DOWLING
PROPERTY

Privacy Package

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ABN 29 101 237 281

Privacy Package

Dowling Real Estate (Raymond Terrace) Pty Ltd

Purpose

Dowling Property is committed to protecting the privacy of individuals and managing personal information in an open, transparent and secure manner.

This Privacy Package has been developed to provide a comprehensive framework for the collection, use, disclosure, storage, retention and destruction of personal information handled by Dowling Property in the course of conducting its real estate business.

The Privacy Package has been prepared having regard to the:

- Privacy Act 1988 (Cth);
- Australian Privacy Principles (APPs);
- Office of the Australian Information Commissioner (OAIC) guidance;
- current privacy guidance and templates published by the Real Estate Institute of New South Wales (REINSW); and
- where applicable, the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) (AML/CTF Act).

This package demonstrates our commitment to implementing appropriate privacy governance, maintaining effective information security practices, responding appropriately to privacy incidents, and ensuring personal information is managed responsibly throughout its lifecycle.

Where Dowling Property is required to comply with obligations under the AML/CTF Act, personal information collected for those purposes will be managed in accordance with applicable privacy obligations and the Australian Privacy Principles.

Contents of this Privacy Package

This Privacy Package contains the policies, procedures and supporting documents adopted by Dowling Property to support compliance with the Privacy Act 1988 (Cth), the Australian Privacy Principles and current REINSW privacy guidance.

The documents contained within this Privacy Package are intended to work together as an integrated privacy management framework.

The Privacy Package includes:

1. General Website Privacy Policy
2. Privacy Policy & Collection Notice
3. Internal Privacy Compliance Plan
4. Personal Information Request for Access / Request for Correction Form
5. Data Breach Response Plan
6. Data Retention & Destruction Policy
7. Cross-Border Privacy Policy
8. De-Identification of Information Policy

1. General Website Privacy Policy

Scope

This General Website Privacy Policy explains how Dowling Property collects, holds, uses and protects personal information obtained through its website and associated online services.

This policy applies only to personal information collected through Dowling Property's website, online enquiry forms, digital communications and related online technologies.

We recognise that individuals who visit our website expect their personal information to be handled responsibly. We are committed to maintaining reasonable administrative, technical and physical safeguards to protect personal information collected online from misuse, interference, loss, unauthorised access, modification or disclosure.

This policy has been prepared having regard to the Privacy Act 1988 (Cth), the Australian Privacy Principles and current REINSW privacy guidance. Where Dowling Property is required to comply with obligations under the AML/CTF Act, personal information collected through the website that relates to those obligations will be handled consistently with applicable privacy requirements.

Information We Collect Through Our Website

Depending upon how individuals interact with our website, Dowling Property may collect personal information including:

Contact Information

- Full name
- Email address
- Telephone number
- Residential or postal address (where voluntarily provided)

Property Enquiry Information

- Property enquiries
- Sales enquiries
- Rental enquiries
- Inspection requests
- Maintenance enquiries
- General correspondence submitted through website forms

Technical Information

When individuals visit our website, certain technical information may be collected automatically, including:

- IP address
- Browser type and version
- Device identifiers
- Operating system
- Date and time of access
- Pages visited
- Referring website
- Session information
- Cookie identifiers
- Website usage analytics

This information assists us in improving website functionality, maintaining website security and understanding how visitors use our online services.

2. Privacy Policy & Collection Notice

Purpose

Dowling Property is committed to protecting the privacy of individuals and ensuring that personal information is collected, held, used, disclosed and managed responsibly and in accordance with applicable privacy laws.

This Privacy Policy & Collection Notice explains how Dowling Real Estate (Raymond Terrace) Pty Ltd ABN 29 101 237 281 trading as Dowling Property ("Dowling Property", "we", "our" or "us") manages personal information in connection with the delivery of our real estate services.

What is Personal Information?

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in material form.

Sensitive information includes information relating to health, biometric information, racial or ethnic origin, religious beliefs, political opinions, membership of professional associations, criminal history and other information defined under the Privacy Act.

Dowling Property will only collect sensitive information where:

- the individual has provided consent;
- collection is required or authorised by law;
- collection is reasonably necessary for the performance of our functions and activities and permitted under the Privacy Act; or
- another exception under the Privacy Act applies.

