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DOMINIUM WEALTH

PRIVACY POLICY

Property Investment Advisory Services — Queensland, Australia

Queensland Real Estate Licence No. 4943806
Last Updated: 10 June 2025

OUR COMMITMENT: Dominium Wealth is committed to protecting your privacy and personal information with the highest standards of security and confidentiality. This Privacy Policy explains how we collect, use, store, disclose, and protect your personal information in accordance with the Privacy Act 1988 (Cth), the Australian Privacy Principles, the Spam Act 2003 (Cth), and the Do Not Call Register Act 2006 (Cth).

1. ABOUT THIS POLICY

1.1 This Privacy Policy applies to all personal information collected, held, used, or disclosed by Dominium Wealth Pty Ltd (ABN 88 677 335 143), holder of Queensland real estate agent Licence No. 4943806 ('we', 'us', 'our').

1.2 By engaging our services, using our website, or providing personal information to us, you consent to the collection, use, storage, and disclosure of your personal information as described in this Policy.

1.3 We may update this Policy at any time. The current version is always available on our website and on request. Continued engagement after notification of an update constitutes acceptance of the revised Policy.

1.4 This Policy applies to all individuals including clients, prospective clients, website visitors, referral partners, and any other person whose personal information we hold.

1.5 If you are under 18 years of age, you must obtain the consent of your parent or guardian before providing personal information to us.

2. WHAT PERSONAL INFORMATION WE COLLECT

2.1 Client and Prospective Client Information

We collect the following categories of personal information:

- Identity information: full legal name, date of birth, nationality, and copies of government-issued identification including passport, driver's licence, and proof of address;
- Contact information: residential and mailing addresses, telephone numbers, and email addresses;
- Financial information: income, assets, liabilities, employment status, investment objectives, risk tolerance, superannuation details, banking and loan details, credit history, and financial statements;
- Tax information: Tax File Number, ABN, and information required for foreign tax and FIRB obligations;
- Property information: existing property holdings, ownership structures, trust structures, and company ownership details;

- Communications: records of written and verbal communications including emails, letters, call notes, and meeting records;
- Transaction information: details of property transactions you have undertaken or are considering;
- Call recordings: where we record telephone calls for training, quality, or compliance purposes, we will inform you at the start of the call and obtain your consent to the recording.

2.2 Website and Digital Information

- IP address, device type, browser type, and operating system;
- Website usage data including pages visited, time spent, and referring pages;
- Enquiry and contact form submissions;
- Cookie and tracking data as described in Section 11.

2.3 Information from Third Parties

We may also collect personal information from:

- Vendors, developers, builders, and project marketers;
- Real estate agents and other licensed property professionals;
- Mortgage brokers, financial advisers, and accountants acting on your behalf;
- Credit reporting bodies and identity verification services;
- Government agencies and registers including land titles offices, ASIC, the ATO, and FIRB;
- Publicly available sources including company and property registers.

3. HOW WE COLLECT PERSONAL INFORMATION

3.1 We collect personal information:

- Directly from you in person, by telephone, by email, or in writing;
- When you complete an enquiry form, engagement letter, appointment document, or service agreement;
- Through our website including contact and enquiry forms;
- Via authorised third parties acting with your consent;
- From publicly available sources including government registers.

3.2 Where it is lawful and practicable, we collect personal information directly from you. If we collect information about you from a third party, we take reasonable steps to notify you as soon as practicable, as required by APP 5.

3.3 You are not obliged to provide all information we request. However, failure to provide requested information may limit our ability to provide the services, and where information is required for our AML/CTF obligations we may be unable to proceed with an engagement without it.

4. HOW WE USE YOUR PERSONAL INFORMATION

4.1 We collect and use personal information for the following primary purposes:

- To verify your identity and comply with our obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth);
- To provide property investment advisory and property sourcing services under a written engagement;
- To understand your financial circumstances, investment objectives, and risk profile so we can identify suitable opportunities;
- To communicate with you regarding your engagement and the services;
- To prepare research, analysis, and recommendations relevant to your circumstances;
- To introduce you to vendors, developers, and other professionals where you have asked us to do so;
- To administer our internal records and business operations;
- To comply with our legal, regulatory, and licence obligations under the Property Occupations Act 2014 (Qld) and other applicable legislation;
- To manage, investigate, and resolve complaints and disputes.

