

Privacy Policy

Gippsreal Limited
ACN 005 443 292

AFSL 219612

ACL 219612

Record of Document Changes

Review Date	List of Changes	Authorised Person Signature

Privacy Policy

Dated 19 March 2024

Purpose

- A. As part of the Gippsreal Limited ACN 005 443 292 (**the Fund**) process to ensure that it continues to maintain the highest levels of professional integrity and ethical conduct, the Fund has adopted this Privacy Policy (**Policy**) to manage personal information in an open and transparent manner.
- B. The provisions of this Policy will assist the Fund in complying with the requirements of the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles in protecting the personal information the Fund holds about its clients.

Operative provisions

1. Definitions

1.1 Definitions

In this document:

TERM	DEFINITION
APP entity	means an agency or organisation as defined in section 6 of the Privacy Act.
Australian law	means <ul style="list-style-type: none">(a) an Act of the Commonwealth or of a State or Territory; or(b) regulations, or any other instrument, made under such an Act; or(c) a Norfolk Island enactment; or(d) a rule of common law or equity.
the Fund	means Gippsreal Limited ACN 005 443 292 and any related bodies corporate that might exist from time to time.
Collects	Gippsreal Limited collects personal information only if Gippsreal Limited collects the personal information for inclusion in a record or generally available publication.

TERM	DEFINITION
Court/tribunal order	<p>means an order, direction or other instrument made by:</p> <ul style="list-style-type: none"> (a) a court; or (b) a tribunal; or (c) a judge (including a judge acting in a personal capacity) or a person acting as a judge; or (d) a magistrate (including a magistrate acting in a personal capacity) or a person acting as a magistrate; or (e) a member or an officer of a tribunal; <p>and includes an order, direction or other instrument that is of an interim or interlocutory nature.</p>
De-identified	<p>personal information is <i>de-identified</i> if the information is no longer about an identifiable individual or an individual who is reasonably identifiable.</p>
Eligible Data Breach	<p>An eligible data breach occurs:</p> <p>where there has been unauthorised access or unauthorised disclosure of personal information, or a loss of personal information, that Gippsreal Limited holds; and</p> <p>the unauthorised access or unauthorised disclosure is likely to result in serious harm to one or more clients; and</p> <p>Gippsreal Limited is not able to prevent the likely risk of serious harm with remedial action.</p>
Holds	<p>Gippsreal Limited holds personal information if it has possession or control of a record that contains the personal information.</p>
Identifier of an individual	<p>means a number, letter or symbol, or a combination of any or all of those things, that is used to identify the individual or to verify the identity of the individual, but does not include:</p> <ul style="list-style-type: none"> (a) the individual's name; or (b) the individual's ABN (within the meaning of the A New Tax System (Australian Business Number) Act 1999); or (c) anything else prescribed by the regulations.
Permitted general situation	<p>As defined in s16A of the Privacy Act.</p>
Permitted health situation	<p>As defined in s16B of the Privacy Act.</p>

TERM	DEFINITION
Personal information means	<p>means information or an opinion about an identified individual, or an individual who is reasonably identifiable:</p> <ul style="list-style-type: none"> (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not.
Sensitive information	<p>means</p> <ul style="list-style-type: none"> (a) information or an opinion about an individual's: <ul style="list-style-type: none"> (i) racial or ethnic origin; or (ii) political opinions; or (iii) membership of a political association; or (iv) religious beliefs or affiliations; or (v) philosophical beliefs; or (vi) membership of a professional or trade association; or (vii) membership of a trade union; or (viii) sexual orientation or practices; or (ix) criminal record; <p>that is also personal information; or</p> (b) health information about an individual; or (c) genetic information about an individual that is not otherwise health information. (d) biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or (e) biometric templates.

2. This Policy

2.1 Effective Date

This policy is effective from the review date above.

2.2 Supersedes

This document supersedes all previous documents, practices and policies relevant to Privacy.

2.3 When does this Policy Apply?

- (a) Policy applies to all Responsible Managers, directors, officers and employees of the Fund at all times, and the requirements remain in force on an ongoing basis.
- (b) This Policy represents the standards which apply throughout the Fund. Where the Fund relies on a third party for compliance with this Policy, the Fund must ensure that such reliance is permissible under and complies with the applicable law and is consistent with this Policy.

