

Privacy Policy

Rangecrest Real Estate Pty Ltd trading as Elders Real Estate Gatton

Effective Date: August 2026

1. Introduction

Rangecrest Real Estate Pty Ltd trading as **Elders Real Estate Gatton** respects your privacy and is committed to protecting the personal information we collect, hold, use and disclose.

This Privacy Policy explains how we manage personal information in connection with our real estate sales, property management, leasing, appraisals, marketing, website and related services.

We handle personal information in accordance with applicable Australian privacy laws, including the **Privacy Act 1988 (Cth)** and the **Australian Privacy Principles (APPs)**, where applicable.

We are also subject to obligations under the **Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) (AML/CTF Act)** in relation to designated services provided by our business.

This Policy explains:

- what personal information we collect;
- why we collect it;
- how we use, disclose, store and protect it;
- how personal information may be collected and used to meet our AML/CTF obligations;
- how you can access or correct your personal information; and
- how you can make a privacy complaint.

2. What Personal Information We Collect

The personal information we collect will depend on your dealings with us and may include:

- your name, residential or postal address, email address and telephone number;
- date of birth and identification information where reasonably required;
- details relating to properties you own, rent, wish to purchase, sell, lease or have appraised;
- information provided when making a property, sales, rental or appraisal enquiry;
- information provided when attending an open home, inspection or auction;
- rental application, tenancy and rental history information;
- employment, income and reference information where relevant to a tenancy application;
- financial information, including bank account or payment details where reasonably required;
- information relating to property ownership, contracts, transactions and communications with us;
- identification and other information required to comply with applicable legal or regulatory obligations;
- information required for customer due diligence and identity verification under AML/CTF laws where applicable;
- correspondence, enquiries, feedback and other information you provide to us; and

- information collected through our website, including IP address, browser information, website usage information and cookies.

We generally collect personal information directly from you. However, where appropriate and lawful, we may also collect information from third parties including property owners, tenants, prospective tenants or purchasers, referees, previous property managers or lessors, employers, identity verification providers, service providers, publicly available sources, government agencies or other parties involved in a property transaction.

We will only collect sensitive information where it is reasonably necessary for our functions or activities and where you consent, or where collection is otherwise permitted or required by law.

3. Why We Collect Personal Information

We collect personal information where it is reasonably necessary to conduct our business and provide our real estate services.

We may collect information to:

- respond to property, sales, rental and appraisal enquiries;
- market, sell, purchase, lease and manage properties;
- process and assess tenancy applications;
- verify the identity and information provided by applicants and clients;
- manage residential tenancies and communicate with landlords and tenants;
- conduct property inspections, open homes, auctions and appraisals;
- prepare and administer contracts, agreements and other property-related documentation;
- process rental payments, deposits and other transactions;
- communicate with clients, customers, prospective buyers, sellers, landlords and tenants;
- arrange maintenance, repairs and services relating to managed properties;
- provide information about properties, services or market activity that may be relevant to you;
- maintain accurate business and client records;
- improve our services, systems and website;
- manage complaints and enquiries;
- comply with our AML/CTF obligations where applicable;
- meet our other legal, regulatory, insurance and professional obligations; and
- protect our legitimate business interests and those of our clients.

If you choose not to provide information that we reasonably require, we may be unable to provide you with certain services, process an application or proceed with a property transaction.

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

From **1 July 2026**, certain services provided by real estate professionals are regulated under Australia's anti-money laundering and counter-terrorism financing laws.

Where **Rangecrest Real Estate Pty Ltd trading as Elders Real Estate Gatton** provides a service to which the AML/CTF Act applies, we may be required to collect, verify, use, retain and disclose personal information for the purposes of complying with our legal obligations.

Information We May Collect

Depending on the circumstances, we may collect information including:

- your full legal name;
- residential address;
- date of birth;
- contact details;
- government-issued identification information;
- copies or details of identification documents;
- information and documents used to verify your identity;
- information about the nature and purpose of your relationship or transaction with us;
- information about the ownership or control of companies, trusts, partnerships or other entities;
- information identifying beneficial owners, trustees, directors, partners, authorised representatives or other relevant persons;
- information about persons on whose behalf you may be acting;
- information relevant to assessing money laundering, terrorism financing or proliferation financing risk;
- information regarding the source of funds or source of wealth where required having regard to applicable AML/CTF obligations and risk;
- information relevant to politically exposed person (PEP) or sanctions screening;
- transaction and property information; and
- other information we are required or permitted to collect under AML/CTF laws.

Identity Verification and Customer Due Diligence

We are required to undertake **customer due diligence (CDD)** in circumstances prescribed by the AML/CTF Act and Rules.

This may include verifying your identity and, where applicable, identifying and verifying beneficial owners, persons acting on behalf of a customer and other relevant persons.