What Personal Information We Collect

Depending upon the services being provided, Dowling Property may collect personal information including:

Identity Information

- Full name
- Previous names
- Date of birth
- Signature
- Photographic identification

Contact Information

- Residential address
- Postal address
- Email address
- Telephone numbers

Property Information

- Property ownership details
- Rental history
- Inspection attendance
- Sales transaction information
- Vendor details
- Purchaser details
- Property preferences

Financial Information

- Bank account details
- Trust account information
- Rental payment history
- Bond information
- Financial capacity information where reasonably necessary

Employment Information

- Employer details
- Employment history
- Income verification
- Employment references

Credit Information

Where permitted by law, Dowling Property may collect and handle credit-related information in accordance with the Privacy Act and applicable credit reporting legislation.

Government-related Identifiers

Government-related identifiers will only be collected where authorised or required by law. We will not adopt a government-related identifier as its own identifier of an individual and will manage such identifiers in accordance with Australian Privacy Principle 9.
Information Collected for AML/CTF Purposes

Where Dowling Property is required to comply with obligations under the AML/CTF Act, we may collect additional personal information reasonably necessary to meet those obligations.

This may include:

- customer due diligence information
- identity verification information
- beneficial ownership information
- politically exposed person (PEP) information where required
- sanctions screening information where required
- ongoing customer monitoring information
- transaction information required by law
- information necessary to prevent money laundering and terrorism financing.

Dowling Property will only collect information that is reasonably necessary and authorised or required by law.

How We Collect Personal Information

Whenever reasonably practicable, we collect personal information directly from the individual concerned.

Information may be collected when individuals:

- submit tenancy applications
- enquire about buying, selling or leasing property
- attend inspections or open homes
- enter into agency agreements
- complete forms
- communicate by telephone or email
- use our website
- subscribe to marketing communications
- provide identification documents
- make payments
- lodge maintenance requests

Where appropriate, personal information may also be collected from:

- landlords
- tenants
- purchasers
- vendors
- employers
- previous managing agents
- government agencies
- publicly available registers
- legal representatives
- financial institutions
- insurance providers
- credit reporting bodies where authorised
- other persons authorised by law

Dowling Property Systems

Dowling Property uses a range of secure electronic systems to collect, store and manage personal information as part of its day-to-day real estate operations. These systems support the delivery of property management, residential sales, inspections, customer communications and regulatory compliance.

The primary systems used by Dowling Property include:

- Property Tree – property management, tenancy administration and trust accounting.
- Inspect Real Estate (IRE) – inspection bookings, tenancy enquiries, condition reports and inspection records.
- Agentbox – property listings, sales management, property details, property marketing and sales transaction management.
- FLKItOver – digital document preparation, forms management and transaction documentation.

Why We Collect Personal Information

Dowling Property collects personal information only where it is reasonably necessary to carry out its functions and activities as a real estate agency, to provide requested services, meet contractual obligations and comply with applicable legal and regulatory requirements. The type of information collected will depend on the nature of the services being provided.

Property Management
Personal information is collected to enable Dowling Property to effectively manage residential properties and tenancy relationships. This includes assessing tenancy applications, preparing lease documentation, managing ongoing tenancies, coordinating maintenance, conducting inspections, collecting rent, administering trust accounts and communicating with landlords, tenants and contractors throughout the tenancy.

Property Sales
For residential sales, personal information is collected to facilitate the marketing and sale of properties, communicate with vendors and prospective purchasers, arrange inspections and open homes, negotiate contracts, manage offers, prepare transaction documentation and assist with settlement processes.

Business Operations
Personal information is also collected to support the day-to-day administration of the business. This includes responding to enquiries, maintaining business records, managing customer relationships, resolving complaints, complying with legal obligations, protecting Dowling Property's legal interests and improving the quality of services provided.

Marketing
Where permitted by law, we may use non-sensitive personal information to provide information about its services, upcoming properties, market updates or other relevant communications. Individuals may opt out of receiving marketing communications at any time. Sensitive information is never used for direct marketing purposes.

AML/CTF Compliance
Where Dowling Property is required to comply with the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), personal information may be collected, used and retained to meet those obligations. This may include customer due diligence, identity verification, ongoing customer monitoring, fraud prevention, record keeping and compliance with reporting requirements imposed by law.

Disclosure of Personal Information

Dowling Property will only disclose personal information where it is reasonably necessary to provide our services, fulfil our contractual obligations, comply with legal or regulatory requirements, or where the individual has otherwise consented to the disclosure.

