

# Privacy Policy & Collection Notice

## Overview

The Privacy Act 1988 (Cth) (Privacy Act) governs how we collect, use, disclose and store personal information, including sensitive information (as defined in the Privacy Act).

In this Privacy Policy & Collection Notice, references to “personal information” include sensitive information where applicable.

We collect, use and disclose personal information for the purposes of operating our property management and accommodation business, which primarily involves managing occupancy arrangements under licence-style and occupancy agreements. This includes assessing applications, onboarding occupants, managing ongoing occupancy and communications, coordinating maintenance and services, and complying with our contractual and legal obligations.

We may update, revise or replace this Privacy Policy & Collection Notice from time to time to reflect changes in our business practices, systems, or legal requirements. The most current version will be made available on our website.

This Privacy Policy & Collection Notice is available on our website and may be provided to you or otherwise brought to your attention at or around the time we collect your personal information, including during applications and onboarding processes.

## What personal information do we collect?

We collect and hold personal information that is reasonably necessary to operate our property management and accommodation business, including assessing applications, managing occupancy arrangements, and providing ongoing services.

The types of personal information we collect may include:

- **Identity and contact information**
  - full name
  - date of birth
  - phone number
  - email address
  - residential address
- **Identification and verification information**
  - driver licence details
  - passport details
  - other identification documents provided for verification purposes
- **Application and eligibility information**
  - information provided in occupancy or application forms
  - rental or occupancy history
  - references and referee details
  - declarations provided by applicants
- **Financial and employment information**
  - employment details
  - occupation and income information

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- payslips and supporting financial documents
    - bank statements or screenshots used to verify financial capacity
  - **Emergency and additional personal details**
    - emergency contact details
    - relationship information for emergency contacts
  - **Vehicle and property-related information**
    - vehicle registration details
    - vehicle information where parking or property access is relevant
  - **Communication and interaction records**
    - email communications
    - records of enquiries and interactions with our business
    - internal notes relating to communications, complaints or service requests
  - **Operational and service-related information**
    - maintenance requests
    - service records
    - inspection records and related information
  - **Media and supporting documentation**
    - photographs or images relating to properties, inspections or condition reports
    - documents provided in support of applications or occupancy

We may also collect personal information from third parties where reasonably necessary, including referees, previous landlords or agents, contractors, tenancy or credit databases (such as TICA), or publicly available sources.

We only collect personal information that is reasonably necessary for our business activities and take reasonable steps to ensure that the information collected is relevant, accurate and up to date.

## How we collect personal information from you

We collect personal information from you in a number of ways, including directly from you and through the systems and processes we use to operate our business.

We will collect personal information from you in the following circumstances:

- **Applications and onboarding**
  - when you apply for accommodation, occupancy or a tenancy with us, including completing an application form or providing supporting documentation
  - when you provide identification, financial information, or other documents to verify your identity or suitability
  - when you enter into an occupancy agreement, licence-style arrangement, or residential tenancy agreement (RTA) with us and complete onboarding requirements
- **During occupancy or tenancy**
  - when you communicate with us by email or other electronic means
  - when you submit maintenance requests, service requests or enquiries
  - when we manage your occupancy or tenancy, including ongoing communication, compliance, rent or occupancy fee management, and operational matters
- **Enquiries and general interactions**
  - when you contact us to make an enquiry about accommodation, occupancy, tenancy or our services
  - when you provide information to us during communications or interactions with our business

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- **Electronic systems and platforms**
    - when you submit information through electronic platforms used in our business, including application systems, document execution platforms, and communication systems
    - when information is recorded in our systems as part of managing your application, occupancy, tenancy or interactions with us
  - **Property owners, landlords and managing agents**
    - if you are a property owner, landlord, property manager, managing agent or their authorised representative and you engage us to manage or lease a property or act on your behalf, we will collect personal information from you in order to identify you, manage the property, and perform our services
    - we may also collect and use personal information from such parties in connection with managing properties, occupancy arrangements, tenancy arrangements, compliance obligations, and related services carried out on their behalf

We may also collect personal information through third-party service providers or platforms that we use to operate our business, where you provide your information through those systems.

We may collect personal information through a combination of direct interaction, electronic systems, and third-party platforms used in the operation of our business.

We take reasonable steps to ensure that personal information collected from you is collected in a lawful and fair manner.