Use of AMLHUB for Customer Due Diligence

Rangecrest Real Estate Pty Ltd trading as Elders Real Estate Gatton uses AMLHUB Australia Pty Ltd (AMLHUB) as an outsourced AML/CTF service provider to assist us with customer due diligence (CDD), Know Your Customer (KYC) and identity verification processes.

Where AML/CTF verification is required, we may provide your personal information to AMLHUB, or arrange for you to provide information directly through the AMLHUB platform or verification process.

Information processed through AMLHUB may include:

- your name, address, date of birth and contact information;
- government-issued identification information and documents;
- photographs or other information required for identity verification;
- information about beneficial owners, representatives and persons acting on behalf of a customer;
- information about companies, trusts, partnerships or other entities associated with a transaction;
- information required to undertake PEP, sanctions or other AML/CTF screening;

- information relating to the nature and purpose of the customer relationship;
- source of funds or source of wealth information where required;
- information relevant to the assessment of AML/CTF risk; and
- other information reasonably required to undertake CDD and meet our AML/CTF obligations.

AMLHUB may use electronic verification services, databases and other service providers to verify information and conduct relevant checks.

AMLHUB processes this information as a service provider to Rangecrest Real Estate Pty Ltd for the purpose of assisting us to meet our AML/CTF obligations.

Information provided to AMLHUB is subject to applicable privacy and data protection requirements and the contractual arrangements between Rangecrest Real Estate Pty Ltd and AMLHUB.

Further information about AMLHUB's handling of information and its services is available from **AMLHUB Australia**.

Our Responsibility for Outsourced AML/CTF Functions

Although we use AMLHUB to perform or assist with certain AML/CTF functions, **Rangecrest Real Estate Pty Ltd remains responsible for complying with its obligations under the AML/CTF Act and Rules.**

Our use of AMLHUB does not transfer our legal responsibility for customer due diligence, record keeping or other applicable AML/CTF obligations to AMLHUB.

We maintain oversight of our outsourced AML/CTF arrangements and take reasonable steps to ensure our service providers are appropriate for the functions they perform.

AML/CTF Screening and Risk Assessment

Information collected by us or processed on our behalf through AMLHUB may be used to assess and manage money laundering, terrorism financing and proliferation financing risks.

This may include checks against relevant databases and information sources and screening for matters such as politically exposed person status and applicable sanctions.

Where required by law or appropriate having regard to the assessed risk, we may request additional information or supporting documentation.

Reporting and Disclosure to AUSTRAC

The AML/CTF Act may require or permit us to disclose information to the **Australian Transaction Reports and Analysis Centre (AUSTRAC)** and other authorised government or law enforcement bodies.

This may include information contained in reports that we are legally required to make, including **suspicious matter reports** and other reports required under AML/CTF legislation.

There may be circumstances where the law restricts what we are permitted to tell you about an AML/CTF report, investigation, assessment or disclosure.

AML/CTF Record Keeping

We are required to create and retain certain records relating to our AML/CTF obligations.

These records may be held by us or, where appropriate, through systems or service providers used by us, including AMLHUB.

Records may include:

- customer due diligence and identity verification records;
- records relating to beneficial ownership and persons acting on behalf of customers;
- AML/CTF risk assessments and related records;
- transaction records;
- records relating to designated services; and
- other records required by AML/CTF legislation.

These records will be retained for the period required by law, which is **generally at least seven years**, depending on the type of record and the circumstances.

If You Do Not Provide Required Information

Where we are required to obtain or verify information under AML/CTF laws and you do not provide sufficient information or documentation, we may be unable to commence or continue providing the relevant service or proceed with a transaction.

In some circumstances, we may also be required to undertake additional due diligence, delay or decline to provide a service, or take other action required or permitted by law.

5. How We Use and Disclose Personal Information

We generally use personal information for the purpose for which it was collected or for a related purpose that you would reasonably expect.

Depending on the services we provide, we may disclose relevant personal information to:

- property owners, landlords, vendors, purchasers and tenants;
- prospective buyers or tenants where appropriate;
- solicitors, conveyancers, accountants and financial institutions;
- tradespeople, contractors and maintenance providers;
- body corporate or community management providers;
- utility and property service providers;
- insurers and insurance representatives;
- tenancy database or screening providers where permitted by law;
- **AMLHUB Australia Pty Ltd and other identity verification, CDD, AML/CTF screening and compliance service providers engaged by us;**
- technology, software, cloud storage, website and other service providers;
- Elders network entities and service providers where reasonably necessary in connection with the services we provide;
- AUSTRAC and other government or regulatory authorities where required or authorised by law;
- courts, tribunals and law enforcement agencies where required or authorised by law; and

- other parties where you have authorised us to disclose the information.

We do not sell personal information to third parties.

6. Direct Marketing

Where permitted by law, we may use your contact information to provide you with information about:

- properties for sale or lease;
- property market activity;
- appraisal opportunities;
- our real estate and property management services;
- newsletters and market updates;
- competitions, promotions or community activities; and
- other information we reasonably believe may be relevant to you.