Depending on the nature of the services being provided, personal information may be disclosed to:

- landlords, tenants, purchasers and vendors to facilitate property transactions, tenancy management and related communications
- contractors, tradespeople and service providers engaged to carry out repairs, maintenance, inspections or other property-related services
- financial institutions, insurers and mortgage providers where required to facilitate transactions or meet contractual obligations
- legal advisers, accountants and auditors to obtain professional advice, manage legal matters or meet statutory and financial reporting obligations
- software providers and cloud-based technology providers, including Property Tree, Inspect Real Estate (IRE), Agentbox and FLKItOver, for the purpose of securely managing property information, tenancy administration, sales transactions, inspections and business operations;
- identity verification providers, where required to verify an individual's identity or comply with legal obligations
- government agencies and regulatory authorities, including NSW Fair Trading, the Australian Taxation Office (ATO), courts, tribunals and law enforcement agencies, where disclosure is authorised or required by law.

Where authorised or required by law, information may also be disclosed to AUSTRAC or other regulatory authorities.

Dowling Property does not sell personal information to third parties.

Overseas Disclosure

Dowling Property uses reputable cloud-based technology providers to assist with delivering its services.

As a result, personal information may occasionally be stored, processed or accessed outside Australia.

Before disclosing personal information to an overseas recipient, we will take reasonable steps to ensure that the overseas recipient manages personal information in a manner consistent with the Australian Privacy Principles or is otherwise subject to substantially similar privacy protections.

Where disclosure is authorised or required under another law, including where Dowling Property is required to comply with the AML/CTF Act, overseas disclosure will be managed in accordance with those legislative requirements.

Automated Decision Making

Dowling Property currently does not use artificial intelligence or automated decision-making systems to make decisions that significantly affect the rights or interests of individuals.

Technology may be used to assist administrative tasks such as communication management, property listings, inspection bookings and workflow management; however, all decisions affecting customers are made by appropriately authorised Dowling Property staff.

Should we implement automated decision-making in the future, this Privacy Policy will be updated to explain:

- the kinds of personal information used;
- the kinds of automated decisions made;
- the role automated processing plays in those decisions.

Access to Personal Information

Individuals may request access to personal information held by Dowling Property in accordance with Australian Privacy Principle 12.

Requests should be made using the Dowling Property Personal Information Request for Access / Request for Correction Form.

Dowling Property will take reasonable steps to verify the identity of every applicant before releasing personal information.

Correction of Personal Information

Dowling Property will take reasonable steps to ensure personal information remains accurate, complete, relevant and up to date.

Individuals may request correction of personal information where they believe it is inaccurate, incomplete, misleading or out of date.

Privacy Complaints

If an individual believes Dowling Property has breached the Privacy Act or Australian Privacy Principles, they may submit a written complaint to:

Privacy Officer
Kate Organ
Email: kate@dowlingterrace.com.au
16A William Street, Raymond Terrace NSW 2324

Dowling Property will investigate all complaints promptly and provide a written response.
If an individual is not satisfied with our response, they may lodge a complaint with the Office of the Australian Information Commissioner (OAIC).

3. Internal Privacy Compliance Plan

Purpose
Dowling Property is committed to protecting the privacy of individuals and managing personal information in a lawful, transparent and secure manner.

The purpose of this Internal Privacy Compliance Plan is to document the governance arrangements, policies, procedures and systems adopted by Dowling Property to ensure ongoing compliance with applicable privacy legislation and to promote a culture of privacy awareness across the business.

This plan has been prepared having regard to the Privacy Act 1988 (Cth), the Australian Privacy Principles (APPs), guidance issued by the Office of the Australian Information Commissioner (OAIC) and the current REINSW Privacy Compliance Plan template.

Privacy Governance

Dowling Property recognises that effective privacy management requires clear accountability and ongoing oversight.

Privacy compliance forms part of Dowling Property's governance framework and is supported by documented policies, staff training, secure information management practices and regular review of privacy procedures.

Senior management is responsible for ensuring appropriate resources are available to support privacy compliance and for promoting a culture of responsible information handling throughout the business.

Privacy Officer

Dowling Property has appointed a Privacy Officer who is responsible for overseeing the implementation of this Privacy Compliance Plan.

The Privacy Officer is responsible for:

- overseeing compliance with the Privacy Act and Australian Privacy Principles;
- managing requests for access to and correction of personal information;
- receiving and investigating privacy complaints;
- coordinating responses to actual or suspected data breaches;
- monitoring changes to privacy legislation and regulatory guidance;
- reviewing privacy policies and procedures to ensure they remain current;
- providing guidance to staff on privacy-related matters; and
- maintaining privacy records where appropriate.

The appointed Privacy Officer is:

Kate Organ
Privacy Officer
Dowling Property

Roles and Responsibilities

Protecting personal information is the responsibility of every person working within Dowling Property.

All staff are expected to:

- collect only the personal information reasonably necessary to perform their duties
- handle personal information in accordance with our privacy policies
- protect personal information against unauthorised access, use or disclosure
- report suspected privacy incidents immediately
- complete privacy training as required; and
- maintain confidentiality both during and after their employment.

