

Privacy Policy

White Property
Effective date: 30 July 2026

1. About this policy

White Property is the trading name of Winston White & Co Pty Ltd as trustee for the Winston White Family Trust (ABN 69 635 866 286) ("White Property", "we", "us" or "our").

We respect your privacy and are committed to handling personal information openly and securely in accordance with the *Privacy Act 1988* (Cth), the Australian Privacy Principles and other applicable laws.

This policy explains how we collect, hold, use and disclose personal information in connection with our real estate and property management services.

2. The personal information we collect

The personal information we collect depends on how you interact with us. It may include:

- your name, date of birth, address and contact details;
- identification documents and government-issued identifiers where reasonably required;
- employment, income, financial and banking information;
- rental applications, rental history, references and tenancy database information;
- details of landlords, tenants, occupants, guarantors, emergency contacts, contractors and suppliers;
- property ownership, insurance, leasing and management information;
- rent, bond, invoices, arrears, payment and trust-account records;
- tenancy correspondence, complaints, breach information and dispute records;
- maintenance requests, access arrangements, inspection reports, photographs and videos;
- information about pets, additional occupants and other matters relevant to a tenancy;
- website usage information, including IP address, browser information and cookies; and
- sensitive information, such as health or accessibility information, where it is reasonably necessary and collected with consent or otherwise permitted by law.

We will not ask for personal information that is not reasonably necessary for our functions or activities.

3. How we collect personal information

We generally collect personal information directly from you, including when you:

- contact us by telephone, email, website, social media or in person;
- complete a tenancy application, management agreement, inspection form or other document;
- use an owner or tenant portal;
- attend an inspection or apply for a property;
- enter into or perform a tenancy or property management agreement;
- request maintenance, make a payment or communicate with us about a property; or
- provide documents, photographs or other information to us.

We may also collect information from landlords, tenants, authorised representatives, referees, employers, previous agents or property managers, tenancy databases, government bodies, publicly available records, utilities, insurers, strata or community corporations, tradespeople and other service providers.

If you provide us with personal information about another person, you should ensure that you are authorised to do so and, where appropriate, make them aware of this policy.

Where lawful and practicable, you may deal with us anonymously or using a pseudonym. However, we will usually need to identify you to provide property management services, process a tenancy application, administer a tenancy or meet our legal obligations.

4. Why we collect, use and disclose personal information

We may collect, hold, use and disclose personal information to:

- provide property management, leasing and related real estate services;
- verify identity, ownership, authority and information supplied to us;
- assess tenancy applications and references;
- prepare, administer, renew and enforce agreements;
- collect and account for rent, bond and other payments;
- maintain trust, financial and tenancy records;
- arrange inspections, access, repairs, maintenance, safety checks and insurance matters;
- communicate with landlords, tenants, occupants, applicants, contractors and other relevant parties;
- manage arrears, breaches, complaints, disputes, debt recovery and tribunal proceedings;
- comply with licensing, trust-account, taxation, record-keeping and other legal obligations;
- protect the safety, security and lawful interests of people and property;
- manage our business, systems, quality assurance, insurance, professional advice and audits;
- respond to enquiries and complaints; and
- provide information about our services where permitted by law.

If we cannot collect information reasonably required for these purposes, we may be unable to provide our services, assess an application or manage a tenancy.

5. Who we may disclose personal information to

Where reasonably necessary for our services or permitted by law, we may disclose personal information to:

- landlords, tenants, occupants, applicants, guarantors and their authorised representatives;
- referees, employers and previous property managers;
- tradespeople, cleaners, photographers, inspectors and other contractors;
- utilities, insurers, brokers and strata or community corporation managers;
- banks, payment processors, accountants, auditors and trust-account service providers;
- lawyers, debt recovery providers and other professional advisers;
- tenancy database operators and identity or application verification providers;
- software, cloud storage, communications, website hosting and IT service providers;
- Consumer and Business Services, the South Australian Civil and Administrative Tribunal, Residential Bonds Online, courts, emergency services, regulators and other government bodies;
- another property manager where management is lawfully transferred; and
- any other person where you have consented, where you would reasonably expect the disclosure, or where disclosure is required or authorised by law.

We do not sell personal information.

6. Property photographs and inspection information

Inspection reports, photographs and videos may contain personal information. We use them only for legitimate purposes connected with managing, maintaining, documenting or marketing a property, resolving a dispute, meeting legal obligations or protecting the interests of relevant parties.

We take reasonable steps to avoid collecting or disclosing unnecessary personal information in property photographs and reports.

7. Direct marketing

We may use your contact details to provide information about services that may reasonably be of interest to you where permitted by law. You may opt out at any time by using the unsubscribe facility in a communication or by contacting us.

Transactional, tenancy and property-management communications are not marketing communications and may continue where required.

8. How we hold and protect personal information

We may hold personal information in electronic systems and, where necessary, in physical records. We use property management, document, email, accounting, website and cloud-based service providers, including PropertyMe and Forms Live.

We take reasonable steps to protect personal information from misuse, interference, loss and unauthorised access, modification or disclosure. These measures may include access controls, passwords, multi-factor authentication, staff and contractor confidentiality obligations, secure systems, backups and physical security.

No method of electronic transmission or storage is completely secure. If we become aware of a data breach, we will assess and respond to it in accordance with applicable law, including the Notifiable Data Breaches scheme where relevant.

9. Retention and destruction

We retain personal information for as long as reasonably required to provide our services, administer a tenancy, resolve disputes and comply with legal, licensing, taxation, trust-account, insurance and record-keeping obligations.

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

10. Overseas disclosure

Some technology and service providers we use may store, process or permit access to personal information outside Australia. At the date of this policy, personal information may be disclosed to or processed by recipients in the United States of America, including through services connected with PropertyMe.

Other providers may use overseas infrastructure or subcontractors. Where practicable, we will update this policy if the countries in which overseas recipients are likely to be located change materially.

Before disclosing personal information overseas, we take reasonable steps required by the Australian Privacy Principles to ensure that the recipient handles the information appropriately, unless an exception applies.

11. Automated systems

We may use software to organise records, perform calculations, verify or compare information, communicate with individuals and assist with tenancy and property management processes.

We do not currently arrange for a computer program to make final decisions, without meaningful human involvement, that could reasonably be expected to significantly affect an individual's rights or interests. We will update this policy if our practices change.

12. Accessing or correcting your personal information

You may request access to personal information we hold about you or ask us to correct information that is inaccurate, out of date, incomplete, irrelevant or misleading.

Please contact our Privacy Officer using the details below. We may need to verify your identity before processing a request. In some circumstances, the law may permit or require us to refuse access or correction. If that occurs, we will provide written reasons where required.

13. Privacy enquiries and complaints

If you have a privacy enquiry or believe we have not handled your personal information appropriately, please contact our Privacy Officer:

Privacy Officer

White Property
PO Box 13
Fullarton SA 5063
Phone: 0408 847 181
Email: whiteproperty@email.propertyme.com

Please provide enough information for us to understand and investigate your concern. We will acknowledge your complaint and aim to provide a substantive response within 30 days. If additional time is required, we will let you know.

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

- Website: www.oaic.gov.au
- Phone: 1300 363 992

14. Changes to this policy

We may update this policy from time to time to reflect changes to our practices, systems or legal obligations. The current version will be published on our website at www.whiteproperty.com.au, together with its effective date.