



**PENTON**  
PROPERTY BUYER'S AGENCY

## PENTON PROPERTY BUYER'S AGENCY

ABN 52 668 233 832

Licence No. 20486431

### Privacy Policy

Version 2.0 - April 2026

#### 1. Introduction

Penton Property Buyer's Agency ("**we**", "**us**" or "**our**") is a property buyer's agency that works with purchasers to find and acquire property to meet their investment or owner-occupier needs. We are committed to protecting the privacy and security of the personal information we collect and hold.

This Privacy Policy sets out how we collect, use, disclose, store and otherwise handle personal information in accordance with the *Privacy Act 1988* (Cth) ("**Privacy Act**") and the thirteen Australian Privacy Principles ("**APPs**") contained in Schedule 1 of that Act. An overview of the APPs and how they apply to our business is set out in section 2 below.

From 1 July 2026, our business will also be subject to obligations under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) ("**AML/CTF Act**") as a reporting entity. This Privacy Policy addresses the collection and handling of personal information required to meet those obligations, including the collection of sensitive information and government-related identifiers for customer due diligence and identity verification purposes. Further detail about our AML/CTF obligations and what they mean for you is set out in section 3.2.

We may update this Privacy Policy from time to time to reflect changes to our practices or legal requirements. The current version will always be available on our website at [www.pentonproperty.com](http://www.pentonproperty.com).

#### 2. The Australian Privacy Principles

The APPs regulate how organisations collect, hold, use and disclose personal information, and give individuals the right to understand why their personal information is being collected, how it will be used, and to whom it may be disclosed. The APPs also provide individuals with the right to access and correct their personal information.

The following is a summary of how the APPs apply to the way we handle personal information. Each APP is addressed in more detail in the relevant sections of this Policy:

- (a) **APP 1 - Open and transparent management:** We manage personal information in an open and transparent way.
- (b) **APP 2 - Anonymity and pseudonymity:** Where practicable, we will give you the option of not identifying yourself, or of using a pseudonym, when dealing with us. However, this will not be possible where we are required by law to identify you, including under the AML/CTF Act.

- (c) **APP 3 - Collection of solicited personal information:** We only collect personal information that is reasonably necessary for, or directly related to, our functions and activities. We collect sensitive information only with your consent or where required or authorised by law.
- (d) **APP 4 - Dealing with unsolicited personal information:** If we receive personal information that we did not solicit, we will assess whether we could have collected it under APP 3. If not, we will destroy or de-identify the information as soon as practicable, provided it is lawful to do so.
- (e) **APP 5 - Notification of collection:** At or before the time we collect your personal information (or as soon as practicable afterwards), we will notify you of the matters set out in APP 5, including the purposes of collection and to whom it may be disclosed.
- (f) **APP 6 - Use or disclosure:** We will only use or disclose personal information for the purpose for which it was collected (the primary purpose), or for a secondary purpose where you would reasonably expect us to do so and that purpose is related to the primary purpose, or where you have consented, or where required or authorised by law.
- (g) **APP 7 - Direct marketing:** We will only use your personal information for direct marketing purposes where you would reasonably expect it, or where you have consented. You may opt out of receiving direct marketing at any time.
- (h) **APP 8 - Cross-border disclosure:** Before disclosing personal information to an overseas recipient, we take reasonable steps to ensure the recipient handles the information in accordance with the APPs.
- (i) **APP 9 - Adoption, use or disclosure of government-related identifiers:** We will not adopt, use or disclose a government-related identifier unless required to do so by law, or where an exception applies.
- (j) **APP 10 - Quality of personal information:** We take reasonable steps to ensure the personal information we collect, use and disclose is accurate, up-to-date, complete and relevant.
- (k) **APP 11 - Security of personal information:** We take reasonable steps to protect personal information from misuse, interference, loss, and unauthorised access, modification or disclosure. We destroy or de-identify personal information when it is no longer needed and we are not required by law to retain it.
- (l) **APP 12 - Access to personal information:** You have the right to request access to the personal information we hold about you, subject to certain exceptions.
- (m) **APP 13 - Correction of personal information:** You have the right to request that we correct personal information we hold about you that is inaccurate, out of date, incomplete, irrelevant or misleading.