Managers are responsible for ensuring privacy obligations are incorporated into day-to-day business operations and that staff receive appropriate guidance and supervision.

Staff Training and Awareness

Dowling Property recognises that staff awareness is essential to maintaining effective privacy compliance.

All employees receive privacy training as part of their induction process. Ongoing refresher training is provided periodically and whenever there are significant changes to privacy legislation, business practices or internal policies.

Training may include:

- Australian Privacy Principles;
- handling personal information;
- recognising sensitive information;
- responding to customer requests;
- identifying privacy risks;
- secure use of business systems;
- cyber security awareness;
- data breach reporting procedures; and
- where applicable, privacy obligations relating to AML/CTF compliance.

Staff are encouraged to raise privacy concerns with management and seek guidance whenever uncertain about the appropriate handling of personal information.

Collection Controls

Dowling Property is committed to collecting personal information fairly, lawfully and transparently.

Only personal information that is reasonably necessary for the performance of Dowling Property's functions and activities will be collected.

Where practical, personal information is collected directly from the individual concerned.

Staff must ensure individuals are informed about:

- why information is being collected;
- how it will be used;
- who it may be disclosed to;
- how they may access or correct their information; and
- where further information can be found in our Privacy Policy.

Where Dowling Property is required to comply with the AML/CTF Act, staff must ensure that any information collected for customer due diligence or identity verification purposes is limited to what is reasonably necessary to satisfy those legal obligations.

Government-related identifiers must only be collected where authorised or required by law and must not be adopted as our own identifiers.

Information Security

Dowling Property takes reasonable steps to protect personal information against misuse, interference, loss and unauthorised access, modification or disclosure.

Security measures include:

- password-protected business systems;
- role-based access controls;
- secure cloud-based platforms;
- multi-factor authentication where available;
- antivirus and endpoint protection;
- software updates and security patching;
- secure storage of paper records;
- controlled office access;
- secure disposal of confidential information; and
- regular monitoring of system access where appropriate.

Access to personal information is limited to staff whose duties require that access.

Business Systems

Dowling Property manages personal information using secure business platforms including Property Tree, Inspect Real Estate (IRE), Agentbox and FLKItOver.

These systems support property management, residential sales, inspections, document management, customer communications and trust accounting.

Dowling Property takes reasonable steps to ensure these service providers maintain appropriate privacy, confidentiality and security measures consistent with industry standards and applicable legal requirements.

Data Quality

Dowling Property takes reasonable steps to ensure personal information collected, used or disclosed is accurate, complete, relevant and up to date.

Where inaccuracies are identified, appropriate corrections will be made as soon as reasonably practicable.

Individuals are encouraged to notify us if their personal information changes.

Access and Correction

Dowling Property has procedures in place to enable individuals to request access to or correction of their personal information in accordance with Australian Privacy Principles 12 and 13.

Requests are managed by the Privacy Officer using the Personal Information Request for Access / Request for Correction Form.

Reasonable steps will be taken to verify the identity of every applicant before information is released or amended.

Data Retention and Destruction

Dowling Property retains personal information only for as long as reasonably necessary to fulfil the purpose for which it was collected or where retention is required by law.

Where legal obligations require records to be retained, including obligations under taxation legislation, trust accounting requirements or, where applicable, the AML/CTF Act, records will be securely maintained for the applicable retention period.

Once information is no longer required, it will be securely destroyed or permanently de-identified in accordance with our Data Retention & Destruction Policy and De-Identification of Information Policy.

Privacy Incidents and Data Breaches

All staff are required to immediately report any actual or suspected privacy incident or data breach to the Privacy Officer.

Dowling Property will respond to privacy incidents in accordance with its Data Breach Response Plan by:

- containing the incident where possible;
- assessing the nature and extent of the breach;
- determining whether an eligible data breach has occurred;
- considering notification obligations under the Privacy Act;
- maintaining appropriate records of the incident; and
- implementing corrective actions to reduce the likelihood of recurrence.

Where Dowling Property is required to comply with the AML/CTF Act, any additional reporting or privacy obligations arising from those requirements will also be considered.

Monitoring and Review

Privacy compliance is an ongoing process.

Dowling Property will periodically review this Privacy Compliance Plan to ensure it remains current, reflects legislative changes and continues to support the effective management of personal information.

Reviews may also be undertaken following:

- significant legislative changes
- implementation of new business systems
- changes to business operations
- privacy complaints
- data breaches; or
- recommendations arising from internal reviews or regulatory guidance

Any updates to this plan will be communicated to relevant staff and incorporated into Dowling Property's privacy management framework.