4.2 We may also use your information for the following secondary purposes, subject to your consent or where otherwise permitted by the Australian Privacy Principles:

- To send you marketing communications about our services, property market updates, and investment opportunities (see Sections 8 and 9 — you may opt out at any time);
- For internal research, business development, and service improvement;

- To prepare anonymised, aggregated, non-identifiable data for statistical and market analysis.

4.3 We will not use or disclose your personal information for a purpose other than that for which it was collected unless: (a) you have consented; (b) you would reasonably expect us to do so and the secondary purpose is related to the primary purpose; (c) we are required or authorised by law; or (d) it is necessary to lessen or prevent a serious threat to life, health, or safety.

4.4 We will not use your Tax File Number for any purpose other than tax-related matters as permitted by the Income Tax Assessment Act 1997 (Cth) and the Taxation Administration Act 1953 (Cth).

5. DISCLOSURE OF PERSONAL INFORMATION

5.1 Authorised Disclosures

We may disclose your personal information to:

- Our employees, officers, salespersons, and contractors who need the information to perform their duties, subject to confidentiality obligations;
- Vendors, developers, and their agents, where you have asked us to introduce you to a property or where introduction is necessary to progress a transaction you have authorised;
- Legal practitioners, conveyancers, and settlement agents involved in a transaction you have authorised;
- Professional advisers including solicitors, accountants, and financial planners, with your consent;
- Mortgage brokers, lenders, and financial institutions in connection with a property transaction you have authorised;
- Regulatory bodies, law enforcement agencies, and courts where required or authorised by law;
- AUSTRAC and other government agencies as required under our AML/CTF obligations;
- The Office of Fair Trading Queensland in connection with our obligations under the Property Occupations Act 2014 (Qld);
- Credit reporting bodies and identity verification providers for customer due diligence;
- Our professional indemnity insurers in connection with a claim or potential claim;
- A successor entity in the event of a business sale or merger, subject to confidentiality obligations.

5.2 Where we disclose your information to a vendor or developer, we do so only to the extent necessary to progress an introduction or transaction you have requested. We do not provide your full financial profile to a vendor without your express consent.

5.3 Prohibited Disclosures

We will NEVER:

- Sell, rent, or trade your personal information to third parties for their own marketing purposes;
- Disclose your personal information to unauthorised third parties without your consent;
- Use your personal information in a manner inconsistent with this Policy without first notifying you and obtaining your consent.

5.4 Overseas Disclosure

We do not routinely disclose personal information to overseas recipients. Where an overseas disclosure is necessary, for example where a cloud service provider stores data outside Australia, we take the reasonable steps required by APP 8 to ensure the overseas recipient handles your information consistently with the Australian Privacy Principles.

6. DATA SECURITY

SECURITY COMMITMENT: We implement technical, administrative, and physical safeguards designed to protect your personal information from misuse, interference, loss, and unauthorised access, modification, or disclosure, as required by APP 11.

6.1 Technical Security Measures:

- SSL/TLS encryption for data transmitted via our website and digital platforms;
- Encryption for sensitive communications and document transfer;
- Secure, encrypted cloud storage with access controls and multi-factor authentication;

- Regular security reviews and vulnerability assessments;
- Firewalls, endpoint protection, and threat monitoring;
- Session timeouts and enforced strong password policies;
- Encrypted backups with secure storage.

6.2 Administrative Security Measures:

- Role-based access controls limiting data access to those who require it;
- Staff privacy and data handling training on induction and at regular intervals;
- Confidentiality and privacy obligations imposed on all employees, contractors, and service providers;
- Documented data handling procedures, an incident response plan, and periodic security reviews;
- Due diligence on third-party service providers regarding their data security practices.

