

PRIVACY POLICY

Protecting your privacy is important to us

1. Who We Are

The Real Estate Institute of South Australia Limited (**REISA**) is the peak professional body representing more than 2000 real estate professionals in South Australia (our registered **Members**). Since its foundation in 1919, REISA has been the authority in the property industry in South Australia, providing valued representation and services to Members and advancing the standing and professionalism of those within the industry.

REISA is a company incorporated in Australia whose registered office is at 33 Dequetteville Terrace Kent Town, South Australia 5067 (with the Australian Business Number 82 286 272 500).

We, Us, Our and **Ours** is used in this privacy Policy to refer to REISA.

2. Your Privacy Matters

This Privacy Policy (**Policy**) provides information on how We, Our Members and any third party providers collect, use, secure, transfer and share your information.

We are committed to protecting and respecting your privacy. This Policy applies to your use of Our Website and Our apps, communications and services including off-site services such as REI Forms Live but excluding any services that indicate they are offered under a different privacy policy (**Services**).

This Policy details how We collect personal information, how We use it and who We might share it with. We are bound by the Privacy Act 1988 (**Act**) and the **Australian Privacy Principles** set out in the Act.

We may review this policy from time to time so please do check for updates. If you have any questions about this Policy, or the way We process personal information, please send an email to the Legislation and Compliance Advisor at reisa@reisa.com.au.

3. How Do We Collect Information?

We collect information from you in the following ways in order to potentially provide Services and products to you:

- through Our Websites, including forms and cookies
- email, post, fax and mail correspondence with Us
- contact via phone
- Our social media channels
- application and request forms by post
- in-person contacts with REISA employees, Members, affiliates

- information We gathered via events
- information We gathered via professional development sessions
- information obtained through the use by Our members of off-site services and
- information We receive from external third parties.

4. What Type of Information do We Collect?

We collect different types of information from you depending on Our relationship with you:

- We will collect the data We need to administer memberships, deliver advisory and professional development services and for recruitment services.
- To protect the public and to carry out Our regulatory duties effectively, We will collect information about Members and firms relating to their working practices. It may be necessary to do this without informing Members or firms in certain circumstances. This data may also be collected as part of regulatory visits.
- We will collect the information We need to provide you with the products and services you have requested from Us.
- We will collect information We need to arrange events, professional development and the administration of events. This is likely to include dietary requirements and any other pertinent information related to your requirements.
- If We receive a complaint or query from Members or members of the public, We will collect the data required to consider the complaint or query effectively.
- We also collect data to facilitate transactions in land, including via platforms such as REI Forms Live and the third party services integrated with it

We do not collect personal information (as defined by the Act) unless it is reasonably necessary for, or directly related to, one or more of the services We provide or functions We carry out. The types of personal information We generally collect includes but is not limited to the following, noting that any failure to provide this information may impact your membership to REISA and/or the services we offer to you.:

- Name.
- Date of birth.
- Residential address.
- Business address.
- Postal address.
- Email address.
- Home telephone number.
- Work telephone number.
- Mobile telephone number.
- Names of your employees.
- Your occupation and business address.
- Financial information including names of banks or financial institutions.
- Bankruptcy information and credit reporting information.
- Bank account information and credit card details
- Insurance related information including (but not limited to) professional indemnity insurance details.

We will not ordinarily ask you to provide sensitive information, however, information may fall within the definition of sensitive information under the Act. We are required to collect certain information and data on behalf of the State Government for statistical purposes in relation to professional development enrolments. This information includes information relating to:

- name
- employment status
- REISA membership status
- email address and contact details
- reason for undertaking the professional development course

Apart from the above, We will only collect sensitive information in circumstances where:

- It is reasonably necessary for one or more of the services We provide or functions We carry out; and
- You consent to the collection of the information; or
- We are required or authorised by law to collect the sensitive information.

5. How We Use your Information

In order to achieve the purposes described above, We may use your personal information (including sensitive information) through the following means or for the following purposes:

- We may use your personal information to:
 - send you marketing messages or for general marketing purposes either directly from Us or via a third party, whether or not you have bought a product or service from us.
 - maintain, review and develop our business systems, procedures and infrastructure including maintaining or upgrading our computer systems, whether by Us or through external organisations.
 - facilitate commercial negotiations with external persons or organisations our business.
 - facilitate property market research and analytics with external persons or organisations.
 - work and share with businesses which facilitate transactions in land, such as Dynamic Methods, DocuSign and others
- We may use your Membership personal information to:
 - tell you about Membership opportunities.
 - publish the results of formal disciplinary hearings in the public domain
 - administer your accounts and Membership
 - send information to you about the running of REISA
 - send reminders to you about their professional development requirements
 - to maintain the REISA Member directory
 - send practice and guidance notes to you
 - inform you or firms with other regulatory or public bodies where there is a legal basis to do so
 - inform your employers in circumstances where it will support regulatory activity, the enforcement of professional standards or the effective management of membership
 - We will share personal information with a third party if required to do so by law
 - Share with organisations involved in payments systems including financial institutions, merchants and payment organisations.
 - Share with organisations involved in providing, managing or administering products or services, including independent contractors engaged by us as trainers or to provide us with a required service or product including direct marketing and market analysis.