4. Personal Information Request for Access / Request for Correction

Purpose

Dowling Property is committed to ensuring that individuals are able to access and correct their personal information in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs).

This form provides a structured and compliant process for individuals to:

- Request access to personal (including sensitive) information held about them; and/or
- Request correction of personal information that is inaccurate, incomplete, misleading or out of date.

How Requests Are Managed

In accordance with APPs 12 and 13:

- All requests are managed by the Privacy Officer
- The identity of the requester must be verified before information is released or corrected
- Requests are logged and recorded
- Access requests are responded to within a reasonable timeframe (generally within 7 days)

Fees

- No fee is charged for correction requests
- A reasonable fee may apply for access requests, where permitted by law

Refusal of Access

Access may be refused where permitted under the Privacy Act, including where access would:

- Pose a serious threat to health or safety
- Unreasonably impact the privacy of others
- Be unlawful or prejudicial to legal proceedings

Where access is refused, written reasons will be provided.

Completing this form will assist Dowling Property in identifying the information requested, verifying your identity and responding to your request as efficiently as possible.

Personal Information Request for Access / Request for Correction Form

Dowling Real Estate (Raymond Terrace) Pty Ltd
ABN: 29 101 237 281
Trading as: Dowling Property

Personal Information Request for Access / Request for Correction

This form may be used to request:

- access to personal (including sensitive) information we hold about you; and/or
- correction of personal information we hold about you that you believe is inaccurate, incomplete, out of date, irrelevant or misleading.

You are not required to use this form to make a request; however, it helps us process your request efficiently.

Your Details

Title: □ Mr □ Mrs □ Ms □ Other: _____
Surname (required): _____
Given name(s) (required): _____-_____
Date of birth (only if previously provided to us): ____ / ____ / _____
Current residential address (only if previously provided):

Suburb: _____ State: _____ Postcode: _____

Contact Details

Phone (required): _____
Email address (required): _____

Request for Access to Personal Information

□ I am requesting access to the personal (including sensitive) information held about me.
Please describe the information you are requesting (be as specific as possible):

Important: You may only request access to personal information that relates to you.

Request for Correction of Personal Information

□ I am requesting correction of personal (including sensitive) information held about me.

Information to be corrected:

Reason for correction (e.g. inaccurate, out of date, incomplete):

How should the information be corrected:

Fees

- No fee applies to correction requests.
- A reasonable fee may apply to access requests where permitted by law. If a fee applies, you will be notified before your request is processed.

Identity Verification

Dowling Property is committed to protecting the privacy and security of personal information.

Before providing access to, or correcting, personal information, Dowling Property must take reasonable steps to verify the identity of the person making the request. This helps ensure that personal information is not released to an unauthorised person.

Depending on the nature and sensitivity of the information requested, you may be asked to provide additional documentation to verify your identity before your request can be processed.

Examples of acceptable identification may include:

- Driver Licence
- Australian Passport
- Photo Identification Card
- Other government-issued identification

Any identification documents provided will only be used for identity verification purposes and handled in accordance with Dowling Property's Privacy Policy.

Declaration

I declare that:

I am the individual to whom this request relates; and the information provided in this form is true and correct.

Signature: _____

Date: ____ / ____ / _____

Processing Your Request

Dowling Property will acknowledge receipt of your request as soon as reasonably practicable.

We will take reasonable steps to respond within a reasonable period after receiving your request. Where additional time is required due to the complexity of the request or the volume of information involved, we will advise you accordingly.

Dowling Property may refuse access to personal information where permitted under the Privacy Act, including where providing access would:

- unreasonably affect the privacy of another individual
- pose a serious threat to the life, health or safety of any person
- prejudice legal proceedings or law enforcement activities
- reveal commercially sensitive information
- be otherwise permitted or required by law.

Where access is refused, Dowling Property will provide written reasons for the decision unless prohibited by law.

Declaration

I declare that:

I am the individual to whom this request relates; and the information provided in this form is true and correct.

Signature: _____

Date: ____ / ____ / _____

Submitting This Form

Please submit this completed form to:

Kate Organ – Privacy Officer

Email: kate@dowlingterrace.com.au

Post: 16A William Street, Raymond Terrace NSW 2324

Office Use Only

Date received: _____

Identity verified: □ Yes □ No

Request type: □ Access □ Correction

Response due date: _____

Handled by: _____

Outcome: □ Approved □ Partially Approved □ Refused

Notes:

5. Data Breach Response Plan

Purpose

This Data Breach Response Plan establishes the framework for identifying, containing, assessing and responding to actual or suspected data breaches. It also supports Dowling Property's obligations under the Privacy Act 1988 (Cth), the Australian Privacy Principles (APPs) and the Notifiable Data Breaches (NDB) Scheme administered by the Office of the Australian Information Commissioner (OAIC).

