Urbane Homes Privacy Policy

Overview

Urbane Homes Pty Ltd is a Queensland-based provider of quality integrated house and land solutions. This Privacy Policy explains how Urbane Homes collects, uses, discloses, stores and otherwise handles personal information, and how individuals can access and correct that information or make a complaint about how it has been handled.

This Policy is issued for the purposes of, and should be read consistently with, Australian Privacy Principle (APP) 1 in Schedule 1 to the Privacy Act 1988 (Cth) (Privacy Act). Urbane Homes is also subject to other Commonwealth and Queensland laws that govern how personal information must be handled, including the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) (AML/CTF Act), the Spam Act 2003 (Cth), and the Do Not Call Register Act 2006 (Cth).

In this Policy, "Urbane Homes", "we", "us" and "our" refer to the Urbane Homes group of companies including:

- Urbane Homes Pty Ltd
- Waypoint Property Group Pty Ltd
- Any related body corporate, joint venture, subsidiary or special purpose vehicle through which Urbane Homes carries on business from time to time.

Each entity within the Urbane group is bound by this Policy. Where a particular entity within the group is responsible APP entity for a specific activity (for example, the named in a contract of sale), that entity is the primary controller of the personal information collected for that activity.

Personal information we handle

Personal information has the meaning given to it in section 6(1) of the Privacy Act, and broadly means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information is true or not and whether it is recorded in a material form or not.

The kinds of personal information we collect and hold vary by relationship. The principal categories of individuals about whom we hold information, and the typical information collected, are:

- Prospective and actual purchasers (residential and commercial) – name, date of birth, residential address, contact details, occupation, marital status, photo identification (e.g. driver licence, passport), source-of-funds information, conveyancing solicitor details, financier and broker details, signature, and transaction information.

- Tenants and prospective tenants (where Urbane Homes or a related entity is lessor) – name, contact details, identification documents, rental history, employment and income information, referee details, emergency contact details, and bond payment details.

- Vendors and landholders – name, contact details, identification documents, title and property information, banking details for settlement, and beneficial ownership information where the vendor is a non-individual.

- Investors, financiers and capital partners – name, contact details, residential and tax residency information, tax file number (where voluntarily provided), beneficial ownership and control information, source-of-funds and source-of-wealth information, investment preferences, and bank account details.

- Real-estate broker counterparties and referral partners – name, contact details, licence number, beneficial ownership of the broking entity, and information collected to satisfy customer due diligence on the broker (where applicable under the AML/CTF Act).

- Suppliers, subcontractors and trade partners – name, business contact details, ABN, GST registration status, licence details (including QBCC licence where applicable), insurance details, bank account details, and signatory information.

- Job applicants, prospective contractors and consultants – name, contact details, work history, qualifications, references, right-to-work documentation and information provided in a résumé or interview.

- Visitors to display suites, project sites and offices – name, contact details, CCTV footage, sign-in records, and (on construction sites) site induction information including white-card details.

- Website users and recipients of marketing communications – name, contact details, project and lifestyle preferences, IP address, browser type, pages viewed, and online behaviour collected through cookies and analytics.

Some of the information we collect is 'sensitive information' within the meaning of the Privacy Act (for example, biometric information used for identity verification). Where we collect sensitive information, we do so only with consent or where otherwise permitted by law, and we apply enhanced security measures.

Employee records of current and former employees of Urbane Homes are generally exempt from the Privacy Act under section 7B(3) where the record is directly related to the employment relationship. This Policy nonetheless reflects our practice of applying the substance of the APPs to employee records as a matter of good governance.

How we collect personal information

We collect personal information directly from individuals wherever it is reasonable and practicable to do so. Common collection points include:

- Expression-of-interest forms, contracts of sale and ancillary transaction documents;

- Customer due diligence (CDD) onboarding processes conducted by us or by a third-party identity verification provider engaged by us;

- Tenancy application forms and tenancy management platforms;

- communications with our staff (including by email, telephone, video conference, SMS and instant messaging);

- Visitor sign-in registers, site induction systems and CCTV at our sites and premises;

- Our website and social-media channels, including through cookies, analytics and embedded forms;

- Marketing and sales events, display suites and project launches;

- Recruitment processes, including through recruitment agencies and online job platforms.

