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## **PRIVACY POLICY**

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### **Realty Assist Australia Pty Ltd trading as CommCollect (ACN 639 613 808)**

This Privacy Policy applies to all personal information collected by Realty Assist Australia Pty Ltd trading as CommCollect (ACN 639 613 808). This policy summarises the methods we utilise to manage personal information we collect to meet the requirements of the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs).

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#### **1. PERSONAL INFORMATION**

- (a) The Privacy Act 1988 (Cth) currently defines “personal information” as meaning information or an opinion about an identified individual or an individual who is reasonably identifiable:
  - (i) whether the information or opinion is true or not; and
  - (ii) whether the information or opinion is recorded in a material form or not.
- (b) If information does not disclose your identity or enable your identity to be ascertained, it will in most cases not be classified as “personal information” and will not be subject to this privacy policy.

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#### **2. INFORMATION COLLECTED**

The personal information which we collect and hold about parties including clients, guarantors, debtors and associates may include;

- (a) Identification information, such as name, address, date of birth, drivers licence number and tax file number;
- (b) the type and amount of commercial credit applied for;
- (c) information on civil litigation related to the provision of credit;
- (d) insolvency and other sensitive information;
- (e) credit provider history;
- (f) consumer credit liability information; and
- (g) other credit related personal information.

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#### **3. COLLECTION PROCESS**

- (a) We may collect personal information from you whenever you provide such information to us.
- (b) We may obtain personal information from other providers such as government and credit reporting bodies, to the extent that we are entitled to obtain this information under the law.

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#### **4. PURPOSE OF COLLECTION**

- (a) The purpose for which we collect personal information is to provide you with the best service experience possible.

- (b) We customarily disclose personal information only to our service providers who assist us in operating our services.
- (c) By using our services, you consent to the receipt of direct marketing material. We will only use your personal information for this purpose if we have collected such information direct from you, and if it is material of a type which you would reasonably expect to receive from use. We do not use sensitive personal information in direct marketing activity. Our direct marketing material will include a simple means by which you can request not to receive further communications of this nature.

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## **5. DISCLOSURE OF PERSONAL INFORMATION**

We may be required by law to disclose personal information to regulatory bodies, government agencies, law enforcement bodies, courts and other entities.

We may disclose personal information to other parties in the course of providing our services. Personal information may be disclosed to parties including;

- (a) companies related to us;
- (b) credit reporting bodies and other credit providers including underwriters and insurers;
- (c) any contractor or service provider engaged by us;
- (d) client guarantors and agents;
- (e) creditors, debt sellers and assignees;
- (f) dispute resolution providers;
- (g) our professional advisors;
- (h) other third parties involved in carrying out our services; and
- (i) parties you have consented for personal information be disclosed to.

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## **6. STORAGE AND SECURITY**

CommCollect takes reasonable steps to ensure that personal information we hold is protected from unauthorised access, misuse and loss. We have procedures in place to safeguard information we hold which include electronic and physical safety measures.

Other parties who we may disclose personal information to in the course of providing our services, are also required to comply with Australian privacy laws. Our staff are required to maintain the confidentiality of personal information and access to personal information is restricted to staff who require access to perform our services.

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## **7. ACCESS AND CORRECTION**

Australian Privacy Principle 12 permits you to obtain access to the personal information we hold about you in certain circumstances, and Australian Privacy Principle 13 allows you to correct inaccurate personal information subject to certain exceptions. If you would like to obtain such access, please contact us as set out below.

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**8. COMPLAINT PROCEDURE**

If you have a complaint concerning the manner in which we maintain the privacy of your personal information, please contact us as set out below. All complaints will be considered by our privacy officer and we may seek further information from you to clarify your concerns. If we agree that your complaint is well founded, we will, in consultation with you, take appropriate steps to rectify the problem. If you remain dissatisfied with the outcome, you may refer the matter to the Office of the Australian Information Commissioner.

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**9. OVERSEAS TRANSFER**

Your personal information may be transferred to recipients located outside of Australia. Any overseas service provider that we may use will have data protection laws which protect personal information in a way which is at least substantially similar to the Australian Privacy Principles, and there will be mechanisms available to you to enforce protection of your personal information under that overseas law. In the circumstances we do not require the overseas recipients to comply with the Australian Privacy Principles, we will not be liable if your personal information is mishandled.

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**10. HOW TO CONTACT US ABOUT PRIVACY**

For all privacy enquiries, you can contact us at:

The Privacy Officer  
CommCollect  
47 Hay Street  
SUBIACO WA 6008  
[info@realtyassist.com.au](mailto:info@realtyassist.com.au)