2.4 Policy Review

This Policy will be reviewed on at least an annual basis by the Responsible Manager of the Fund, having regard to the changing circumstances of the Fund. The Responsible Manager will then make any changes as necessary to ensure the ongoing compliance of this Policy is followed through adequately.

3. Privacy Statement

3.1 Responsible Manager Obligations

- (a) The Fund' Responsible Manager must ensure that at all times the provisions of this policy are implemented in the day to day running of the Fund.
- (b) The Responsible Manager must ensure that at all times this Policy:
 - (i) is current and reflects the latest applicable Australian laws;
 - (ii) contains the following information:
 - (A) the kinds of personal information that the Fund collects and holds;
 - (B) how the Fund collects and holds personal information;
 - (C) the purposes for which the Fund collects, holds, uses and discloses personal information;
 - (D) how an individual may complain about a breach of the Australian Privacy Principles, or other relevant legislation that binds the Fund, and how the Fund will deal with such a complaint;
 - (E) whether the Fund is likely to disclose personal information to overseas recipients; and
 - (F) if the Fund is likely to disclose personal information to overseas recipients, the countries in which such recipients are likely to be located if it is practicable to specify those countries in this policy.

4. Personal Information

4.1 Personal Information (other than Sensitive Information)

The Fund must not collect personal information (other than sensitive information) unless the information is reasonably necessary for one or more of the Fund's functions or activities.

4.2 Quality of personal information

The Fund will ensure that the personal information it collects and the personal information it uses or discloses is, having regard to the purpose of the use or disclosure, accurate, up to date, complete and relevant.

4.3 Security of personal information

- (a) The Fund will ensure that it protects any personal information it holds from misuse, interference, loss, unauthorised access, modification and disclosure.
- (b) The Fund will take reasonable steps to destroy or de-identify any personal information it holds where:
 - (i) the Fund no longer needs the personal information for any purpose for which the information may be used or disclosed by the Fund.
 - (ii) the information is not contained in a Commonwealth record; or
 - (iii) the Fund is not required to retain that information under an Australian law, or a Court/Tribunal order.

4.4 Storage of personal information

- (a) The Fund stores personal information in different ways, including:
 - (i) hard copy on site at the Fund's head office;
 - (ii) the Fund's computer systems; and
 - (iii) electronically secure data centres which are located in Australia and owned by external service providers.
- (b) In order to ensure the Fund protects any personal information it holds from misuse, interference, loss, unauthorised access, modification and disclosure, the Fund implements the following procedure/system:
 - (i) access to information systems is controlled through identity and access management;
 - (ii) employees are bound by internal information securities policies and are required to keep information secure;
 - (iii) all employees are required to complete training about information security;
 - (iv) the Fund regularly monitors and reviews its compliance with internal policies and industry best practice; and
 - (v) the Fund utilises firewalls, spam and anti-virus software.
- (c) The Fund's physical premises is protected from unauthorised access through:
 - (i) the use of alarms;
 - (ii) video recording;
 - (iii) fob key access; and
 - (iv) original copies of ID stored fire protected Deed room.

4.5 Exception

The Fund may use or disclose personal information (other than sensitive information) about an individual for the purposes of direct marketing if:

- (a) the Fund collected the information from the individual, and the individual would reasonably expect the Fund to use or disclose the information for that purpose; or
- (b) the Fund has collected the information from a third party; and either:
 - (i) the Fund has obtained the individual's consent to the use or disclose the information for the purpose of direct marketing; or
 - (ii) it is impracticable for the Fund to obtain the individual's consent; and
- (c) the Fund provides a simple way for the individual to opt out of receiving direct marketing communications from the Fund;
- (d) for each direct marketing communication with the individual, the Fund:
 - (i) includes a prominent statement that the individual may make such a request; or
 - (ii) directs the individual's attention to the fact that the individual may make such a request; and
 - (iii) the individual has not made a request to opt out of receiving direct marketing.

5. Sensitive information

5.1 Sensitive Information

The Fund must not collect sensitive information about an individual unless:

- (a) the individual consents to the collection of the information and the information is reasonably necessary for one or more of the Fund's functions or activities; or
- (b) the collection of the information is required or authorised by or under an Australian law or a Court/Tribunal order; or
- (c) a permitted general situation exists in relation to the collection of the information by the Fund; or
- (d) a permitted health situation exists in relation to the collection of the information by the Fund.

