

# Data Processing Policy

## 1. Introduction

OurProperty.com.au is a leading provider of software solutions in the property management sector. As part of our commitment to delivering exceptional service and maintaining the trust of our customers and their users, we recognise the importance of safeguarding personal data. This Data Processing Policy outlines our approach to data processing and our adherence to data protection laws, including the General Data Protection Regulation (GDPR) and other applicable regulations.

OurProperty.com.au is dedicated to ensuring that personal data is processed in a secure and transparent manner. This policy details our responsibilities as a data processor and the measures we have implemented to protect personal data throughout its lifecycle. It also highlights our commitment to facilitating compliance for our customers who act as data controllers.

## 2. Scope

This policy applies to all personal data processed by OurProperty.com.au in the context of providing services to our customers where we are the data controller. It covers the collection, processing, storage, and handling of personal data as part of our operations.

## 3. Definitions

- **Personal Data:** Any information relating to an identified or identifiable individual.
- **Processing:** Any operation or set of operations performed on personal data, including collection, recording, organisation, structuring, storage, alteration, retrieval, consultation, use, disclosure, dissemination, restriction, erasure, or destruction.
- **Controller:** The entity that determines the purposes and means of processing personal data.
- **Processor:** The entity that processes personal data on behalf of the controller.

## 4. Data Processing Principles

OurProperty.com.au adheres to the following principles when processing personal data:

- **Lawfulness, Fairness, and Transparency:** We process personal data lawfully, fairly, and transparently.
- **Purpose Limitation:** Personal data is collected for specified, legitimate purposes and not further processed in a manner incompatible with those purposes.
- **Data Minimisation:** We ensure that personal data is adequate, relevant, and limited to what is necessary for the purposes for which it is processed.

- **Accuracy:** We take reasonable steps to ensure that personal data is accurate and kept up to date.
- **Storage Limitation:** Personal data is kept in a form which permits identification of data subjects for no longer than necessary.
- **Integrity and Confidentiality:** Personal data is processed securely to protect against unauthorised or unlawful processing, accidental loss, destruction, or damage.

## 5. Data Processing Activities

In the course of providing our services, OurProperty.com.au processes personal data on behalf of our customers. The processing activities include, but are not limited to:

- Data collection and entry
- Data storage and management
- Data analysis and reporting
- Data sharing with authorised parties as per customer instructions

## 6. Data Protection Measures

OurProperty.com.au is committed to ensuring the highest standards of data protection. We have implemented a comprehensive set of technical and organisational measures to safeguard personal data against unauthorised access, accidental loss, destruction, or damage. These measures are designed to maintain the confidentiality, integrity, and availability of personal data. Key elements of our data protection measures include:

- **Access Controls and Authentication:** We employ robust access control mechanisms to ensure that only authorised personnel have access to personal data. This includes role-based access controls, multi-factor authentication, and strict user authentication protocols to prevent unauthorised access.
- **Data Encryption:** To protect personal data during transmission and storage, we use advanced encryption techniques. Data in transit is encrypted using industry-standard protocols, and data at rest is encrypted using strong encryption algorithms to ensure its confidentiality.
- **Regular Security Audits:** Our security measures are subject to regular audits and assessments to identify potential vulnerabilities and ensure compliance with our data protection policies. These audits help us stay proactive in addressing any security issues and improving our data protection practices.
- **Incident Response Plan:** We have established a detailed incident response plan to quickly and effectively address any data breaches or security incidents. This plan includes procedures for identifying, containing, and mitigating the impact of a breach, as well as notifying affected parties and regulatory authorities as required by law.
- **Data Minimisation and Retention:** We adhere to the principle of data minimisation, ensuring that only the personal data necessary for our services is collected and processed. Additionally, we have implemented a data retention policy to ensure that

personal data is retained only for as long as necessary to fulfil the purposes for which it was collected. Data is securely deleted or anonymised once it is no longer needed.

- **Employee Training:** Our employees undergo regular training on data protection and security best practices. This training covers topics such as recognising phishing attempts, handling personal data securely, and understanding their responsibilities under our data protection policies.
- **Vendor Management:** We carefully select and manage third-party vendors who may have access to personal data. Our Vendor agreements include stringent data protection clauses to ensure that our vendors adhere to similar data protection standards.
- **Data Protection Officer (DPO):** Our Property Management has appointed a Data Protection Officer (DPO) responsible for overseeing our data protection activities, ensuring compliance with applicable laws, and serving as a point of contact for data protection matters.

These measures are continually reviewed and updated to adapt to new risks and changes in data protection laws. OurProperty.com.au Pty Ltd is committed to maintaining the highest standards of data protection and ensuring that personal data is handled with the utmost care and respect.

## 7. Data Subject Rights

Customers and their users have rights regarding their personal data, including:

- The right to access their personal data
- The right to rectification or correction of inaccurate data
- The right to erasure or deletion of personal data
- The right to restrict or object to processing
- The right to data portability

Requests to exercise these rights should be directed to the relevant data controller, which is typically our customer.

## 8. Data Transfers

Personal data may be transferred to countries outside of the customer's jurisdiction. OurProperty.com.au ensures that such transfers comply with applicable data protection laws, including the implementation of appropriate safeguards such as standard contractual clauses.

## 9. Data Retention

Personal data is retained only for as long as necessary to fulfill the purposes for which it was collected. Upon the termination of our services or as otherwise directed by our customers, personal data will be securely deleted or returned, as applicable.

## 10. Data Breaches

In the event of a data breach, OurProperty.com.au will notify the affected parties in accordance with applicable data protection laws and take appropriate measures to mitigate the impact of the breach.

## **11. Contact Us**

For any questions or concerns regarding this Data Processing Policy or our data processing practices, please contact us at:

Email: [support@ourproperty.com.au](mailto:support@ourproperty.com.au)

Post: Data Protection Officer

OurProperty.com.au Pty Ltd

30/50 Sanders St

Upper Mount Gravatt QLD 4122

Australia

## **12. Policy Updates**

This policy may be updated periodically to reflect changes in applicable laws or our data processing practices. The latest version will be available on the OurProperty.com.au website.