Where it is not reasonable or practicable to collect personal information directly from the individual, we may collect it from a third party (for example, a buyer's solicitor, mortgage broker, real-estate agent, referee, recruiter, accountant, financier, credit reporting body, government agency or publicly available source). In those circumstances, we take such steps (if any) as are reasonable to ensure the individual is made aware of the matters listed in APP 5.

Why we collect personal information

We collect, hold, use and disclose personal information for purposes connected with our residential property development, sales and related activities. The principal purposes are:

- Sales, marketing and customer relationship management – to respond to enquiries, register expressions of interest, manage and prioritise our sales pipeline, send project information and updates, run launches and events, and conduct market research.
- Transaction execution – to negotiate, document and settle sales, lease and joint-venture transactions; to perform our obligations under contracts; to process payments and refunds; and to administer post-settlement matters (including warranty and defect rectification).
- AML/CTF compliance – to perform initial and ongoing customer due diligence (including identity verification, beneficial ownership identification, politically exposed person screening and sanctions screening), to monitor and report suspicious matters, to maintain transaction records, and to otherwise discharge our obligations as a reporting entity under the AML/CTF Act.
- Tenancy management – to assess tenancy applications, manage leases, collect rent, handle maintenance, and exercise rights and remedies under residential and commercial tenancy laws.
- Investor and capital-partner administration – to assess wholesale or sophisticated investor status, to issue interests in investment vehicles, to make distributions, to provide reporting, and to comply with our obligations under the Corporations Act 2001 (Cth) and other applicable laws.
- Supply chain and project delivery – to engage and manage subcontractors, suppliers, consultants and other counterparties, including procurement, contract administration and payment.
- Recruitment and human resources – to assess applications, conduct reference, qualification and background checks, manage onboarding, and (where applicable) administer the employment relationship.
- Site safety and security – to manage access to our sites and premises, conduct site inductions, monitor safety, investigate incidents, and protect persons and property (including through CCTV).
- Corporate governance, risk and compliance – to manage our legal, regulatory, taxation, financial reporting, audit, insurance and risk-management obligations.
- Operating our website – to provide functionality, analyse usage, improve user experience, and present relevant content.

We may also use or disclose personal information for related secondary purposes where it would be within an individual's reasonable expectations, or where we are otherwise authorised or required by law to do so.

Direct marketing

We may use your personal information to send you marketing communications about our current and future projects and related products and services. This may occur by email, SMS, mail, telephone or through targeted digital advertising. We will only send commercial electronic messages where we have your consent (express or inferred) and in compliance with the Spam Act 2003 (Cth), and we will not make marketing telephone calls to numbers listed on the Do Not Call Register except where permitted.

You can opt out of receiving direct marketing communications from us at any time by following the unsubscribe instructions in the relevant message, or by contacting our Privacy Officer using the details below. We will action your request within a reasonable period.

How we share personal information

We may disclose personal information to third parties where it is reasonably necessary for the purposes set out in this Policy, where you have consented, or where we are required or authorised by law. The principal categories of recipients are:

- Other members of the Urbane group and personnel of those entities;
- Professional advisers, including lawyers, accountants, tax agents and auditors;
- Real-estate agents, brokers and selling agents engaged in connection with a project;
- Financiers and mortgage brokers (where relevant to a transaction);
- Identity verification providers, credit reporting bodies and sanctions and PEP screening providers;
- Suppliers, contractors, consultants and other counterparties engaged in connection with a project;
- Cloud service providers, IT service providers, CRM, accounting, payroll and document management providers;
- Regulators and government agencies, including AUSTRAC, the Australian Taxation Office, the Queensland Building and Construction Commission, the Office of State Revenue, the Queensland Land Registry, local councils and the OAIC;
- Law enforcement agencies and courts and tribunals, where required;
- Co-investors, joint venturers, syndicate members and their respective advisers;
- Any party in connection with a proposed or actual sale, restructure or merger of our business or assets, subject to appropriate confidentiality undertakings.