## How we collect personal information from other sources

We may collect personal information about you from other sources in any manner permitted by the Privacy Act 1988 (Cth). We will only collect personal information from other sources where it is reasonably necessary for us to do so in connection with the services we provide.

Examples of such sources include:

- property owners, landlords, property managers, managing agents or their authorised representatives in connection with managing properties, occupancy arrangements or tenancy arrangements
- your agents, representatives, referees, employers or other individuals nominated by you as part of an application, verification or reference-checking process
- tenancy or credit databases (such as TICA or other lawful databases) for the purposes of assessing applications, verifying information or managing occupancy or tenancy arrangements
- contractors, tradespeople, insurers, financial institutions, payment providers, legal or other professional advisers engaged in connection with property management, maintenance, payments or related services
- public registers and publicly available information, including information made available through government agencies or other lawful sources
- service providers and third-party platforms that assist us in operating our business, including where those parties are authorised to provide us with personal information

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We will take reasonable steps to ensure that any personal information collected from third parties is collected lawfully and handled in accordance with this Privacy Policy & Collection Notice.

## When the law authorises or requires collection of personal information

There are circumstances where we are authorised or required by law to collect, use or disclose personal information. For example, we may be required to collect and disclose your personal information pursuant to the *Property, Stock and Business Agents Act 2002 (NSW)*, including any regulation under that law.

This may include where we are required to comply with applicable legislation relevant to our business, including but not limited to:

- the Privacy Act 1988 (Cth)
- the Residential Tenancies Act 2010 (NSW)
- the Boarding Houses Act 2012 (NSW)
- the Property and Stock Agents Act 2002 (NSW)
- any other applicable Commonwealth or State laws, regulations or lawful requirements

We may also collect, use or disclose personal information where required to comply with court orders, tribunal proceedings, regulatory requests, or other legal obligations.

## How your personal information may be used

We may collect, use and disclose your personal information for purposes reasonably necessary to operate our property management and accommodation business and to provide our services.

This may include:

- **Identity verification and application assessment**
  - to identify you and verify your identity as an occupant, tenant, landlord, property owner, property manager or authorised representative
  - to process and assess any application for accommodation, occupancy or tenancy
  - to verify information provided in your application, including through reference checks and database checks where permitted by law
- **Managing occupancy and tenancy arrangements**
  - to negotiate, prepare, enter into and administer occupancy agreements, licence-style arrangements or residential tenancy agreements (RTA)
  - to manage ongoing occupancy or tenancy, including communication, rent or occupancy fee collection and account management
  - to prepare statements of account and manage payments, including through trust or controlled accounts where applicable
  - to update and maintain your records and contact details
- **Property management and operational services**
  - to coordinate maintenance, repairs and property-related services
  - to manage property access, safety, security and operational requirements
  - to liaise and exchange information with occupants, tenants, landlords, property owners, managing agents, contractors, insurers, legal, financial or other professional advisers in connection with the property or services
  - to ensure the safety and security of properties, occupants and other individuals in connection with inspections or property access

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- **Communication and customer service**
    - to respond to enquiries, requests and communications
    - to provide updates, notices and information relevant to your occupancy, tenancy or interactions with us
  - **Verification, compliance and risk management**
    - to verify your identity, financial capacity and suitability
    - to conduct reference checks, tenancy database checks (such as TICA) or other lawful verification processes
    - to investigate complaints, disputes or incidents
    - to enforce our contractual rights and obligations
    - to detect, prevent and investigate fraud, misconduct or unlawful activity
  - **Legal and regulatory compliance**
    - to comply with applicable laws, regulations and legal obligations
    - to respond to lawful requests from courts, tribunals, regulators or government authorities
    - to confirm whether you are registered for GST or other regulatory requirements where relevant
  - **Insurance, financial and administrative purposes**
    - to provide insurers or financial institutions with information relating to a property, occupancy or tenancy where reasonably required
    - to operate, manage and reconcile payments, accounts and financial systems
  - **Automated decision-making processes**
    - to use personal information in automated or semi-automated systems (including software platforms and workflows) to assist in processing applications, managing services, assessing risk, or supporting operational decisions that may impact services provided to you
  - **Business operations and administration**
    - to maintain internal systems, records and operational processes
    - to perform administrative and operational tasks necessary to run our business efficiently
    - to provide statistical or operational information to industry bodies, service providers or partners where reasonably required
  - **Business transactions and restructuring**
    - if we enter into or propose to enter into any arrangement in connection with the sale, transfer or restructuring of our business (including any part of our business that involves personal information), we may disclose personal information to relevant parties and their advisers in connection with those arrangements
  - **Marketing and additional services**
    - to inform you about accommodation, tenancy or related services that we provide, unless you tell us not to (direct marketing)
    - to create and publish content, including photographs, videos or other media relating to our business, properties or services, provided that we do not disclose your personal information without consent unless otherwise permitted by law
  - **Information handling and system-based processing**
    - to store, manage and process personal information within the systems and platforms used to operate our business
    - to verify, cross-check and compare personal information for accuracy, completeness and fraud prevention purposes

