies and tools are not used to record any personal information.

#### 6) Who may we disclose personal information to?

Blue Square Property may disclose your personal information to our employees, agents, brokers and contractors.

We may also disclose your personal information as part of our functions and activities to the following recipients:

##### Transactional recipients

To facilitate transactions with the other parties in any real estate transaction including developers, vendors, landlords, purchasers and tenants, and their authorised representative.

##### Guarantors, other mortgage intermediaries, lenders, financial institutions, insurers, valuers and credit reporting bodies and providers

To facilitate property transactions, arrange or assess finance, insurance or guarantees, obtain valuations, verify identity or financial capacity, manage risk, comply with legal or regulatory obligations, or otherwise support the provision of our real estate services.

##### Suppliers and service providers

To assist us to perform our functions and activities such as AML/CTF verification, recruitment and HR.

##### Debt collectors and utility companies

To manage or recover outstanding amounts, arrange or transfer utility services, connect, disconnect or change accounts, confirm occupancy details, or otherwise administer tenancy or property-related services.

##### Government and law enforcement agencies

To comply with our legislative and regulatory obligations, including AML/CTF Laws, sanctions, fraud prevention, identity verification, reporting, record-keeping and other legal or regulatory obligations (for example, AUSTRAC, financial crime regulators, and other authorities).

##### Authorised representatives

To facilitate property transactions, arrange finance or related services, or otherwise support you in connection with our real estate services (for example, lawyers, mortgage brokers, accountants and financial advisors).

##### People or entities in connection with a corporate restructure or a potential corporate structure

To facilitate or implement a transfer or sale of all or part of our assets or business, or if we undergo any kind of corporate restructure or any potential corporate restructure. In this context, your personal information may be transferred to another entity.

##### Referees

To validate details you have provided us with, including your rental history, resume, qualifications, experience, training or abilities with your nominated referees.

#### 7) Do we disclose personal information overseas?

Yes. It is likely that your personal information will be transferred outside of Australia.

Some of the service providers we use to provide our services may have servers located overseas in various countries, including but not limited to USA, Europe, India, Japan and Philippines. These service providers handle, process or store your personal information on our behalf.

We will only share your personal information outside of Australia where we are permitted to do so under the Privacy Act.

This means that we will generally take reasonable steps to ensure that any such overseas recipients do not hold, use or disclose your personal information in a way that is inconsistent with the obligations imposed under the Privacy Act and the Australian Privacy Principles in the Privacy Act.

#### 8) Direct marketing and how to opt-out

Blue Square Property and our third party service providers may, from time to time, send direct marketing communications to you about our products and services, our property listings and other material that we consider you would find interesting or useful.

These communications may be sent in various forms, including by telephone, email, SMS, social media (targeted advertisements on certain websites, mobile applications and social media channels) or any other form of electronic communication, in accordance with the Privacy Act (including APP 7) and the Spam Act 2003 (Cth).

If you do not wish to receive such direct marketing communications, you can opt out at any time using the methods described below.

#### Direct marketing via email or SMS

You can opt-out by following the unsubscribe instructions in the relevant communication (such as email or SMS message).

#### Cookies or other third party tracking technologies

You can only opt-out of these types of cookies and tracking technologies by adjusting your device settings and online privacy settings (for advertising on certain websites, mobile applications and social media channels). However, opting out of certain cookies might mean your access to parts of our website is limited, or you may experience reduced functionality when accessing certain website functions.

Importantly,

- if you choose to opt out of all direct marketing communications, please note that Blue Square Property may still contact you for other reasonable purposes, including information that Blue Square Property is legally required to send, notifications of changes to Blue Square Property products and services or policies and information regarding the use, rights, benefits or obligations of customers of our products and services; and

#### 9) How do we hold and secure personal information?

Blue Square Property takes reasonable technical and organisational measures to ensure that the personal information it holds is protected from misuse, interference and loss, and from unauthorised access, modification or disclosure, in accordance with applicable privacy laws.

We hold your personal information both electronically, on our own servers and those of our service providers.

#### Electronic records

Your personal information will be stored on databases held on servers located in a technologically secured environment, accessed only by authorised personnel or contractors (with login and password protection).

We may also maintain physical security measures in relation to storage of our electronic records (such as locks and security systems), and maintain computer and network security, by using firewalls, anti-virus software and other security systems to control access to our computer systems.

We will only keep your personal information we store for as long as is necessary for the purposes set out in this Privacy Policy, or as required to comply with any applicable legal obligations.

Where we collect personal information for AML/CTF purposes, we are required to keep AML/CTF records for a minimum of seven years after the end of the relevant transaction or business relationship, or such longer period as required by law. Access to AML/CTF records is restricted to authorised personnel and service providers who require access for compliance purposes. At the end of the required retention period, we will take reasonable steps to securely destroy or de-identify the information unless it must be retained for a longer period under another Australian law, regulatory requirement or court order.

When we no longer require personal information (and in accordance with any applicable laws), we will take steps to delete, destroy or de-identify that information.

#### 10) How to correct and access your personal information

It is important to us that the information we hold about you is up-to-date, accurate and complete, and we will try to confirm your details through our communications with you and promptly add updated or new personal information to existing records when we are advised. If any of your details change, please notify us as soon as you can. If you believe we are holding information about you that is inaccurate, incomplete, irrelevant or misleading, you can ask us to correct it or delete it altogether.

If you would like to access your personal information, or ask us to update, correct or delete it, you can do so by contacting us in writing and verifying your identity. We will do our best to respond to your request within 30 days.

We will only refuse access in exceptional circumstances, and if this is the case, we will advise you of our reasons for doing so in writing.

If you are dissatisfied with Blue Square Property's refusal to grant access to, or correct, your personal information, you may complain to us using the contact details at Section 13 below.

We may charge a fee for searching for, and providing access to, your information on a per request basis.

#### 12) Privacy complaints and further information

We take your complaints seriously and will attempt to resolve your issue quickly and fairly.

If you believe that Blue Square Property has breached the APPs, or you have a complaint about how we handle your personal information as set out below:

- You may make a complaint addressed to the Blue Square Property Privacy Officer using the contact details provided at Section 13. The complaint must identify you and be in writing.
- We will consider whether there are simple or immediate steps which can be taken to resolve the complaint. We will generally acknowledge your complaint within a week.
- If your complaint requires more detailed consideration or investigation, we may ask you to provide further information about your complaint and the outcome you are seeking.
- We will then typically gather relevant facts, locate and review relevant documents and speak with the individuals involved.
- We will investigate your complaint and will endeavour to provide a response setting out Blue Square Property's decision in writing within 30 days of receipt of your complaint.
- In most cases, we will respond to your complaint within 30 days from when we receive your complaint. If the matter is more complex or our investigation may take longer, we will let you know.

If we are unable to satisfactorily resolve your concerns, or if you believe that we have breached the APPs, you are entitled to make a complaint to the Office of the Australian Information Commissioner by telephone on 1300 363 992 or on their website [www.oaic.gov.au](http://www.oaic.gov.au).

### 13) Our contact details

If you require any further information or have any questions about this Privacy Policy or if you wish to access or correct your personal information or make a complaint about our handling of that information, please contact the Blue Square Property Privacy Officer as follows:

Email: [admin@bluesquareproperty.com.au](mailto:admin@bluesquareproperty.com.au)

Tel : (03) 9578 8440

Post:

The Privacy Officer

Blue Square Property

557 North Road, Ormond VIC 3204

We welcome any feedback regarding this.