Where Urbane Homes is a reporting entity under the AML/CTF Act, certain disclosures (including suspicious matter reports, threshold transaction reports and international funds transfer instruction reports) must be made to AUSTRAC. The AML/CTF Act prohibits Urbane Homes from disclosing the existence or contents of a suspicious matter report to the affected individual (the 'tipping off' prohibition in section 123).

Overseas disclosure

Some of the third parties to whom we disclose personal information are located outside Australia, or store information on servers located outside Australia. The principal jurisdictions in which our service providers operate are potentially the United States, the European Union, Singapore and New Zealand, although this list may change from time to time.

Before disclosing personal information to an overseas recipient, we take such steps as are reasonable in the circumstances to ensure the recipient does not breach the APPs in relation to that information, in accordance with APP 8.1. Where required, we obtain your consent to the overseas disclosure on the basis described in APP 8.2(b).

How we hold and protect personal information

We take reasonable steps to protect personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure. These steps include both technical and organisational measures, such as access controls, encryption in transit and at rest, multi-factor authentication, network and endpoint security, supplier due diligence, vendor risk management, staff training, confidentiality obligations, and an information security incident response plan.

We retain personal information for as long as it is reasonably required for the purposes for which it was collected, or for as long as we are required to retain it by law. Records subject to the AML/CTF Act are retained for at least seven years from the relevant date prescribed by that Act. Tax records are retained for at least five years in accordance with the Taxation Administration Act 1953 (Cth). When personal information is no longer required and we are not required by law to retain it, we will take reasonable steps to destroy or de-identify it.

Data breach response

We maintain a data breach response plan in accordance with the Notifiable Data Breaches scheme in Part IIIC of the Privacy Act. If we suffer an eligible data breach, we will, as soon as practicable, notify the OAIC and any individuals whose personal information is involved (or, where direct notification is not practicable, publish a notification on our website), in accordance with the requirements of that scheme.

Our website, cookies and analytics

When you visit our website, we (and our service providers) may collect information through cookies, web beacons, server logs and analytics tools (including Google Analytics or a similar product). This information may include your IP address, device type, browser, referring page, pages viewed, time on site and similar usage information.

We use this information to operate, secure and improve our website, to understand how users engage with our projects, and to deliver and measure marketing. You can configure your browser to refuse cookies, but some parts of our website may not function correctly as a result.

Automated decisions

As at the date of this Policy, Urbane Homes does not make decisions that significantly affect individuals on a substantially automated basis without human involvement. If this changes, this Policy will be updated in advance of the commencement of the relevant amendments to the Privacy Act dealing with automated decision-making transparency.

Access to and correction of personal information

You may request access to the personal information we hold about you and ask us to correct it where you believe it is inaccurate, out of date, incomplete, irrelevant or misleading. We will respond to your request within a reasonable period, ordinarily within 30 days.

We do not charge a fee for making a request, although we may charge a reasonable fee for the cost of giving access (for example, the cost of producing copies of documents). We may decline a request in the limited circumstances set out in APP 12 or APP 13 (for example, where giving access would be unlawful, or where correction would prejudice an investigation of unlawful activity). If we decline a request, we will give you written reasons and information about how to complain.

Complaints

If you believe Urbane Homes has interfered with your privacy or breached the APPs, please contact our Privacy Officer using the details below. We will acknowledge your complaint promptly and aim to provide a substantive response within 30 days.

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
- Telephone: 1300 363 992
- Post: GPO Box 5288, Sydney NSW 2001

Anonymity and pseudonymity

Wherever it is lawful and practicable, you may interact with us anonymously or using a pseudonym. It will not be practicable in many of our dealings (for example, in connection with a transaction or CDD process) because we are required by law to collect identifying information.

Changes to this Policy

We may amend this Policy from time to time. The current version will be available on our website. Material changes will be communicated by appropriate means before the changes take effect.

Contact us

Questions, requests for access or correction, and complaints under this Policy should be directed to our Privacy Officer:

- Privacy Officer: Michelle Morrison, Urbane Homes Pty Ltd
- Postal address: Level 3, 127 Creek Street, Brisbane QLD 4000
- Email: privacy@urbanehomes.com.au
- Telephone: 1300 199 077

This Privacy Policy was last updated on 17 June 2026.