- to disclose personal information to service providers, contractors, property owners, managing agents or other relevant parties where reasonably necessary to provide our services
- to allow authorised personnel, including staff and service providers (including those located overseas, such as support or administrative personnel), to access and process personal information in connection with performing their duties on our behalf

We will only use or disclose personal information for purposes that are reasonably necessary for our business activities, for a purpose you would reasonably expect, for a purpose to which you have consented, or as otherwise permitted or required by law.

You may tell us at any time if you no longer wish to receive direct marketing communications from us. We will process your request as soon as reasonably practicable.

## How we share your personal information

We may disclose or provide access to your personal information to third parties where reasonably necessary to operate our property management and accommodation business and to provide our services.

### Sharing personal information with third parties

We may disclose personal information to:

- property owners, landlords, property managers, managing agents or their authorised representatives in connection with managing properties, occupancy arrangements or tenancy arrangements
- contractors, tradespeople and service providers engaged in connection with maintenance, repairs, cleaning, inspections or other operational services
- referees, employers or other individuals nominated by you for the purposes of verifying your identity, suitability or application details
- tenancy or credit databases (such as TICA or other lawful databases) for the purposes of assessing applications, verifying information or managing occupancy or tenancy arrangements
- financial institutions, payment providers or other entities involved in processing payments, verifying financial information or managing accounts
- insurers, insurance brokers or claims-related service providers where reasonably required in connection with a property, occupancy or tenancy
- legal, accounting or other professional advisers where reasonably necessary in connection with our services or business operations
- government authorities, regulatory bodies, courts, tribunals or law enforcement agencies where required or authorised by law
- debt collection agencies or enforcement service providers in connection with recovering unpaid amounts or enforcing contractual obligations
- service providers and third-party platforms (including IT, communication, document management, workflow or data processing providers) that assist us in operating our business
- any party to whom disclosure is reasonably necessary in connection with a complaint, dispute, investigation or legal process
- any person or entity authorised by you to receive your personal information

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## Sharing personal information with related companies

We may share personal information with related entities or associated businesses where reasonably necessary for the purposes described in this Privacy Policy & Collection Notice.

## Sharing personal information outside of Australia

We may disclose or provide access to your personal information to persons or entities located outside Australia where reasonably necessary to operate our business and provide our services.

This may include:

- authorised staff, contractors or service providers located overseas who perform administrative, operational or support functions on our behalf
- third-party service providers or platforms that store, process or manage personal information as part of our business systems

Where we disclose personal information to overseas recipients, we take reasonable steps to ensure that those recipients handle personal information in a manner consistent with the Australian Privacy Principles, including through contractual obligations, system controls, and internal policies.

You acknowledge that in some circumstances, overseas recipients may be located in jurisdictions that do not have privacy laws equivalent to those in Australia.

By providing your personal information to us, you consent to the disclosure of your personal information to overseas recipients as described in this Privacy Policy & Collection Notice.

## If you do not provide personal information

If you do not provide personal information requested by us, we may not be able to assess your application, provide accommodation, occupancy or tenancy services, or otherwise perform our services effectively.

For example, we may not be able to:

- assess or process your application for accommodation, occupancy or tenancy, or proceed with onboarding
- verify your identity, financial capacity or suitability for accommodation or tenancy
- enter into or administer an occupancy agreement, licence-style arrangement or residential tenancy agreement (RTA), including where your personal information is required to be included in those documents
- communicate with property owners, landlords or managing agents in relation to your application, occupancy or tenancy
- provide access to a property, inspection or related services where identification or registration is required
- manage your occupancy or tenancy, including rent or occupancy fee collection, maintenance coordination, compliance or operational matters
- verify ownership or authority of a property owner, landlord, property manager or managing agent where personal information is required to manage a property or provide services
- provide ongoing property management, accommodation or related services

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We may also be unable to provide you with information about other accommodation, occupancy, tenancy or related services that we offer if you choose not to receive such communications.

