

SHELTER PROPERTY GROUP PTY LTD

Trading as Shelter Real Estate

ABN 50 633 805 124

PRIVACY POLICY

Prepared in accordance with the

Privacy Act 1988 (Cth)

Australian Privacy Principles (APPs)

Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)

Document Title	Privacy Policy
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1. Introduction and Purpose

Shelter Property Group Pty Ltd (ABN 50 633 805 124), trading as Shelter Real Estate (referred to in this policy as “we”, “our”, or “us”), is committed to protecting the privacy and security of personal information entrusted to us by our clients, customers, tenants, landlords, vendors, purchasers and other individuals with whom we interact in the course of our business.

This Privacy Policy explains how we collect, hold, use, disclose, and otherwise manage personal information in accordance with the Privacy Act 1988 (Cth) (the Act) and the thirteen Australian Privacy Principles (APPs) contained in Schedule 1 of that Act. A copy of the APPs may be obtained from the website of the Office of the Australian Information Commissioner at www.oaic.gov.au.

We provide residential property sales, auctions, and property management services throughout Victoria. In doing so, we collect personal information that is reasonably necessary for the provision of those services.

By providing personal information to us, you consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy (as amended from time to time) and any other arrangements that apply between you and us.

This policy is available free of charge on our website at shelterrealestate.com.au and in hard copy on request at our office.

2. Definitions

In this Privacy Policy, the following terms have the following meanings:

Personal Information means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether or not the information or opinion is true and whether or not it is recorded in a material form, as defined in section 6 of the Privacy Act 1988 (Cth).

Sensitive Information means information about an individual’s racial or ethnic origin, political opinions, religious beliefs, sexual orientation, criminal record, health information, genetic information, biometric information or biometric templates, or membership of a professional or trade association, as defined in the Act.

Non-personal Information means any information that does not reveal your specific identity or does not directly relate to an identifiable individual, including aggregated or de-identified data.

Minor means an individual under the age of 18 years.

Third Parties means our partners, employees, affiliates, contractors, service providers, marketing partners, property advertising platforms and other organisations to whom we may disclose personal information as described in this policy.

Website means shelterrealestate.com.au and any associated subdomains.

3. Kinds of Personal Information We Collect

The types of personal information we may collect depend on the nature of your interaction with us and the services we are providing. The personal information we collect and hold may include:

3.1 Identity and Contact Information

- Full name, date of birth and gender
- Residential and postal addresses
- Telephone numbers (mobile and landline)
- Email addresses
- Photographic identification (e.g. driver's licence, passport)

3.2 Financial and Employment Information

- Employment details, including employer name, position and income
- Bank account details (for rental payments, bond lodgement and disbursements)
- Rental history and tenancy references
- Credit check authorisations (with consent)
- Vendor settlement details
- ABN and/or ACN, profit and loss statements, balance sheets and mortgage details where relevant to a transaction

3.3 Property-Related Information

- Property ownership records and title details
- Lease and tenancy agreement details
- Maintenance request records
- Inspection reports and property condition records
- Open home and inspection attendance registers

3.4 Digital and Technical Information

- Information submitted via our website, including enquiry forms and email correspondence
- Website usage data collected via cookies and analytics tools (e.g. IP address, browser type, device type, geo-location, pages visited)
- Information provided via third-party property portals (e.g. realestate.com.au, Domain)
- Information obtained through social media interactions, including where you authenticate your details via Facebook or LinkedIn, or "like", "follow" or comment on our social media pages

3.5 Identity Verification Information (AML/CTF)

- Government-issued photographic identification (passport, driver's licence, proof of age card)
- Secondary identification documents (Medicare card, utility bills, rates notices)
- Beneficial ownership information for corporate or trust entities
- Source of funds or source of wealth information where required
- Politically Exposed Person (PEP) and sanctions screening results
- Electronic identity verification results

3.6 Sensitive Information

We generally do not collect sensitive information unless it is reasonably necessary for a specific purpose and you have provided your consent. Where sensitive information is collected (for example, where a tenancy application includes health information relevant to a request for modifications), it will be handled with additional care in accordance with APP 3.3.