Exception

- (e) The Fund may use or disclose sensitive information about an individual for the purpose of direct marketing if the individual has consented to the use or disclosure of the information for that purpose.

6. Collecting data

6.1 Means of collection

- (a) The Fund must only collect personal information by lawful and fair means.
- (b) The Fund must only collect personal information about an individual from the individual (rather than someone else), unless it is unreasonable or impracticable to do so or the individual has instructed the Fund to liaise with someone else.
- (c) The Fund will collect personal information from an individual when:
 - (i) the Fund's Application for Finance Form is completed;
 - (ii) the Fund's Offer to Invest is completed;
 - (iii) a Client provides the information to the Fund's representatives over the telephone, via email, fax or in person; or
 - (iv) a Client provides the information to the Fund on the website.

6.2 Information collected by the Fund.

The information the Fund collects may include the following:

- (a) name;
- (b) date of birth;
- (c) postal or email address;
- (d) phone numbers;
- (e) gender;
- (f) marital status;
- (g) occupation;
- (h) bank account details;
- (i) tax file number;
- (j) financial information;
- (k) other information the Fund considers necessary to their functions and activities; and
- (l) if you apply for credit, we may also collect credit information such as details relating to credit history, credit capacity, and eligibility for credit.

6.3 Purpose of collection

- (a) If an individual is acquiring or has acquired a product or service from the Fund, the individual's personal information will be collected and held for the purposes of:
 - (i) checking whether an individual is eligible for the Fund's services;
 - (ii) providing the individual with the Fund's services;

- (iii) managing and administering the Fund's services;
 - (iv) protecting against fraud, crime or other activity which may cause harm in relation to the Fund's services;
 - (v) complying with legislative and regulatory requirements in any jurisdiction; or
 - (vi) to assist the Fund in the running of its Fund.
- (b) If an individual is an investor who provides personal information to the Fund, the individual's personal information will be collected and held for the purposes of:
- (i) establishing an investor's identity which may include information being checked with the document issuer or official record holder via third party systems;
 - (ii) managing the mortgage investments on an investor's behalf;
 - (iii) informing an investor about other potential mortgage investments, services and changes in the mortgage investments;
 - (iv) distributing interest, receipting or redeeming principal funds and reporting to investors; and
 - (v) complying with our legal obligations and assist government and law enforcement agencies or regulators.
- (c) The Fund may also collect personal information for the purposes of letting an individual know about products or services that might better serve their needs or other opportunities in which they may be interested.

7. Dealing with Unsolicited Personal Information

7.1 Unsolicited Personal Information

If the Fund:

- (a) receives personal information about an individual; and
- (b) the information is not solicited by the Fund.

the Fund must, within a reasonable period after receiving the information, determine whether or not it was permitted to collect the information.

7.2 Making a determination of Unsolicited Personal Information

- (a) The Fund may use or disclose the personal information for the purposes of making a determination.
- (b) If the Fund:
 - (i) determines that it could not have collected the personal information; and
 - (ii) the information is not contained in a Commonwealth record,

the Fund must as soon as practicable, destroy the information or ensure that the information is de-identified, only if it is lawful and reasonable to do so.

8. Notification of collection

8.1 Application

This section applies to:

- (a) solicited information; and
- (b) unsolicited information to which section 7 does not apply.

8.2 Notification

The Fund must notify the individual of the following matters in the Privacy Statement:

- (a) the Fund's identity and contact details;
- (b) if the Fund collects the personal information from a third party or the individual is not aware that the Fund has collected the personal information, the fact that the Fund so collects, or has collected the information and the circumstances of that collection;
- (c) if the collection of the personal information is required or authorised by or under an Australian law or a Court/Tribunal order, the fact that the collection is so required or authorised (including the details of the law or court);
- (d) the purposes for which the Fund collects the personal information;
- (e) the main consequences (if any) for the individual if the information is not collected by the Fund.
- (f) any other entities to which the Fund usually discloses personal information of the kind collected by the Fund;
- (g) that the Fund's Privacy Statement and this Privacy Policy contains information about how the individual may access the personal information about the individual that is held by the Fund and seek correction of such information;
- (h) that the Fund's Privacy Statement contains information about how the individual may complain about a breach of the Australian Privacy Principles and how the Fund will deal with such a complaint;
- (i) whether the Fund will disclose the personal information to overseas recipients; and
- (j) if the Fund discloses the personal information to overseas recipients – the countries in which such recipients will be located if it is practicable to specify those countries in the notification or to otherwise make the individual aware of them.