### 3. Kinds of Personal Information We Collect

The types of personal information we collect depend on the nature of the services we provide to you and the stage of our engagement. Our collection falls into two broad categories.

#### 3.1 General Personal Information

In the course of providing our buyer's agency services, we collect a range of personal information that enables us to understand your requirements and act on your behalf. This may include:

- (a) your full name, residential and postal address, email address and telephone number;
- (b) your property purchase budget, property preferences and deal-breakers;
- (c) details of your current property portfolio, including loan balances, repayment amounts and property performance data;
- (d) lender pre-approval notifications and related finance information;

- (e) payment details for our services;
- (f) testimonials and feedback you provide to us;
- (g) photographs, videos and audio-visual recordings captured for testimonial purposes;
- (h) recordings of telephone calls and meetings made with your verbal consent;
- (i) device data, browser type, IP address and website usage data collected through analytics tools; and
- (j) any other information you provide in the course of our engagement.

### 3.2 Sensitive Information and AML/CTF Information

From 1 July 2026, buyer's agents and other real estate professionals in Australia will become reporting entities under the AML/CTF Act. This is the result of reforms commonly known as "Tranche 2", which extend Australia's anti-money laundering and counter-terrorism financing regime to professionals who act as intermediaries in property and financial transactions. The reforms recognise that the real estate sector can be exploited by criminals seeking to launder the proceeds of crime through property purchases.

As a reporting entity, we will be required to carry out customer due diligence before providing our services. In practical terms, this means that before we can begin acting on your behalf, we will need to verify your identity and, in some cases, collect information about how your property purchase will be financed and where those funds originate. This is a legal requirement and applies to all of our clients, regardless of the nature of the transaction.

Sensitive information is a subset of personal information that is afforded a higher level of protection under the Privacy Act. It includes (among other things) government-related identifiers and certain categories of information that may be collected during identity verification processes.

The types of sensitive information and government-related identifiers we may collect for AML/CTF purposes include:

- (a) government-issued photographic identification documents, such as your driver's licence or passport;
- (b) government-issued non-photographic identification documents, such as your birth certificate or citizenship certificate;
- (c) government-related identifiers, which may include your Medicare card number (where used as a secondary form of identification), tax file number or other government-issued reference numbers;
- (d) information about your source of funds, being the origin of the specific funds to be used for a property purchase;
- (e) information about your source of wealth, being the origin of your overall financial position and assets;
- (f) information about the beneficial ownership and control of any entity through which a property purchase is to be made, including company, trust or self-managed superannuation fund structures; and
- (g) information about whether you, or any beneficial owner of an entity associated with the transaction, are a politically exposed person or subject to targeted financial sanctions.

We will only collect sensitive information and government-related identifiers where it is reasonably necessary for our functions or activities and where we have your consent or are otherwise required or authorised by law to do so. Where information is collected for AML/CTF purposes, we are required by law to retain it for a minimum of seven years after the end of the relevant relationship or transaction.

## 4. How We Collect Personal Information

We generally collect personal information directly from you. This may occur through:

- (a) communications with you by telephone, SMS, email, in person or through online enquiry forms on our website;
- (b) our client onboarding process, including completion of our buyer's agent agreement and client briefing survey;
- (c) our property portfolio planning software, which captures details of your current portfolio and investment objectives;
- (d) customer due diligence and identity verification processes required under the AML/CTF Act (from 1 July 2026);
- (e) feedback surveys and testimonial requests;
- (f) recording of telephone calls and meetings, with your verbal consent, for quality assurance and record-keeping purposes; and
- (g) website cookies and analytics tools, as described further in section 10 of this Policy.

In some cases, we may collect personal information from third parties, such as your legal representatives, mortgage brokers or lender, or from publicly available sources such as land registries and the Australian Securities and Investments Commission. Where we collect personal information about you from a third party, we will take reasonable steps to ensure that you are made aware of this Policy.

If we receive unsolicited personal information that we could not have collected under APP 3, we will destroy or de-identify that information as soon as practicable, provided it is lawful and reasonable to do so.