4. How We Collect Personal Information

We collect personal information by lawful and fair means, in accordance with APP 3. Wherever it is reasonable and practicable to do so, we collect personal information directly from you. This may occur when:

- You engage us to sell or manage your property
- You submit a tenancy application
- You attend a property inspection, open home or auction and sign our attendance register or provide your contact details
- You make an enquiry via our website, telephone, email or in person
- You enter into a contract of sale, lease, agency agreement or other agreement
- You correspond with us or provide documentation in the course of our services
- You provide us with your business card
- You interact with us on social media platforms, including Facebook, Instagram, LinkedIn and YouTube
- You complete surveys, provide feedback or participate in promotions
- We are required to photograph or video your property for marketing purposes
- We are required to verify your identity under AML/CTF legislation

In some circumstances, we may collect personal information about you from third parties, including:

- Referees nominated by you on tenancy applications
- Previous landlords, property managers or employers
- Tenancy database providers (e.g. TICA, NTD)
- Credit reporting agencies
- Government bodies and public registers (e.g. land title searches)
- Other real estate agents involved in a transaction
- Third-party property advertising portals
- Identity verification service providers (for AML/CTF compliance)
- Publicly available sources of information

Where we collect personal information about you from a third party, we will take reasonable steps to ensure you are made aware of that collection, the purpose of collection, and the matters set out in this policy.

5. Anonymity and Pseudonymity

Under APP 2, you have the right to deal with us anonymously or under a pseudonym where it is lawful and practicable for us to do so. For example, you may make a general enquiry about our services or the property market without providing your name.

However, in many circumstances it will not be practicable for us to deal with you anonymously or pseudonymously. For example, we cannot process a tenancy application, execute an agency agreement, facilitate a property transaction or comply with our AML/CTF identity verification obligations without knowing your identity. If you choose not to provide personal information that we reasonably require, we may be unable to provide you with the services you have requested.

6. Purposes for Which We Collect, Hold, Use and Disclose Personal Information

We collect, hold, use and disclose personal information only for purposes that are directly related to the provision of our real estate services, or for purposes that you would reasonably expect. These purposes include:

6.1 Property Sales

- Preparing and executing agency agreements, authorities to sell and contracts of sale
- Marketing the property, including on our website, social media and third-party portals
- Communicating with prospective purchasers, vendors and their legal representatives
- Conducting auctions and private sales
- Complying with vendor disclosure and due diligence obligations under the Sale of Land Act 1962 (Vic) and the Estate Agents Act 1980 (Vic)

6.2 Property Management

- Assessing tenancy applications and conducting reference and background checks
- Preparing and administering residential tenancy agreements under the Residential Tenancies Act 1997 (Vic)
- Collecting rent and issuing receipts
- Managing maintenance, repairs and routine inspections
- Lodging and claiming bonds with the Residential Tenancies Bond Authority (RTBA)
- Issuing notices (e.g. breach notices, notices to vacate) as required by law
- Representing landlords or tenants in VCAT proceedings

6.3 AML/CTF Compliance

- Verifying the identity of clients and beneficial owners in accordance with the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) (AML/CTF Act)
- Conducting ongoing customer due diligence
- Monitoring transactions for suspicious activity
- Reporting suspicious matters and threshold transactions to AUSTRAC
- Maintaining records as required under the AML/CTF Act and AML/CTF Rules

6.4 General Business Purposes

- Responding to enquiries and providing customer service
- Sending property alerts, market updates and marketing communications (with consent or where permitted under the Spam Act 2003)
- Internal record-keeping and business administration
- Monitoring and improving the quality and standard of our services
- Performing research and analysis about our services
- Complying with legal and regulatory obligations
- Resolving complaints and disputes
- Enforcing the terms and conditions of our engagement with you

We only collect personal information where you consent to the collection, or it is reasonably necessary for, or directly related to, the purposes outlined above or required by applicable law.

7. Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) Compliance

From 1 July 2026, real estate agents are designated service providers under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) (AML/CTF Act) and the Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No. 1) (AML/CTF Rules). We are required to comply with the obligations imposed on reporting entities under that legislation.

7.1 Customer Identification and Verification

Before providing designated services, including acting as an agent for the sale, purchase or transfer of real estate, we are required to verify your identity. This process is known as “Know Your Customer” (KYC) or “Customer Due Diligence” (CDD).