You may ask us to stop sending direct marketing communications at any time.

Where electronic marketing includes an unsubscribe facility, you can use that facility to opt out. You can also contact Elders Real Estate Gatton directly and request that your details no longer be used for direct marketing.

7. Website Information and Cookies

When you visit our website, certain technical information may be collected automatically, including your IP address, browser type, date and time of your visit, pages viewed and information about how you interact with the website.

Our website may use cookies and analytics services to understand website traffic, improve functionality and provide a better online experience.

Cookies are small data files stored on your device. You can generally configure your browser to reject or restrict cookies; however, doing so may affect some website functionality.

Third-party services used in connection with our website may also collect information in accordance with their own privacy policies.

8. How We Store and Protect Personal Information

Personal information may be held electronically or in hard-copy records, including through systems and service providers used by us to provide our services and meet our regulatory obligations.

We take reasonable steps to protect personal information from:

- misuse;
- interference;
- loss;
- unauthorised access;
- unauthorised modification; and
- unauthorised disclosure.

These measures may include secure software and property management systems, password and access controls, secure document storage, staff procedures, data security measures and the use of reputable technology and service providers.

Access to personal information is restricted to staff, contractors and service providers who reasonably require access to perform their duties or provide services.

Personal information used for AML/CTF purposes may be processed or stored using **AMLHUB's systems and services** and those of verification or technology providers used in connection with those services.

Some technology, software, cloud storage, identity verification or other service providers may store or process information using systems located outside Australia. Where applicable, we take reasonable steps to ensure personal information is handled appropriately and in accordance with applicable privacy requirements.

We retain personal information for as long as reasonably necessary for the purpose for which it was collected and to satisfy our legal, regulatory and record-keeping obligations, including applicable AML/CTF record-keeping requirements.

When personal information is no longer required and we are not legally required to retain it, we will take reasonable steps to securely destroy or de-identify it.

9. Accuracy of Personal Information

We take reasonable steps to ensure the personal information we collect, hold, use and disclose is accurate, complete, up to date and relevant for the purpose for which it is being used.

We also rely on individuals to provide us with accurate information and to notify us if their details change.

10. Accessing Your Personal Information

You may request access to personal information that **Rangecrest Real Estate Pty Ltd trading as Elders Real Estate Gatton** holds about you.

This includes personal information processed on our behalf by service providers such as AMLHUB, subject to applicable legal restrictions.

Before providing access, we may need to verify your identity.

We will generally provide access within a reasonable period, subject to any exceptions permitted or required by law.

In some circumstances, legal requirements may prevent or restrict us from providing access to particular information. If we are unable to provide access to all or part of the information requested, we will explain the reason where we are legally permitted to do so.

Requests for access should be made directly to **Elders Real Estate Gatton**.

11. Correcting Your Personal Information

You may ask us to correct or update personal information if you believe the information we hold about you is:

- inaccurate;
- incomplete;
- out of date;
- irrelevant; or
- misleading.

We will take reasonable steps to correct information where appropriate, including where relevant information is processed on our behalf by a service provider.

If your contact details or other relevant information changes, we encourage you to notify Elders Real Estate Gatton so that our records can be updated.

12. Privacy Complaints

If you believe that we have not handled your personal information appropriately or have not complied with our privacy obligations, you may make a complaint to **Rangecrest Real Estate Pty Ltd trading as Elders Real Estate Gatton**.

This includes concerns about personal information provided to or processed by a service provider acting on our behalf, including AMLHUB.

Please provide sufficient information about your concern to allow us to investigate the matter.

We will:

1. acknowledge your complaint;
2. review the circumstances surrounding the complaint;
3. investigate the matter where necessary; and
4. respond to you within a reasonable timeframe.

We will endeavour to resolve privacy concerns directly and fairly.

If you are not satisfied with our response, you may be entitled to lodge a complaint with the **Office of the Australian Information Commissioner (OAIC)**.

13. Data Breaches

If we become aware of unauthorised access to, disclosure of, or loss of personal information, we will assess the incident and take appropriate steps to contain and manage it.

Where a data breach is likely to result in serious harm and notification is required under the **Notifiable Data Breaches scheme**, we will notify affected individuals and the Office of the Australian Information Commissioner as required by law.

14. Third-Party Websites

Our website may contain links to websites or online services operated by third parties.

We are not responsible for the privacy practices, security or content of external websites. We recommend reviewing the privacy policy of any third-party website or service before providing personal information.

15. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes to our business practices, technology, services or legal and regulatory obligations.

The most current version of this Privacy Policy will be made available on our website.

16. Contact Us

For questions about this Privacy Policy, to request access to or correction of your personal information, to opt out of direct marketing, or to make a privacy complaint, please contact:

Rangecrest Real Estate Pty Ltd
Trading as Elders Real Estate Gatton

Elders Real Estate Gatton

Please contact our office using the telephone, email or contact details published on our website.

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