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

We collect, hold, use and disclose your personal information for the following purposes:

- (a) to provide our buyer's agency services to you, including property search, evaluation, negotiation and acquisition;
- (b) to assess your property requirements, financial position and investment objectives;
- (c) to manage your account and our ongoing relationship with you;
- (d) to engage third-party service providers on your behalf in connection with a property purchase (see section 6);
- (e) to comply with our legal obligations, including under the AML/CTF Act, including customer due diligence, identity verification, ongoing monitoring, record-keeping and reporting to the Australian Transaction Reports and Analysis Centre (AUSTRAC);
- (f) to detect and prevent fraud, money laundering, terrorism financing and other criminal activity;
- (g) to send you marketing communications about our services (with your consent, or where you would reasonably expect to receive such communications);
- (h) to publish marketing content on our social media platforms, such as settlement announcements (we will not publish your name, contact details or property address without your express consent);
- (i) to prepare and provide settlement certificates to you following a successful property acquisition;
- (j) to improve our services, including through analytics and client feedback; and

- (k) for any other purpose disclosed to you at or before the time of collection, or to which you have consented.

We will only use or disclose your personal information for a purpose other than the primary purpose of collection where a permitted exception under the Privacy Act applies.

## 6. Disclosure of Personal Information to Third Parties

In the course of providing our services, we may disclose your personal information to the following categories of third parties:

- (a) **Legal service providers:** solicitors and conveyancers engaged to act on your behalf in connection with a property purchase;
- (b) **Property service providers:** property managers, quantity surveyors, and building and pest inspection companies engaged in connection with a property purchase;
- (c) **Technology service providers:** our customer relationship management platform (Zoho), Microsoft (cloud storage), Canva (document design), Google (Google Docs and cloud storage), Anthropic (Claude AI), Apple (iPhone contact storage), Sync (file storage), WhatsApp (messaging), Facebook (social media), and property research platforms including SuburbsFinder, Htag and Gameplans;
- (d) **Telecommunications providers:** Optus, as our business telephone service provider;
- (e) **Compliance service providers:** external record management, audit and compliance service providers that we may engage to support our AML/CTF obligations;
- (f) **Government and regulatory bodies:** AUSTRAC, law enforcement agencies or other government bodies where we are required or authorised by law to disclose information; and
- (g) **Professional advisers:** our own legal, accounting or other professional advisers, where reasonably necessary.

When we disclose personal information to third-party service providers, we take reasonable steps to ensure those providers handle your information consistently with the APPs and this Policy.

## 7. Overseas Disclosure of Personal Information

A number of the third-party technology service providers we use store and process data on servers located outside Australia. In particular, Zoho, Microsoft, Canva, Google and other cloud-based platforms maintain servers in countries including (but not limited to) the United States, Canada, India, the European Union and Singapore. As a result, your personal information may be disclosed to overseas recipients in those countries.

Before disclosing personal information to an overseas recipient, we take reasonable steps to ensure that the overseas recipient does not breach the APPs in relation to that information, or that a relevant exception under APP 8 applies. We will update this Policy if we become aware of any material change to the countries in which our service providers store personal information.

## 8. Government-Related Identifiers

We may collect government-related identifiers, such as driver's licence numbers, passport numbers and Medicare card numbers, where required for identity verification as part of our AML/CTF obligations. In accordance with APP 9, we will not adopt a government-related identifier as our own identifier for you, and we will not use or disclose a government-related identifier except where:

- (a) it is reasonably necessary for us to verify your identity in connection with our services or AML/CTF obligations;

- (b) the use or disclosure is required or authorised by or under an Australian law or court order; or
- (c) a prescribed exception under the Privacy Act applies.

## 9. Marketing and Communications

We may use your personal information to send you marketing communications about our services, such as email newsletters, market updates and property-related content. In accordance with APP 7, we will only do so where you would reasonably expect to receive such communications from us, or where you have consented.

You may opt out of receiving marketing communications at any time by contacting us at the details set out in section 15 of this Policy, or by using the unsubscribe function in our emails. We will give effect to your request within a reasonable period.

We may also create and publish marketing content on our social media channels to celebrate successful property settlements. These posts will not include your name, contact details or property address unless you have provided your express consent.

We may also prepare and provide you with a settlement certificate following a successful property acquisition. Settlement certificates contain your name and the property address and are provided directly to you. We will not share your settlement certificate with any third party without your express consent.