We may request one or more of the following forms of identification:

- A current Australian passport or foreign passport
- An Australian driver’s licence or proof of age card
- An Australian birth certificate or citizenship certificate
- A Medicare card, pension card or other government-issued card
- A recent utility bill, rates notice or bank statement as proof of address

For corporate clients, trusts and other legal entities, we may also require:

- Certificate of registration, ASIC extracts or trust deeds
- Identification of beneficial owners holding 25% or more ownership
- Information regarding the source of funds or source of wealth
- Details of authorised signatories and office holders

7.2 Ongoing Customer Due Diligence

We are required to conduct ongoing customer due diligence throughout the course of a transaction. This may include monitoring the transaction for consistency with our knowledge of the client and, where appropriate, requesting updated identification or further information.

7.3 Enhanced Due Diligence

In circumstances where we identify a higher risk of money laundering or terrorism financing, we may be required to conduct enhanced due diligence. This may include requesting additional identification, seeking information about the source of funds, or obtaining senior management approval before proceeding with the transaction.

7.4 Politically Exposed Persons (PEPs)

We are required to identify whether a client, or the beneficial owner of a client, is a Politically Exposed Person (PEP) as defined under the AML/CTF Act. If you are identified as a PEP, additional due diligence measures may apply.

7.5 Suspicious Matter Reporting

We are required by law to report suspicious matters to the Australian Transaction Reports and Analysis Centre (AUSTRAC). We are prohibited from disclosing to you, or any other person, that a suspicious matter report has been, or is being, prepared or submitted (a “tipping off” offence under section 123 of the AML/CTF Act).

7.6 Record Keeping

Under the AML/CTF Act, we are required to retain identification and verification records, transaction records and suspicious matter reports for a minimum of seven (7) years after the end of the relevant transaction or business relationship. This obligation overrides any shorter retention period that might otherwise apply under this Privacy Policy.

7.7 Your Obligation to Provide Information

If you refuse to provide identification or verification information required under the AML/CTF Act, we will be unable to provide you with the designated service. This is a legal obligation and is not discretionary. We are required to decline to act until satisfactory identification has been provided.

8. Disclosure of Personal Information

We may disclose personal information to third parties where it is reasonably necessary for the purposes described in this policy, or where we are required or authorised to do so by law. The third parties to whom we may disclose personal information include:

- Landlords and property owners (in respect of tenancy and property management matters)
- Vendors and purchasers (in respect of sale transactions)
- Tradespeople and contractors engaged to carry out maintenance or repairs
- Tenancy reference checking services and residential tenancy database operators
- Insurance providers
- Legal practitioners, conveyancers and settlement agents
- Government bodies and regulators, including Consumer Affairs Victoria, VCAT, the RTBA, the Australian Taxation Office and AUSTRAC
- Third-party property advertising platforms, including realestate.com.au and Domain

- Marketing and communications platforms used by us to distribute property information, market updates and promotional material (e.g. email marketing services, social media advertising platforms)
- Financial institutions (for direct debit authorisations and rent payment processing)
- Identity verification service providers (for AML/CTF compliance)
- Our professional advisors, including accountants and auditors
- Web hosting providers, IT systems administrators and data processors
- Mortgage brokers or financiers (where you have requested a referral)
- with the general public. If you submit content in a public forum, such as blog comments, social media posts, or other features of our services that are viewable by the general public and in doing so we may identify you by name to verify the authenticity of the interaction or to address the matters raised;
- to third parties to provide you a service you requested through a partnership or promotional offering made by a third party or us;

Any Third Parties to whom we disclose personal information may have their own privacy policies which govern how they use and handle that information. Once we have shared your information with those Third Parties in accordance with this policy, their privacy policies will govern the use of that information. We encourage you to review the privacy policies of any Third Parties with whom you interact.

8.1 Cross-Border Disclosure

We do not ordinarily disclose personal information to overseas recipients. In the event that we do (for example, if a client or service provider is based overseas), we will take reasonable steps to ensure the overseas recipient handles the information in accordance with the APPs, as required by APP 8. Our Website is hosted in Australia.

9. Direct Marketing

We may use your personal information to send you direct marketing communications about our services, property listings, market updates and events. We will only do so where:

- You have consented to receiving such communications; or
- You would reasonably expect to receive such communications given the nature of your interaction with us, and we provide a simple opt-out mechanism in each communication.

You may opt out of receiving direct marketing communications from us at any time by contacting us using the details in Section 20 of this policy, by using the unsubscribe facility in any electronic communication, or through our client preference centre. We will action your request within a reasonable period. We will not charge you for making such a request.