9. Use or disclosure of information

9.1 Permitted Use or disclosure of information

Where the Fund holds personal information about an individual that was collected for a particular purpose (**the primary purpose**), the Fund must not use or disclose the information for another purpose (**the secondary purpose**) unless:

- (a) the individual has consented to the use or disclosure of the information; or

- (b) the individual would reasonably expect the Fund to use or disclose the information for the secondary purpose and the secondary purpose is:
 - (i) directly related to the primary purpose (if the information is sensitive information);
 - (ii) related to the primary purpose (if the information is not sensitive information);
 - (iii) the use or disclosure of the information is required or authorised by or under an Australian law or a Court/Tribunal order;
 - (iv) a permitted general situation exists in relation to the use or disclosure of the information by the Fund; or
 - (v) the Fund reasonably believes that the use or disclosure of the information is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.
- (c) If the Fund collects personal information from a related body corporate, this section applies as if the Fund's primary purpose for the collection was the primary purpose for which the related body corporate collected the information.
- (d) The Fund may disclose personal information collected from clients and prospective clients to the following:
 - (i) organisations involved in providing, managing or administering the Fund's services such as third-party suppliers, e.g. printers, posting services, and our advisers;
 - (ii) organisations involved in maintaining, reviewing and developing the Fund's systems, procedures and infrastructure, including testing or upgrading the Fund's computer systems;
 - (iii) organisations involved in a corporate re-organisation;
 - (iv) organisations involved in the payments system, including financial institutions, merchants and payment organisations;
 - (v) organisations involved in product planning and development;
 - (vi) other organisations, who jointly with the Fund, provide its services;
 - (vii) authorised representatives who provide the Fund's services on its behalf;
 - (viii) the individual's representatives, including your legal advisers;
 - (ix) the Fund's financial advisers, legal advisers, accountants, credit reporting bodies or auditors;
 - (x) electronic identity verification service providers and other service providers (which may include related party service providers);
 - (xi) fraud bureaus or other organisations to identify, investigate or prevent fraud or other misconduct;
 - (xii) external dispute resolution schemes; and
 - (xiii) regulatory bodies, government agencies and law enforcement bodies in any jurisdiction.

- (e) Where the Fund uses or discloses personal information, the Fund will keep a copy of this disclosure (e.g. the email or letter used to do so).

9.2 Non-permitted Circumstances

The above does not apply to:

- (a) personal information for the purposes of direct marketing; or
- (b) government related identifiers.

9.3 Use or disclosure of information to Government Related Identifiers

Before using or disclosing a government related identifier of an individual, the Fund must ensure that such use or disclosure is:

- (a) reasonably necessary for the Fund to verify the identity of the individual for the purposes of the organisation's activities or functions;
- (b) reasonably necessary for the organisation to fulfil its obligations to an agency or a State or Territory authority;
- (c) required or authorised by or under an Australian law or a Court/Tribunal order;
- (d) within a permitted general situation (other than the situation referred to in item 4 or 5 of the table in subsection 16A(1) Privacy Act;
- (e) reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
- (f) the identifier, the Fund and the circumstances of the adoption are prescribed by regulations.

10. Direct marketing

10.1 Direct marketing

The Fund must not use or disclose the personal information it holds about an individual for the purpose of direct marketing without consent.

10.2 Requests to stop direct marketing

Where the Fund uses or discloses personal information about an individual for the purposes of direct marketing by the Fund or facilitating direct marketing by another organisation, the individual may request:

- (a) that the Fund no longer provide them with direct marketing communications;
- (b) that the Fund does not use or disclose the individual's personal information for the purpose of facilitating direct marketing by another organisation; or
- (c) that the Fund provides the source of the personal information.

Where the Fund receives the above request from an individual, the Fund will:

- (d) give effect to the individual's request within a reasonable period after the request is made free of charge; and

- (e) notify the individual of the source of the information, if the individual requests it, unless it is impracticable or unreasonable to do so.

This Section does not apply to the extent that the following laws apply:

- (f) the *Do Not Call Register Act 2006* (Cth);
- (g) the *Spam Act 2003* (Cth); or
- (h) any other Act of the Commonwealth of Australia.