Where Dowling Property is required to comply with obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) (AML/CTF Act), any applicable privacy obligations arising in connection with those requirements will also be considered when responding to a data breach.

Scope

This Response Plan applies to all directors, employees, contractors, consultants and any other authorised persons who collect, access, use or manage personal information on behalf of Dowling Property.

The plan applies to personal information held in any format, including:

- electronic records
- paper records
- emails
- mobile devices
- cloud-based systems
- portable storage devices; and
- verbal disclosures of personal information.

What is a Data Breach?

A data breach occurs when personal information held by Dowling Property is:

- lost
- accessed without authorisation
- disclosed without authorisation; or
- otherwise compromised in a manner that may affect the privacy of an individual.

A data breach may occur accidentally, through human error, system failure or malicious activity.

Examples include:

- sending information to the wrong recipient
- loss or theft of laptops, mobile phones or paper files
- unauthorised access to computer systems

- phishing or cyber security incidents;
- ransomware attacks;
- accidental publication of confidential information;
- unauthorised access by employees or third parties.

Not every data breach is an eligible data breach under the Privacy Act. Each incident must be assessed to determine whether it is likely to result in serious harm to one or more individuals.

Roles and Responsibilities

All staff play an important role in protecting personal information and responding appropriately to privacy incidents.

Privacy Officer (Kate Organ)
The Privacy Officer is responsible for:

- coordinating the response to data breaches;
- ensuring incidents are properly assessed;
- determining whether notification obligations apply;
- liaising with regulators where required;
- coordinating communications with affected individuals;
- maintaining the Data Breach Register;
- reviewing incidents and implementing corrective actions.

Immediate Staff Responsibilities

Any employee who becomes aware of an actual or suspected data breach must immediately:

- notify the Privacy Officer or senior management
- take reasonable steps to contain the incident where safe to do so
- preserve evidence relating to the incident
- avoid deleting, altering or destroying relevant records
- maintain confidentiality throughout the investigation

Staff should not attempt to investigate or communicate externally regarding the incident unless authorised by the Privacy Officer.

Responding to a Data Breach

Dowling Property will respond to all suspected data breaches using the following four-stage process.

Step 1: Contain the Breach
The first priority is to minimise any further unauthorised access, disclosure or loss of personal information.

Containment actions may include:

- recovering lost documents or devices
- isolating affected systems
- changing passwords or access credentials
- suspending compromised user accounts
- disabling system access
- engaging IT support or cybersecurity specialists where required

Every effort should be made to prevent further harm while preserving evidence needed for investigation.

Step 2: Assess the Breach

Once the immediate risk has been contained, Dowling Property will assess:

- the nature of the incident
- the personal information involved
- the number of individuals affected
- whether sensitive information is involved
- whether the information is protected or encrypted
- whether the information has been recovered
- the likelihood of serious harm occurring

Where appropriate, legal or professional advice may be obtained.

The assessment will generally be completed within 30 days, consistent with the Notifiable Data Breaches Scheme.

Step 3: Notification

If the assessment determines that an eligible data breach has occurred, Dowling Property will notify affected individuals and the Office of the Australian Information Commissioner (OAIC) as soon as practicable.

Notifications will generally include:

- a description of the incident
- the types of personal information involved
- the steps taken to contain the breach
- recommendations for affected individuals to minimise potential harm
- contact details for further information

Where Dowling Property is required to comply with the AML/CTF Act, consideration will also be given to whether any additional reporting obligations arise under applicable legislation.

Step 4: Review and Improve

Following every privacy incident, we will conduct a review to identify opportunities for improvement.

The review may include:

- identifying the root cause of the incident;
- evaluating the effectiveness of the response;
- updating policies and procedures;
- implementing additional technical safeguards;
- improving staff training;
- strengthening security controls;
- documenting lessons learned.

Data Breach Register

Dowling Property will maintain an internal Data Breach Register to record all actual and suspected privacy incidents, including incidents that do not meet the threshold of an eligible data breach.

The register should include, where applicable:

- date of the incident
- description of the incident
- information affected
- individuals impacted
- assessment outcome
- actions taken
- notification decisions
- corrective actions implemented
- date the matter was finalised

Maintaining a Data Breach Register assists Dowling Property in identifying recurring risks, monitoring trends and demonstrating compliance with privacy obligations.