Please note that if you opt out, we may not be able to remove your personal information from the databases of Third Parties with whom we have already shared your personal information prior to the date of your opt-out request.

To the extent that our use of your personal information for direct marketing is based on your consent, you may withdraw that consent at any time in writing using the contact details in Section 20.

10. Cookies, Website Analytics and Social Media

Our website (shelterrealestate.com.au) uses cookies and similar tracking technologies to improve user experience and to analyse website traffic. Cookies are small text files stored on your device when you visit our website.

We use the following types of cookies:

- Essential cookies: necessary for the website to function correctly
- Analytics cookies: used to collect anonymised data about how visitors use our site (e.g. Google Analytics), including pages visited, time spent on site, and referral sources
- Marketing cookies: used by third-party advertising platforms to display relevant property listings and advertisements to you on other websites

You can control or disable cookies through your browser settings. Please note that disabling cookies may affect the functionality of our website. Where analytics cookies collect personal information, that information is handled in accordance with this policy.

10.1 Social Media Interactions

If you view a property listing on our website, you may enquire further by completing an online enquiry form or by authenticating your details through a social media account (e.g. Facebook or LinkedIn). If you choose to authenticate via a social media account, we may receive personal information linked to that account.

If you “like”, “follow” or interact with us on any social media platform, we may be able to view information on your social media profile, subject to your privacy settings on that platform.

10.2 Third-Party Websites

Our website may contain links to other internet sites that are external to us and operated by third parties. We have no direct control over the content or privacy practices of those linked sites. Third-party websites are responsible for informing you about their own privacy practices. Links to other sites are provided for convenience only and do not constitute endorsement. We disclaim all liability for any loss or damage arising from your use of linked third-party websites.

11. Storage and Security of Personal Information

We take reasonable steps to protect your personal information from misuse, interference, loss, unauthorised access, modification and disclosure, in accordance with APP 11.

The security measures we employ include:

- Secure electronic storage with access restricted to authorised personnel
- Password protection and access controls on our systems and devices
- Physical security measures for paper-based records, including locked filing cabinets and restricted access areas
- Staff training on privacy obligations and information handling procedures
- Use of secure cloud-based property management and CRM software with encryption
- Regular review of security practices

We cannot guarantee the security of personal information transmitted to us via the internet. Any personal information you transmit to us online is transmitted at your own risk.

Where we no longer require personal information for any purpose permitted under the APPs, and we are not required by law to retain it (including under the AML/CTF Act), we will take reasonable steps to destroy or de-identify the information in accordance with APP 11.2. There may be residual information that remains within our databases and records which will not be removed where retention is required by law or for legitimate record-keeping purposes.

12. Residential Tenancy Databases

In the course of our property management services, we may access or list personal information on residential tenancy databases in accordance with Part 10A of the Residential Tenancies Act 1997 (Vic).

Before listing your information on a residential tenancy database, we will:

- Provide you with written notice of our intention to list the information, and the database on which it will be listed
- Ensure the listing relates only to a breach of the residential tenancy agreement that has resulted in the tenant owing the landlord an amount greater than the bond
- Ensure the listing is accurate and up to date
- Ensure the listing complies with the requirements of the Residential Tenancies Act 1997 (Vic)

You have the right to request access to, and correction of, any personal information about you held on a residential tenancy database.

13. Unsolicited Personal Information

From time to time, we may receive personal information about you that we have not solicited or requested (for example, information provided by a third party in connection with a property transaction or tenancy application). In accordance with APP 4, if we determine that the information could not have been collected by us under APP 3, we will destroy or de-identify the information as soon as practicable, provided it is lawful and reasonable to do so.

14. Government Identifiers

In accordance with APP 9, we will not adopt, use or disclose a government-related identifier (such as a tax file number, Medicare number or driver's licence number) as our own identifier for you, unless the use or disclosure is reasonably necessary to verify your identity, is required or authorised by law (including under the AML/CTF Act), or is reasonably necessary for the purpose of fulfilling our obligations to a government agency.

15. Access to and Correction of Personal Information

Under APPs 12 and 13, you have the right to request access to the personal information we hold about you, and to request that we correct any information that is inaccurate, out of date, incomplete, irrelevant or misleading.

To request access to or correction of your personal information, please contact us using the details in Section 20 of this policy. We will respond to your request within 30 days. We will not charge you for making a request, but we may charge a reasonable fee for providing access to information in a particular form (for example, providing photocopies) if it is reasonable to do so.