6.3 Physical Security Measures:

- Secured premises with restricted access;
- Secure destruction of physical documents containing personal information;
- Device management policies covering all equipment used to access personal information.

6.4 No method of electronic transmission or storage is completely secure. While we take the steps described above, we cannot guarantee absolute security. We will notify you and the Office of the Australian Information Commissioner promptly in the event of an eligible data breach under Part IIIC of the Privacy Act 1988 (Cth).

7. DATA BREACH RESPONSE

7.1 In the event of a suspected or actual data breach, we will immediately contain the breach, assess its scope, and where it is an eligible data breach, notify the Office of the Australian Information Commissioner as soon as practicable and in any event within 30 days of becoming aware of it.

7.2 Where a breach is likely to result in serious harm, we will notify affected individuals as soon as practicable with information about: the nature of the breach; the kinds of information involved; the steps we have taken; and the steps we recommend individuals take in response.

7.3 We maintain a Data Breach Response Plan which is reviewed at least annually.

7.4 Where a third-party service provider we engage experiences a breach affecting your information, we require that provider to notify us promptly so we can meet our notification obligations.

8. TELEPHONE MARKETING AND THE DO NOT CALL REGISTER

8.1 We comply with the Do Not Call Register Act 2006 (Cth) and the Telecommunications (Do Not Call Register) (Telemarketing and Research Calls) Industry Standard 2017.

8.2 We wash all telemarketing call lists against the Do Not Call Register maintained by the Australian Communications and Media Authority at least once every 30 days before making any unsolicited marketing calls.

8.3 We do not make unsolicited telemarketing calls to numbers on the Do Not Call Register unless we have prior express consent from the account holder, or a permitted existing business relationship applies.

8.4 Marketing calls are made only during permitted hours in the recipient's local time: Monday to Friday 9:00 am to 8:00 pm, and Saturday 9:00 am to 5:00 pm. We do not make marketing calls on Sundays or public holidays.

8.5 At the start of every marketing call we identify ourselves, the business on whose behalf the call is made, and the purpose of the call, and we provide contact details on request.

8.6 You may withdraw consent to marketing calls at any time by telling us during a call or by notifying us in writing. We will action your request within 5 business days.

8.7 Where we engage third parties to make marketing calls on our behalf, we remain responsible for ensuring they comply with this Section and all applicable laws.

9. ELECTRONIC MARKETING — SPAM ACT COMPLIANCE

9.1 We send commercial electronic messages only in compliance with the Spam Act 2003 (Cth) and the Spam Regulations 2021 (Cth).

9.2 We send marketing messages only to recipients who have given prior express consent, or where consent may lawfully be inferred. We do not infer consent merely because an electronic address has been published.

9.3 All marketing messages clearly identify us as the sender, including our legal and trading name, and include accurate contact information that remains valid for at least 30 days after sending.

9.4 All marketing messages include a clear, functional, and easy-to-use unsubscribe facility. Unsubscribing does not require you to log in to an account or provide personal information beyond your electronic address.

9.5 We action all unsubscribe requests within five (5) business days and send no further marketing messages to that address afterwards. We will not contact you to encourage you to resubscribe.

9.6 We maintain records of consent obtained for electronic marketing, including the date, method, and scope of consent, for at least two (2) years after the marketing relationship ends.

10. DATA RETENTION AND DESTRUCTION

10.1 We retain personal information only for as long as necessary for the purposes for which it was collected, or as required by law, whichever is longer.

10.2 Retention periods applicable to our business include:

- Client identification, appointment, and AML/CTF records: 7 years from the end of the business relationship, as required by the AML/CTF Act 2006 (Cth) and the Property Occupations Act 2014 (Qld);
- Financial and transaction records: 7 years from the end of the relevant financial year, as required by the Income Tax Assessment Act 1997 (Cth);
- Property transaction records and engagement correspondence: 7 years from completion or termination of the engagement;
- Electronic marketing consent records: 2 years from the end of the marketing relationship;
- Prospective client records where no engagement proceeds: 2 years from the date of last contact.

10.3 On expiry of the applicable retention period, personal information is securely destroyed or irreversibly de-identified using methods appropriate to the medium, in accordance with APP 11.2.