Information Security

Dowling Property reduces the risk of privacy incidents by implementing reasonable administrative, physical and technical safeguards, including:

- role-based system access
- password protection and multi-factor authentication where available
- secure cloud-based systems
- antivirus and endpoint protection
- software updates and security patching
- secure storage of paper records
- secure destruction of confidential information
- ongoing staff awareness training

While these measures significantly reduce risk, no system can guarantee complete protection against every privacy incident.

Review of this Plan

This Data Breach Response Plan will be reviewed periodically to ensure it remains current and effective.

Reviews will also be undertaken following:

- significant legislative changes
- changes to business operations
- implementation of new technology
- a significant privacy incident
- recommendations arising from internal reviews or regulatory guidance

Updates will be approved by management and communicated to relevant staff.

6. Data Retention & Destruction Policy

Purpose

Dowling Property recognises that personal information should only be retained for as long as it is reasonably necessary to fulfil the purpose for which it was collected or where retention is required by law.

The purpose of this Policy is to establish a consistent approach to the retention, secure destruction and de-identification of personal information to reduce privacy risks, protect confidential information and support compliance with the Privacy Act 1988 (Cth), the Australian Privacy Principles (APPs) and other applicable legislation.

Where Dowling Property is required to comply with the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) (AML/CTF Act), records required under that legislation will be retained for the applicable statutory retention period before being securely destroyed or de-identified where appropriate.

Scope

This Policy applies to all directors, employees, contractors and authorised representatives of Dowling Property who collect, access, use, store or manage personal information on behalf of the business.
The Policy applies to personal information held in any format, including:

- electronic records;
- paper files;
- emails;
- scanned documents;
- photographs;
- inspection reports;
- trust accounting records;
- portable storage devices; and
- cloud-based business systems.

Our Commitment

Dowling Property is committed to managing personal information responsibly throughout its entire lifecycle.

We recognise that retaining information longer than necessary increases privacy and information security risks. Accordingly, we aim to:

- retain personal information only for as long as reasonably necessary;
- comply with statutory record retention obligations;
- securely destroy information that is no longer required;
- permanently de-identify information where appropriate; and
- minimise the risk of unauthorised access, misuse or disclosure.

Retention Principles

When determining how long personal information should be retained, Dowling Property will consider:

- the purpose for which the information was collected
- whether the information is still required to provide services
- contractual obligations
- legal and regulatory retention requirements
- potential legal proceedings
- taxation and trust accounting obligations
- business operational requirements; and
- where applicable, obligations arising under the AML/CTF Act.

Personal information will not be retained indefinitely unless there is a lawful reason for doing so.

Legal Retention Requirements

Certain legislation requires Dowling Property to retain specific records for prescribed periods. Examples include:

- taxation and financial record keeping requirements
- trust accounting obligations
- employment records
- property transaction records
- court orders or legal proceedings
- where applicable, records required under the AML/CTF Act.

Where legal obligations require information to be retained, we will securely maintain those records for the applicable retention period, even where the original business purpose has concluded.

Storage of Information

While retained, personal information will be stored securely using reasonable administrative, physical and technical safeguards.

Depending on the nature of the information, security measures may include:

- secure cloud-based business systems
- password-protected databases
- role-based access controls
- encrypted electronic storage where appropriate
- regular system updates and security monitoring

Access to retained records will be limited to authorised personnel who require access to perform their duties.

Secure Destruction

When personal information is no longer required and there is no legal obligation to retain it, Dowling Property will take reasonable steps to securely destroy the information.

Secure destruction methods may include:

Paper Records

Paper records containing personal information will be cross-cut shredded or disposed of through an approved confidential document destruction service.

Electronic Records

Electronic records will be permanently deleted from active systems where practicable and removed in accordance with the capabilities of the relevant software platform or storage system.

Where electronic devices are retired or replaced, reasonable steps will be taken to ensure personal information cannot be recovered before disposal or recycling.

Suspension of Destruction

Personal information must not be destroyed where Dowling Property becomes aware that the information may be required for:

- current or anticipated legal proceedings
- regulatory investigations
- complaints
- insurance claims
- audits
- law enforcement requests
- statutory obligations

In these circumstances, destruction will be suspended until the relevant matter has been finalised.

Staff Responsibilities

All employees are responsible for ensuring personal information is managed in accordance with this Policy.

Staff must:

- retain records only where necessary;
- securely store personal information;
- report any concerns regarding record management;
- follow approved destruction procedures;
- ensure confidential information is not disposed of using ordinary waste disposal methods; and
- seek guidance from the Privacy Officer where uncertain about retention requirements.