## 10. Website, Cookies and Analytics

Our website may use cookies and analytics tools to collect information about how visitors use the site. This information may include your IP address, browser type, pages visited and time spent on the site. We currently use Zoho for website tracking and social media analytics functionality.

Cookies are small data files placed on your device that help us improve your experience and understand website usage patterns. You can manage your cookie preferences through your browser settings. Disabling cookies may affect the functionality of our website.

Where our analytics tools are provided by third parties, those providers may collect and process data in accordance with their own privacy policies. We encourage you to review the privacy policies of those providers.

## 11. Data Quality and Security

In accordance with APPs 10 and 11, we take reasonable steps to ensure that the personal information we collect, use and disclose is accurate, up-to-date, complete and relevant. If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us so we can take reasonable steps to correct it.

We take reasonable steps to protect personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure. Our security measures include:

- (a) password-protected access to our CRM system and cloud storage platforms;
- (b) restricting access to personal information to authorised personnel only;
- (c) using reputable, commercially available cloud-based platforms with industry-standard security measures; and
- (d) securely storing physical documents containing personal information.

Where we no longer need personal information for any purpose for which it may be used or disclosed under the Privacy Act, and we are not required by law to retain it (including under AML/CTF record-keeping obligations), we will take reasonable steps to destroy or de-identify the information.

## 12. AML/CTF Record-Keeping

As a reporting entity under the AML/CTF Act from 1 July 2026, we are required to create and retain records relating to our customer due diligence processes, identity verification, transaction monitoring and compliance activities. These records must be kept for a minimum of seven years after the end of the relevant relationship or transaction. This obligation applies in addition to, and may override, any request to delete personal information under this Policy.

We are also required under the AML/CTF Act to report certain matters to AUSTRAC, including suspicious matter reports and (where applicable) threshold transaction reports. The AML/CTF Act contains strict confidentiality provisions known as "tipping off" offences, which mean we are unable to inform you if a report has been made to AUSTRAC in connection with your affairs.

## 13. Notifiable Data Breaches

Under Part IIIC of the Privacy Act, we are required to notify affected individuals and the OAIC if we experience an eligible data breach that is likely to result in serious harm to any individuals whose personal information is involved. An eligible data breach occurs where there is unauthorised access to, or unauthorised disclosure of, personal information held by us, or where personal information is lost in circumstances where unauthorised access or disclosure is likely to occur.

If we become aware of a suspected eligible data breach, we will promptly assess the situation and, where required, notify affected individuals and the OAIC as soon as practicable. Our notification will include a description of the breach, the types of information involved, and recommendations about the steps you should take in response.

## 14. 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 make a request, please contact us using the details in section 15. We will respond within a reasonable period (and in any event within 30 days). We may charge a reasonable fee for providing access where permitted by the Privacy Act.

In certain circumstances, we may refuse to provide access to personal information. For example, we may refuse access where providing the information would be unlawful, where it relates to existing or anticipated legal proceedings, or where it would prejudice enforcement activities conducted by or on behalf of an enforcement body. If we refuse a request, we will provide you with written reasons for the refusal.

Where personal information has been collected for the purposes of our AML/CTF obligations, we may be limited in our ability to amend or delete that information where doing so would be inconsistent with our record-keeping obligations under the AML/CTF Act.

## 15. How to Contact Us

If you have any questions about this Privacy Policy, wish to request access to or correction of your personal information, or wish to make a complaint about how we have handled your personal information, please contact us:

### **Peta Golla**

Penton Property Buyer's Agency

Email: [peta@pentonproperty.com](mailto:peta@pentonproperty.com)

Phone: 0412 166 188

Website: [www.pentonproperty.com](http://www.pentonproperty.com)

We will acknowledge receipt of any complaint within 5 business days and provide you with a written response within 30 days, setting out the outcome of our investigation and any steps we intend to take. If you are not satisfied with our response, you may lodge a complaint with the Office of the Australian Information Commissioner ("OAIC"):

### **Office of the Australian Information Commissioner**

GPO Box 5218, Sydney NSW 2001

Phone: 1300 363 992

Website: [www.oaic.gov.au](http://www.oaic.gov.au)