11. Cross-border recipients

11.1 Disclosure to cross-border recipients

- (a) Where the Fund discloses personal information about an individual to a recipient who is not in Australia and who is not the Fund or the individual, the Fund must ensure that the overseas recipient does not breach the Australian Privacy Principles (with the exception of APP 1).
- (b) The above does not apply where the Fund reasonably believes that:
 - (i) information is subject to a law or binding scheme that has the effect of protecting the information in a way that is at least substantially similar to the way in which the Australian Privacy Principles protect the information; and
 - (ii) there are mechanisms that the individual can access to take action to enforce that protection of the law or binding scheme;
 - (iii) both of the following apply:
 - (A) the Fund has informed the individual that if they consent to the disclosure of information the Fund will not take reasonable steps to ensure the overseas recipient does not breach the Australian Privacy Principles; and
 - (B) after being so informed, the individual consents to disclosure;
 - (iv) the disclosure of the information is required or authorised by or under an Australian law or a Court/Tribunal order; or
 - (v) a permitted general situation (other than the situation referred to in item 4 or 5 of the table in subsection 16A (1) Privacy Act) exists in relation to the disclosure of the information by the Fund.

12. Adoption of Government Related Identifiers

12.1 Government Related Identifiers

The Fund must not adopt a government related identifier of an individual as its own identifier unless:

- (a) the Fund is required or authorised by or under an Australian law or a Court/Tribunal order to do so; or

- (b) the identifier, the Fund and the circumstances of the adoption are prescribed by regulations.

13. Access

13.1 Access

- (a) The Fund must give an individual access to the personal information it holds about the individual if requested by the individual, or by another person who is authorised to make a request on their behalf, for example a legal guardian or authorised agent (e.g. accountant, lawyer, financial advisor, government agencies and departments).
- (b) The Fund must respond to any request for access to personal information within a reasonable period after the request is made.
- (c) The Fund must give access to the information in the manner requested by the individual, if it is reasonable and practicable to do so and must take such steps as are reasonable in the circumstances to give access in a way that meets the needs of the Fund and the individual.
- (d) The Fund must not charge an individual for making a request and must not impose excessive charges for the individual to access their personal information.
- (e) Please refer to our contact details set out below in section 20.

13.2 Exceptions

The Fund is not required to give an individual access to their personal information if:

- (a) the Fund reasonably believes that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety;
- (b) giving access would have an unreasonable impact on the privacy of other individuals;
- (c) the request for access is frivolous or vexatious;
- (d) the information relates to existing or anticipated legal proceedings between the Fund and the individual, and would not be accessible by the process of discovery in those proceedings;
- (e) giving access would reveal intentions of the Fund in relation to negotiations with the individual in such a way as to prejudice those negotiations;
- (f) giving access would be unlawful;
- (g) denying access is required or authorised by or under an Australian law or a Court/Tribunal order;
- (h) the Fund has reason that unlawful activity, or misconduct of a serious nature, that relates to our functions or activities has been, or may be engaged in and giving access would be likely to prejudice the taking of appropriate action in relation to the matter;
- (i) giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or

- (j) giving access would reveal evaluative information generated within the Fund in connection with a commercially sensitive decision-making process.

13.3 Refusal to give access

- (a) If the Fund refuses to give access in accordance with section 13.1 and 13.2 or to give access in the manner requested by the individual, the Fund will give the individual a written notice that sets out:
 - (i) the reasons for the refusal except to the extent that, having regard to the grounds for the refusal, it would be unreasonable to do so;
 - (ii) the mechanisms available to complain about the refusal; and
 - (iii) any other matter prescribed by the regulations.
- (b) Where the Fund refuses to give access because giving access would reveal evaluative information generated within the Fund in connection with a commercially sensitive decision-making process, the Fund may include an explanation of the commercially sensitive decision in its written notice of the reasons for denial.

14. Correction of information

14.1 Correction of information

- (a) The Fund must take reasonable steps to correct all personal information, having regard to the purpose for which the information is held where:
 - (i) the Fund is satisfied the information is inaccurate, out of date, incomplete, irrelevant or misleading; or
 - (ii) the individual requests the Fund corrects the information.
- (b) Where the Fund corrects personal information about an individual that the Fund previously disclosed to another APP entity and the individual requests the Fund to notify the other APP entity of the correction, the Fund must take reasonable steps to give that notification, unless it is impracticable or unlawful to do so.