Monitoring and Review

Dowling Property will periodically review this Policy to ensure it remains consistent with legislative requirements, regulatory guidance and business practices.

Reviews may also occur following:

- legislative amendments
- significant operational changes
- implementation of new technology
- privacy incidents or data breaches
- recommendations arising from internal reviews

Any amendments to this Policy will be communicated to relevant staff and incorporated into Dowling Property's privacy management framework.

7. Cross-Border Privacy Policy

Purpose

Dowling Property uses cloud-based technologies and third-party service providers that may involve the storage or processing of personal information outside Australia.

This Policy outlines how Dowling Property manages overseas disclosures of personal information in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs). Where Dowling Property is required to comply with the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) (AML/CTF Act), any overseas disclosures will also be managed in accordance with applicable legal requirements.

Our Commitment

Dowling Property is committed to protecting personal information when it is disclosed to overseas recipients. We take reasonable steps to ensure overseas service providers handle personal information in accordance with the Australian Privacy Principles or comparable privacy standards. Where this is not possible, personal information will only be disclosed where permitted or authorised by law.

When Overseas Disclosure May Occur

Dowling Property primarily stores and manages personal information within Australia. However, due to the nature of modern cloud-based technology, personal information may occasionally be processed, stored or accessed from overseas.

This may occur where Dowling Property uses:

- cloud-based property management platforms
- inspection management software
- sales and property marketing systems
- document management systems
- email hosting services
- cloud storage providers
- software support or maintenance services

These disclosures generally occur as part of the normal operation of secure technology platforms used to deliver our real estate services.

Reasonable Steps Taken

Before engaging third-party technology providers, Dowling Property will take reasonable steps to assess the provider's ability to appropriately protect personal information.

Reasonable Steps Taken

Before engaging third-party technology providers, we will take reasonable steps to assess the provider's ability to appropriately protect personal information.
Depending on the circumstances, these steps may include:

- reviewing privacy policies
- reviewing contractual privacy obligations
- assessing information security practices
- considering recognised security certifications
- limiting the personal information disclosed
- restricting user access
- implementing secure authentication controls
- monitoring service provider performance where appropriate

Overseas Recipients

Dowling Property does not intentionally disclose personal information to overseas recipients unless:

- disclosure is reasonably necessary for the provision of our services
- the individual has been informed where required
- the disclosure is authorised or required by law
- appropriate privacy safeguards have been implemented; or
- another exception under the Privacy Act applies

Where practicable, we will identify the countries in which overseas recipients are likely to be located.

Where this is not practicable due to the nature of cloud-based services, we will continue to monitor service providers and ensure reasonable privacy protections remain in place.

AML/CTF Considerations

Where Dowling Property is required to comply with obligations under the AML/CTF Act, personal information may be disclosed where authorised or required under that legislation.

Any such disclosures will be managed consistently with applicable privacy obligations and only to the extent reasonably necessary to satisfy legal requirements.

Privacy Incidents

If Dowling Property becomes aware that personal information disclosed to an overseas recipient has been compromised, the matter will be managed in accordance with our Data Breach Response Plan.

The Privacy Officer will assess whether the incident gives rise to notification obligations under the Privacy Act and, where applicable, any other legislative requirements.

8. De-Identification of Information Policy

Purpose

Dowling Property is committed to protecting personal information throughout its lifecycle. This Policy outlines how personal information is permanently de-identified when it is no longer required, in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs). Where applicable, information will only be de-identified after any legal retention requirements, including those under the AML/CTF Act, have been met.

Scope

This Policy applies to all directors, employees and authorised representatives of Dowling Property who collect, use, store or manage personal information.

It applies to personal information held in both paper and electronic formats, including records stored within our business systems and cloud-based platforms.

What is De-Identification?

When de-identifying personal information, Dowling Property will take reasonable steps to reduce the risk of an individual being identified.
Depending on the information involved, this may include:

- removing names and contact details;
- removing government identifiers;
- removing account or reference numbers;
- aggregating information;
- replacing identifying information with anonymous references; or
- permanently removing identifying data from electronic records.

De-Identification Principles

When de-identifying personal information, Dowling Property will take reasonable steps to reduce the risk of an individual being identified.

Depending on the information involved, this may include:

- removing names and contact details
- removing government identifiers
- removing account or reference numbers
- aggregating information
- replacing identifying information with anonymous references; or
- permanently removing identifying data from electronic records.

Responsibilities

All employees are responsible for ensuring personal information is handled in accordance with this Policy.

The Privacy Officer is responsible for overseeing the implementation of this Policy, providing guidance to staff and ensuring de-identification practices remain consistent with applicable privacy obligations.