In addition, We may disclose your personal information to businesses which provide services to vendors, purchasers, landlords and tenants. Any such business may use your personal information for the purpose of direct marketing.

We will not disclose your personal information to government agencies, private sector organisations or any third parties unless one of the following applies:

- You have consented.
- You would reasonably expect, or you have been told, that information of that kind is usually passed to those individuals, bodies or agencies.
- It is otherwise required or authorised by law.
- It is reasonably necessary for enforcement related activities conducted by, or on behalf of, an enforcement body (eg. Police).

Personal information collected by REISA may be shared with its related companies. We will take all reasonable and practical measures to keep such information strictly confidential.

REISA may transfer your personal information to overseas countries including but not limited to the United States of America and Canada in order to perform one or more of our functions or activities. In these circumstances, We will take reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to the information.

Like many other businesses in Australia, REISA may rely on third party suppliers or contractors to provide specialised services such as Web hosting, cloud computing technology and data storage services. If personal information is provided to these suppliers and contractors in order to enable them to perform the agreed tasks, We will make every effort to ensure that the supplier or contractor handles the personal information in accordance with the Act and the Australian Privacy Principles. We will also require all suppliers and contractors to provide privacy undertakings and enter into confidentiality agreements.

There may be limited circumstances in which it is necessary for us to collect a government related identifier such as your tax file number or Centrelink reference number. We will not use or disclose your government related identifiers unless We are required or authorized to do so by law or by a court or tribunal order, or in order to fulfill our obligations to a State or Territory authority.

6. Marketing our products and services

REISA may use or disclose your personal information to let you know about products and services in which you may be interested. You can contact Us at any time if you no longer wish Us to market Our products and services to you (see the Contacting Us section for more information).

We may disclose your personal information (including sensitive information) to sponsors and supporters of the REISA and other third parties in order to facilitate direct marketing by those parties. You may contact Us at any time to request that We refrain from providing your personal information to such parties (see the Contacting Us section for more information).

7. Non personally identifiable information

We sometimes collect data that, in and itself, does not directly identify you. We may collect, use, disclose and transfer this non personally identifiable information for any purpose. For example, We or our partners may collect information about your visits to our Website, the links and advertisements that you click on and the URL that referred you to our Website. We and/or such

third parties with whom We may contract may use this information to serve you or like-minded customers with advertisements relating to other products, programs or services.

8. Hashed personal information

We may also share hashed portions of your personal information with certain strategic partners to make our business more responsive to your interests and/or those of like-minded consumers. For example, We may aggregate your email address together with the email addresses of others who use our Website or our services, and transmit the hashed data to Facebook for the purpose of creating “Custom Audiences” (where targeted ads are sent to people on Facebook who have already used our services or been to our Website) and “Lookalike Audiences” (where targeted ads are sent to people on Facebook who have similar characteristics to people on our Custom Audience list). Please let us know if you wish to opt-out of this use.

9. Analytics Information

We may use third party analytics tools to help Us measure traffic and usage trends and online behaviour. These tools collection information sent by your computer or mobile device or our Website, including the Web pages that you visit, add-ons, and other information that assist Us in improving the Website. We collect and use this analytics information with analytics information from other users so that it cannot reasonably be used to identify any particular individual user.

10. Cookies

We may use cookies on our Websites to manage the operation and performance of our sites.

This site (and all Websites which are covered by this Policy) incorporates the use of cookies. Cookies are small data text files that are placed on your computer when you visit a Website. Cookies help to make Websites work efficiently and provide Us with information about how Our Website is used.

When you visit www.reisa.com.au and other REISA Websites linked to this Policy, We may use cookies to enable Us to collect standard internet log information and visit behavioural patterns. Cookies automatically identify your browser whenever you interact with Our site. This helps Us to make Our site more responsive to your needs and to track and manage information relevant to your specific interests. In this way We can tailor our site to you, deliver a better and more personalised service and track the pages on Our site that you are interested in.

You should note that if you do not accept the cookies or subsequently choose to disable cookies, you may not be able to access all the services on Our site.

11. Web Beacons and Pixel Tags

In addition to cookies, We may also collect analytics information through the use of tracking pixels, also known as Web beacons. A tracking pixel is a transparent graphic image that is placed on a Web page and, in combination with a cookie, allows for the collection of information regarding the use of the Website that contains the tracking pixel. We may use tracking pixels to tell when an advertisement has been clicked on or otherwise interacted with, and use that information to judge which advertisement is more appealing to users. In some cases, We use third party service providers to help us collect and analyse this information.

12. Accuracy of Personal Information

REISA will take reasonable steps to ensure that all personal information it collects, uses or discloses is accurate, complete and up-to-date.