For your protection, we may need to verify your identity before implementing your request. We will endeavour to comply with your request as soon as reasonably practicable.

We may refuse access in limited circumstances permitted by law. If we refuse access or decline to correct information, we will provide you with written reasons and information about how to make a complaint.

Please note that we may need to retain certain information for legal purposes (including AML/CTF record-keeping obligations), to complete transactions commenced prior to your request, or for legitimate record-keeping purposes.

16. Automated Decision-Making

Where we use any computer program or automated system to make, or substantially assist in making, a decision that could reasonably be expected to significantly affect your rights or interests, we will provide transparency about the use of such systems in accordance with our obligations under the Privacy Act 1988 (Cth), including the amendments introduced by the Privacy and Other Legislation Amendment (Enforcement and Other Measures) Act 2024.

As at the date of this policy, we do not use automated decision-making systems that make decisions that could reasonably be expected to significantly affect the rights or interests of individuals. If this changes, we will update this policy to include information about the kinds of personal information used and the kinds of decisions made by such systems.

17. Notifiable Data Breaches

In accordance with Part III C of the Privacy Act 1988 (Cth) (the Notifiable Data Breaches scheme), if we become aware of a data breach that is likely to result in serious harm to any individual to whom the information relates, we will:

- Take reasonable steps to contain the breach and mitigate any potential harm
- Assess whether the breach is likely to result in serious harm to affected individuals
- If the breach is an “eligible data breach”, notify the Office of the Australian Information Commissioner (OAIC) and affected individuals as soon as practicable
- Include in our notification a description of the breach, the kind of information involved, and recommendations about the steps individuals should take in response

We maintain an internal data breach response plan and take all reasonable steps to prevent, detect and respond to data breaches. If you believe that a data breach has occurred in relation to your personal information held by us, please contact us immediately using the details in Section 20.

18. Photography, Videography and Marketing Content

In the course of providing our services, we may engage professional photographers or videographers to create marketing content for properties we are selling or managing. Where

images or video recordings include identifiable individuals (for example, attendees at open homes or auctions), we will obtain your consent before using those images for marketing purposes.

Property photographs and videos may be published on our website, social media platforms, third-party property portals and in print materials. If you do not wish to appear in marketing content, please notify us at the relevant inspection or event.

19. Children and Minors

We do not knowingly solicit or collect personal information from individuals under the age of 18 years. If we discover that we have received personal information from a Minor, we will take reasonable steps to delete that information from our systems promptly. A Minor's parent or legal guardian may request that the Minor's personal information be corrected or deleted by contacting us using the details in Section 20.

20. Non-Personal and Aggregated Information

We may collect non-personal information about how you interact with our website, including which pages are most frequently visited, how long the website is used, and associated aggregated usage data. This information does not identify you personally and is used to improve our website and services. We may share aggregated, non-personal information with our agents, consultants and employees for the purpose of analysing and improving our services.

21. Complaints

If you believe that we have breached your privacy or handled your personal information in a manner that is not in accordance with this policy or the APPs, you may lodge a complaint by contacting us using the details in Section 22.

We will acknowledge receipt of your complaint within 7 days and will investigate and respond to your complaint within 30 days. If we need additional time, we will notify you and provide an estimated timeframe for our response. We will treat all complaints confidentially, save that we may provide a copy of your complaint to any affected party for their comment where necessary to properly investigate the issues raised.

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

Organisation	Office of the Australian Information Commissioner
Website	www.oaic.gov.au
Phone	1300 363 992
Email	enquiries@oaic.gov.au
Post	GPO Box 5218, Sydney NSW 2001

22. How to Contact Us

If you have any questions about this Privacy Policy, wish to make a request regarding your personal information, wish to withdraw consent, or wish to lodge a complaint, please contact us:

Privacy Officer	The Privacy Officer
Entity	Shelter Property Group Pty Ltd
Trading As	Shelter Real Estate
Address	1180 Toorak Road, Camberwell VIC 3124
Phone	03 9889 3990
Email	compliance@shelterrealestate.com.au
Website	shelterrealestate.com.au

23. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, legislative requirements, or regulatory guidance. The current version of this policy will always be available on our website and from our offices. We encourage you to review this policy periodically.

Where we make material changes to this policy, we will take reasonable steps to notify affected individuals, including by publishing a notice on our website.