10.4 If you ask us to delete your personal information, we will comply to the extent we are not legally required to retain it. We will tell you what we must retain and the legal basis for retaining it.

11. COOKIES AND WEBSITE TRACKING

11.1 Our website uses cookies and similar technologies to improve your experience, analyse traffic, and support marketing.

11.2 We use essential cookies (necessary for the website to function), analytics cookies (to understand visitor behaviour), and marketing cookies (to deliver relevant advertising).

11.3 You may control or disable cookies through your browser settings. Disabling certain cookies may affect website functionality.

11.4 We may use third-party analytics and advertising services. Data collected by those services is governed by their own privacy policies.

11.5 Our website may link to third-party websites. We are not responsible for the privacy practices of those sites and encourage you to review their privacy policies.

12. YOUR PRIVACY RIGHTS

12.1 Under the Australian Privacy Principles you have the following rights:

Access (APP 12)

You may request access to the personal information we hold about you. We will respond within 30 days. Access is generally provided free of charge; if a request requires significant resources we may charge a reasonable fee, which we will tell you about in advance. We will explain our reasons if we are permitted to refuse access.

Correction (APP 13)

If information we hold is inaccurate, out of date, incomplete, irrelevant, or misleading, you may request correction. We will correct it promptly, or explain our reasons for declining and tell you how to complain.

Anonymity and Pseudonymity (APP 2)

Where lawful and practicable you may deal with us anonymously or by pseudonym. This may limit our ability to provide certain services.

Direct Marketing Opt-Out (APP 7)

You may ask us at any time to stop sending you direct marketing, and to tell you the source of the information we used. We will action your request within 5 business days and will not charge you for doing so.

Complaints (APP 1)

You may complain if you believe we have breached the Australian Privacy Principles. See Section 13.

13. COMPLAINTS AND ENQUIRIES

13.1 If you believe we have breached the Australian Privacy Principles or this Policy, please contact our Privacy Officer in writing (see Section 14).

13.2 We will acknowledge your complaint within 5 business days and provide a substantive response within 30 days.

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

- Website: www.oaic.gov.au
- Phone: 1300 363 992
- Post: GPO Box 5218, Sydney NSW 2001

13.4 Complaints about marketing calls or electronic messages may be made to the Australian Communications and Media Authority at www.acma.gov.au or on 1300 850 115.

13.5 Complaints about our conduct as a licensed real estate agent may be made to the Office of Fair Trading Queensland on 13 QGOV (13 74 68) or at www.qld.gov.au/oft.

14. CONTACT US

For privacy enquiries, access or correction requests, marketing opt-outs, or complaints, please contact:

Company	Dominium Wealth Pty Ltd
ABN	88 677 335 143
RE Licence No.	4943806
Privacy Officer	privacy@dominiumwealth.com.au
Location	Queensland, Australia
Response Time	5 business days (acknowledgement); 30 days (substantive response)

15. ADDITIONAL PROVISIONS

15.1 Children's Privacy: Our services are not directed at individuals under 18 years of age. We do not knowingly collect personal information from persons under 18 without verifiable parental or guardian consent.

15.2 Sensitive Information: We handle sensitive information as defined in the Privacy Act 1988 (Cth) with heightened care, and collect, use, or disclose it only with your consent or as otherwise permitted by law.

15.3 De-identified Information: We may use de-identified and aggregated data that cannot reasonably identify you for research and business improvement.

15.4 Interaction with the Property Occupations Act: As the holder of a Queensland real estate agent licence, our collection and handling of personal information in the course of property agency work is also subject to the record-keeping requirements of the Property Occupations Act 2014 (Qld) and the Property Occupations Regulation 2014 (Qld).

15.5 Governing Law: This Privacy Policy is governed by the laws of Queensland, Australia.

Dominium Wealth is committed to handling your personal information with the highest standards of security, transparency, and integrity.

Dominium Wealth Pty Ltd | ABN 88 677 335 143 | Licence No. 4943806 | Queensland, Australia