We will only request personal information that is reasonably necessary for our business activities, and you may choose not to provide certain information where it is lawful and practicable to do so.

## Personal information about other people

If you provide us with personal information about another person in relation to, or in connection with, an application, occupancy, tenancy or property management services:

- we are entitled to assume that you have the authority to provide that personal information to us and that you have informed the individual of this
- we have collected that personal information for the purposes set out in this Privacy Policy & Collection Notice
- we may use or disclose that personal information to other organisations for the purposes set out in this Privacy Policy & Collection Notice
- we will handle that personal information in the same way as set out in this Privacy Policy & Collection Notice and the individual may:
  - access or request a copy of this Privacy Policy & Collection Notice; or
  - request access to the personal information we hold about them

## Anonymity and pseudonymity

Where practicable, you may deal with us without identifying yourself or by using a pseudonym.

However, in many cases it is not practical for us to do so. This will particularly apply where we are providing accommodation, occupancy, tenancy or property management services, including assessing applications, entering into occupancy or tenancy arrangements, or managing ongoing services.

We may also require individuals to identify themselves where this is necessary for security, operational or compliance reasons, including in connection with access to properties.

Where it is lawful and practicable, we may still provide general information to individuals who do not wish to identify themselves, such as responding to general enquiries about accommodation or our services.

However, if you contact us by email or other electronic or written means, your identity may be apparent from the information you provide.

## Information security

We take reasonable steps to protect all information which we hold (including any personal or sensitive information) from misuse, interference, loss, unauthorised access, modification or disclosure.

These steps may include implementing physical, administrative and technical security measures, including access controls, user permissions, secure storage, encryption (where appropriate), and monitoring of system activity.

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We also take reasonable steps to ensure that personal information is only accessed by authorised personnel, including employees, contractors and service providers (including those located overseas), where such access is necessary for the performance of their duties.

Where we use third-party platforms or service providers to store or process personal information, we take reasonable steps to ensure that those providers handle personal information in a manner consistent with the Australian Privacy Principles.

We also take reasonable steps to destroy or de-identify personal information when it is no longer required for our business purposes, unless we are required to retain it by law or for legitimate business or legal reasons.

## Marketing and opt-out

We may use personal information (excluding sensitive information) to communicate with you about accommodation, occupancy, tenancy or related services that we provide, where it would be reasonable for you to expect such communications.

This may include:

- providing information about available accommodation, occupancy or tenancy opportunities
- providing updates about services, changes or relevant information relating to our business
- conducting research, analysis or service improvements to better understand and meet customer needs

We will not use your sensitive information for marketing purposes without your consent.

You may opt out of receiving marketing communications from us at any time by following the unsubscribe instructions provided in the communication or by contacting us directly.

We will process any opt-out request as soon as reasonably practicable.

## Accessing your Personal Information

You may request access to personal information that we hold about you and request that it be corrected if you believe it is inaccurate, out of date, incomplete, irrelevant or misleading.

We will respond to requests for access or correction within a reasonable period and in accordance with the Privacy Act 1988 (Cth).

Before providing access to personal information, we may require you to verify your identity to ensure that personal information is not disclosed to an unauthorised person.

We may charge a reasonable fee to cover the administrative costs of providing access to personal information where permitted by law.

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Requests for access to or correction of personal information, as well as any privacy enquiries or complaints, should be directed to:

**Privacy Officer**

Reck Group Pty Ltd (ACN 628 994 034) trading as ShareSorted  
61–63 Railway Parade Marrickville NSW 2204  
Phone: (02) 8201 6918  
Email: [sharesorted@email.propertyme.com](mailto:sharesorted@email.propertyme.com)

If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner (OAIC):

<b>Phone enquiries</b>	<a href="tel:1300363992">1300 363 992</a>
<b>Website</b>	<a href="http://www.oaic.gov.au/">http://www.oaic.gov.au/</a>
<b>Post</b>	GPO Box 5288 Sydney NSW 2001
<b>Fax</b>	+61 2 9284 9666