

Privacy Policy

Last updated: 3 October 2025

1. Who We Are

- **Vines RE Pty Ltd (ACN 631 691 417) and Vines PM Pty Ltd (CAN 631 706 244) trading as RWC Western Sydney** and their related entities; and
- **RWWS Projects Pty Ltd (ACN 631 706 244) trading as Ray White Projects** and its related entities,

(we, us, our), recognise the importance of protecting the privacy and rights of individuals in relation to their personal information.

This Privacy Policy explains how we collect, hold, use and disclose your personal information in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs).

2. What is Personal Information?

“Personal information” has the meaning given in the Privacy Act. In general terms, it includes information that can identify you personally (such as your name, address, date of birth, driver’s licence, or contact details) or information that can reasonably identify you when combined with other data.

It also includes information such as:

- professional or business details (occupation, role, employer, ABN/ACN),
- financial and credit information (where relevant to leasing, transactions or asset management),
- government identifiers (such as driver’s licence, passport, TFN), which we only collect and use where permitted by law (e.g. AML/KYC requirements),
- technical data (such as IP addresses or device identifiers when you use our websites).

We may also collect **sensitive information** (such as information about memberships, affiliations or health details) but only with your consent or where required or authorised by law.

3. What Personal Information We Collect

The types of information we may collect include:

- names, job titles and business contact details,
- email addresses, phone numbers and mailing/street addresses,

- identification details of directors or guarantors provided for credit or leasing purposes,
- financial details relevant to transactions, leasing, or asset management,
- information you provide to us through enquiries, application forms, agreements, feedback, surveys or complaints,
- information obtained from searches of public registers such as ASIC or Land Registry Services,
- information about properties you own, lease, occupy or have an interest in, including title details, ownership records, lease information and related dealings,
- information obtained through credit reporting agencies (including CreditorWatch),
- information collected via our websites (cookies, analytics, IP addresses).

4. How We Collect Personal Information

We collect information in several ways, including:

- directly from you (in person, by phone, by email, through our websites, or via forms/contracts),
- through your dealings with our representatives, employees, or contractors,
- from publicly available sources such as websites, media, directories and public registers (e.g. ASIC company searches, Land Title searches),
- from third parties such as your professional advisers (lawyers, accountants),
- from credit reporting bodies and commercial data providers such as CreditorWatch,
- from our service providers (IT, marketing, cloud hosting, analytics).

5. Why We Collect and Use Personal Information

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

- provide our commercial real estate, asset management, project marketing and related services,
- manage information about properties owned, leased or controlled by you,
- perform due diligence, leasing and asset management functions (including AML/CTF compliance and credit checks),
- respond to enquiries and provide information or advice,
- manage our client and supplier relationships,
- assess and process transactions, applications and guarantor arrangements,
- conduct business operations, including billing, accounts and administration,
- carry out marketing, research and service development,
- comply with our legal obligations (e.g. AML/CTF, property and corporate law),
- manage and resolve complaints.

6. Credit Reporting and CreditorWatch

We may disclose your personal information (including information about directors or guarantors) to **CreditorWatch Pty Ltd (ABN 95 144 644 244)**, a credit reporting body, for the purposes of obtaining credit reports and managing credit risk in our Asset Management division.

CreditorWatch may include this information in reports provided to other organisations. We may also disclose defaults or payment issues to CreditorWatch.

Your rights in relation to credit reporting include the right to:

- request access to the information CreditorWatch holds about you,
- request correction of inaccurate information,
- request that CreditorWatch does not use your information for direct marketing pre-screening,
- request that CreditorWatch does not disclose your information if you are a victim of fraud.

For more information, please see CreditorWatch's Privacy Policy at <https://creditorwatch.com.au/privacy-policy>.

7. Disclosure of Personal Information

We may disclose personal information to:

- our employees, related entities, contractors and service providers,
- franchisees and their employees/agents where relevant to the provision of services,
- third-party suppliers such as IT providers, cloud hosting services, payment processors, marketing platforms, and analytics providers,
- credit reporting agencies such as CreditorWatch,
- property data service providers (such as CoreLogic, RP Data or similar platforms) and professional valuers engaged in connection with the sale, leasing or assessment of property,
- government regulators and law enforcement agencies where required,
- professional advisers (accountants, auditors, solicitors, consultants).

Franchisor

As part of the Ray White network, we may provide your personal information to the franchisor, Ray White (Real Estate) Partnership and its related entities, for reporting, compliance, business support and network management purposes. The franchisor will collect, hold, use and disclose that information in accordance with its own Privacy Policy, which is available at <https://www.raywhite.com/contact/privacy-policy>.

We may also disclose your personal information to other organisations with your express consent.

Some of our service providers are located overseas. Where your personal information is disclosed overseas (including cloud or server storage), we take reasonable steps to ensure the recipient complies with the APPs or is subject to equivalent protections.

8. Direct Marketing

We may use your personal information to send you marketing communications about our services, opportunities and events. These may be sent by email, SMS, post or other means, in accordance with marketing laws such as the Spam Act 2003 (Cth).

You may opt out at any time and at no cost by:

- using the unsubscribe facility in the communication, or
- contacting us directly (see section 12).

We do not sell your personal information to third parties for marketing.

9. Security of Your Personal Information

We take reasonable steps to protect the personal information we hold from misuse, interference, loss, and from unauthorised access, modification or disclosure. These measures include:

- secure storage systems, restricted access, password protections,
- physical security such as locked offices and filing cabinets,
- staff training and confidentiality agreements,
- secure destruction or de-identification of information when no longer required.

However, as the internet is inherently insecure, we cannot guarantee the security of information transmitted online.

10. Access and Correction

You may request access to personal information we hold about you, or request corrections if you believe it is inaccurate, out-of-date, incomplete, or misleading.

- We will not charge you for making a request or for correcting your information.
- We may charge a reasonable fee to cover the cost of providing access to large volumes of information.
- In some cases, access may be refused (e.g. where it would unreasonably impact the privacy of others or breach confidentiality). If so, we will provide written reasons.

11. Complaints

If you believe your privacy has been breached, please contact our Privacy Officer (details below) and provide details of the incident so we can investigate.

- Att: **RWCWS Group Privacy Officer**
- E-mail: rwcs.nsw@raywhite.com
- Post: Level 1, 15-17 Argyle Street Parramatta NSW 2150

If you are not satisfied with our response, you may refer your complaint to the **Office of the Australian Information Commissioner (OAIC)**:

- Website: www.oaic.gov.au

- Phone: 1300 363 992
- Post: GPO Box 5218, Sydney NSW 2001

12. Contact Us

- Att: **RWCWS Group Privacy Officer**
- E-mail: rwcs.ws.nsw@raywhite.com
- Post: Level 1, 15-17 Argyle Street Parramatta NSW 2150

13. Changes to This Policy

We may update this Privacy Policy from time to time. The latest version will always be published on our main website at www.rwcws.com. For significant changes, we may also notify you directly (for example, by email or a website notice).