14.2 Refusal to correct information

If the Fund refuses to correct personal information as requested by the individual, the Fund will give the individual a written notice that sets out:

- (a) the reasons for the refusal except to the extent that it would be unreasonable to do so;
- (b) the mechanisms available to complain about the refusal; and
- (c) any other matter prescribed by the regulations.

14.3 Requests to Associate a Statement with their information

If:

- (a) the Fund refuses to correct personal information as requested by the individual; and

- (b) the individual requests that the Fund associate a statement noting that the information is inaccurate, out of date, incomplete, irrelevant or misleading, with the individual's information; then

the Fund must take such steps as are reasonable in the circumstances to associate the statement with the individual's personal information. The statement should be associated with the information in such a way that will make the statement apparent to users of the information.

14.4 Dealing with Requests

The Fund must:

- (a) respond to requests under this section within a reasonable period after the request is made; and
- (b) must not charge the individual for the making of the request, for correcting the personal information or for associating the statement with the personal information.

15. Cookies

The Fund does not use cookies on its website.

16. Notifiable Data Breaches Scheme

16.1 Notification to OAIC

- (a) Under the *Privacy Amendment (Notifiable Data Breaches) Act 2017* (Privacy Amendment Act) the Fund is required to notify the Office of the Australian Information Commissioner (OAIC) in relation to all eligible data breaches.
- (b) The Fund must notify the OAIC by lodging a Notifiable Data Breach Form soon as practicable. The Notifiable Data Breach Form is available on OAIC's website or at the following link: Notifiable Data Breach Form (Fund.gov.au).

16.2 Notification to Clients

Under the Privacy Amendment Act, the Fund must also promptly inform clients whose personal information has been compromised by the eligible data breach that a breach of their personal information has occurred.

16.3 Data Breach Response Plan

The Fund has also developed a Data Breach Response Plan in accordance with the OAIC's guidelines to ensure the timely notification of all clients affected by any eligible data breach.

17. Policy Breaches

17.1 Disciplinary action

Breaches of this Policy may lead to disciplinary action being taken against the relevant party, including dismissal in serious cases and may also result in prosecution under the law where that act is illegal. This may include re-assessment of bonus qualification, termination of employment and/or fines (in accordance with the Privacy Act).

17.2 Staff training and Obligations

- (a) Staff are trained internally on compliance and their regulatory obligation to the Fund. They are encouraged to respond appropriately to and report all breaches of the law and other incidents of non-compliance, including the Fund's policies, and seek guidance if they are unsure.
- (b) Staff must report breaches of this Policy directly to the Responsible Manager.

18. Retention of Forms

18.1 Document retention

The Responsible Manager will retain the completed forms for seven (7) years in accordance with the Fund's Document Retention Policy. The completed forms are retained for future reference and review.

18.2 Data record keeping

As part of their training, all staff are made aware of the need to practice thorough and up to date record keeping, not only as a way of meeting the Fund's compliance obligations, but as a way of minimising risk.

19. Complaints

19.1 How to lodge a complaint?

If you have any questions regarding this Privacy Policy or any concerns or complaints regarding our treatment of your personal information, including where you consider that we have breached the Australian Privacy Principles, we invite you to contact us. Our contact details are set out below in section 20. You can also contact the Office of the Australian Information Commissioner (**OAIC**). The OAIC's details are set out below in section 20.

19.2 How we'll handle the complaint

We will aim to answer your question, concern, request or complaint in a timely and satisfactory manner. If we cannot resolve the matter at the point of first contact, a representative will be in contact within a reasonable time to advise:

- (a) Who will be handling your enquiry; and
- (b) How our investigations are progressing.

20. Contact Details

If you have any questions or would like further information about our privacy and information handling practices, please contact us:

- (a) Privacy Officer:
 - (i) Phone: (03) 5662 2529
 - (ii) Post:
The Privacy Officer
Gippsreal Limited

41 McCartin Street
Leongatha VIC 3953

- (iii) Email: justin@gippsreal.net.au

Alternatively, you can also contact the OAIC if you have a complaint about how we handle your personal information:

- (b) OAIC:
 - (i) Phone: 1300 363 992
 - (ii) Post:
GPO Box 5218
Sydney NSW 2001
 - (iii) Website: www.oaic.gov.au