If you believe your personal information is not accurate, complete or up-to-date, please contact Us (see the Contacting Us section for more information).

13. Security

Your personal information may be stored in hard copy documents or electronically.

REISA is committed to keeping your personal information secure and safe. Some of the ways We do this are:

- Requiring employees and contractors to enter into confidentiality agreements.
- Secure hard copy document storage (i.e. storing hard copy documents in locked filing cabinets).
- Security measures for access to Our computer systems.
- Providing a discreet environment for confidential discussions.
- Access control for Our buildings.
- Security measures for Our Websites (see the Your Privacy on the Internet section for more information).
- Anti-spam, anti-virus and anti-malware software
- Secure server room with access limited to authorised personnel

We will review and update Our security measures from time to time.

In addition, We will review the personal information and sensitive information held by Us from time to time, ensuring that information which is no longer needed for a purpose for which it was initially collected is destroyed or de-identified.

14. Your Privacy on the Internet

REISA takes care to ensure that the information you provide to Us via our Website is protected. For example, our Website may have electronic security systems in place, including the use of firewalls and data encryption in relation to shopping cart functions.

You may be able to access external Websites by clicking on links We have provided. Those other Websites are not subject to our privacy standards, policies and procedures. You will need to contact or review those Websites directly to ascertain their privacy standards, policies and procedures.

15. Access to Personal Information

You may request access to personal information that REISA holds about you (see the Contacting Us section for more information).

We will acknowledge your request within 14 business days of the request being made. Access will usually be granted within 14 business days of Our acknowledgment or, if the request involves complex considerations or voluminous photocopying or scanning, We will contact you to provide an alternative timeframe based on the circumstances and anticipated work involved.

You will need to verify your identity before access to your personal information is granted.

While We cannot and do not charge an “application fee” for you applying to access your personal information, We may charge a fee for actually giving you access to your personal information in your preferred format (where reasonable and possible), which will cover Our costs involved in locating and collating information as Well as reproduction costs.

Once your request has been processed by REISA, you may be forwarded the information by mail or email or you may personally inspect it at the location where the information is held or another appropriate place. Whenever possible, We will endeavour to make the information available to you in the manner requested by you unless it is unreasonable for Us to do so (eg. if you have asked for the information to be emailed to you, We will endeavour to email the information to you. If the file size would be too large, We may send you the information by hard copy instead of email).

If you are aware that We hold personal information about you that is no longer accurate, complete or up-to-date, please contact Us (see the Contacting Us section for more information).

If you request access to your personal information, or if you request that We correct your personal information, We will allow access or make the correction unless We consider that there is a sound reason to withhold the information, or not make the correction.

Under the Act, We may refuse to grant access to personal information if:

- We believe that granting access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety.
- Granting access would have an unreasonable impact upon the privacy of other individuals.
- Denial of access is required or authorised by law or by a Court or Tribunal order.
- Giving access would be unlawful.
- The request for access is frivolous or vexatious.
- Legal proceedings are underway or anticipated and the information would not be accessible by way of the discovery process in those proceedings.
- Giving access would reveal Our intentions in relation to negotiations between us and you in such a way as to prejudice those negotiations.
- Giving access is likely to prejudice enforcement related activities conducted by, or on behalf of, an enforcement body.
- Giving access is likely to prejudice action being taken or to be taken with respect to suspected unlawful activity or serious misconduct relating to Our functions or activities.
- Giving access would reveal information in connection with a commercially sensitive decision making process.

If We do not agree to make a correction to your personal information, you may provide a statement about the requested corrections, and We will ensure that the statement is apparent to any users of the relevant personal information.

If We do not agree to provide access to your personal information or to correct your personal information, We will provide written reasons for the refusal and the mechanisms available to complain about the refusal (see the Complaints section for more information).

16. Contacting us

You may contact us by mail, email or telephone as follows:

REISA Legislation and Compliance Adviser either by post at 33 Dequetteville Terrace, Kent Town, by telephone on 8366 4300 or by email at reisa@reisa.com.au

17. Complaints

If you consider that there has been a breach of the Australian Privacy Principles, you are entitled to complain to Us (see the Contacting Us section for more information). We will acknowledge receipt of a complaint within 2 business days. We will investigate the complaint and attempt to resolve it within 20 business days after the complaint was received. Where it is anticipated that this time frame is not achievable, We will contact you to provide an estimate of how long it will take to investigate and respond to the complaint.

If you consider that We have not adequately dealt with a complaint, you may complain to the Office of the Australian Information Commissioner on the below details:

Mail:

Officer of the Australian Information Commissioner (OAIC)
GPO Box 5218
SYDNEY NSW 2001

Email:

enquiries@oaic.gov.au

Phone:

1300 363 992

18. Privacy Policy Updates

We reserve the right to change this Policy at any time and any amended Policy is effective upon posting to our Website. We will make every effort to communicate any significant changes to you via email or via our updates. Your continued membership of REISA and use of our services will be deemed acceptance of any amended Policy.

Last updated on 11 August 2021