

## MULTI DYNAMIC PTY LTD – PRIVACY POLICY

Multi Dynamic Pty Ltd (ABN 90 165 249 954) (**we, us** or **our**), as a franchisor of the Multi Dynamic franchise network, understands that protecting your personal information is important.

This Privacy Policy applies to Multi Dynamic Pty Ltd and its affiliated entities. Members of the Multi Dynamic franchise network (as set out at <https://multidynamic.com.au/franchise>) are independent business owners working under a common brand. Each franchisee is responsible for any personal information that you provide to them, and Multi Dynamic Pty Ltd is not responsible for how those franchisees manage your information. If the privacy policy of a Multi Dynamic franchisee refers to this Privacy Policy, you should assume that they intend to manage your information in the same way that we would.

This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or otherwise collected by us when providing our website or real estate services to you (Services) or when otherwise interacting with you.

### The information we collect

**Personal information:** is information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable.

The types of personal information we may collect about you include:

- **Identity Data** including first name, middle name, last name, maiden name, title, date of birth, gender, job title, photographic identification, pronouns and images of you.
- **Contact Data** including billing address, delivery address, email address and telephone numbers.
- **Financial Data** including bank account and payment card details (through our third party payment processor).
- **Background Verification Data** including your passport number, driver licence number, Medicare number, photographic identification or other details requested as part of our verification process to comply with our due diligence obligations, anti-money laundering laws and related ongoing monitoring commitments.
- **Transaction Data** including details about payments to you from us and from you to us and other details of products and services you have purchased from us or we have purchased from you.
- **Technical and Usage Data** including internet protocol (IP) address, your login data, your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour, information about your access and use of our website,

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including through the use of Internet cookies, your communications with our website, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider.

- **Profile Data** including profile picture, purchases or orders you have made with us, support requests you have made, content you post, send, receive and share through our platform, information you have shared with our social media platforms, your interests, preferences, feedback and survey responses.
- **Interaction Data** including information you provide to us when you participate in any interactive features of our Services, including surveys, contests, promotions, activities or events, and call recordings.
- **Marketing and Communications Data** including your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Franchise-specific Data** including credit history and credit checks for franchisee applicants, financial capacity and business experience information, franchise application and assessment data, guarantor information, business references and background checks, franchisee performance and compliance data, customer information collected through franchise locations, and employee information from franchise operations.
- **Sensitive information** is a sub-set of personal information that is given a higher level of protection. Sensitive information means information relating to your racial or ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation or practices, criminal records, health information or biometric information. We handle sensitive information with extra care and protection, and we only collect this information with your consent or when legally permitted. This includes:
  - **Identity Data:** biometric information in order to verify your identity (if we need to verify your identity before hiring you, to process and assess your property application in relation to a tenancy or property sale, or if you are a landlord and we need to verify your identity in order to manage your property); and
  - **Cultural and Background Data:** criminal record checks (if we need to verify your background before hiring you, to process and assess your property application in relation to a tenancy or property sale, or if you are a landlord we need to verify your background in order to manage your property) and professional memberships (to assess the suitability for employment).

## How we collect personal information

We collect personal information in a variety of ways, including:

- **Directly:** We collect personal information which you directly provide to us, including through the 'contact us' form on our website or when you request our assistance via email, or over the telephone.
- **Indirectly:** We may collect personal information which you indirectly provide to us while interacting with us, such as when you use our website, in emails, over the telephone and in your online enquiries.
- **From third parties:** We collect personal information from third parties, such as details of your use of our website from our analytics and cookie providers and marketing providers. See the "Cookies" section below for more detail on the use of cookies.
- **From publicly available sources:** We collect personal data from publicly available resources such as the Australian Securities and Investment Commission (ASIC) and professional networking sites such as LinkedIn.

## Why we collect, hold, use and disclose personal information

We have set out below, in a table format, a description of the purposes for which we plan to collect, hold, use and disclose your personal information.

Purpose of use / disclosure	Type of Personal Information
To assess whether to take you on as a new client or worker, including to perform anti-money laundering, anti-terrorism, sanction screening, fraud and other background checks on you.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Background Verification Data</li> </ul>
To provide our Services to you, including to assess your application and manage your appointments.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> </ul>
To contact and communicate with you about our Services including in response to any support requests you lodge with us or other enquiries you make with us.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Profile Data</li> </ul>
To contact and communicate with you about any enquiries you make with us via our website.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> </ul>
For internal record keeping, administrative, invoicing and billing purposes.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Financial Data</li> <li>• Transaction Data</li> </ul>

For analytics including profiling on our website, market research and business development, including to operate and improve our Services, associated applications and associated social media platforms.	<ul style="list-style-type: none"> <li>• Profile Data</li> <li>• Technical and Usage Data</li> </ul>
For advertising and marketing, including to send you promotional information about our events and experiences and information that we consider may be of interest to you.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Technical and Usage Data</li> <li>• Profile Data</li> <li>• Marketing and Communications Data</li> </ul>
To run promotions, competitions and/or offer additional benefits to you.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Profile Data</li> <li>• Interaction Data</li> <li>• Marketing and Communications Data</li> </ul>
To comply with our legal obligations or if otherwise required or authorised by law.	<ul style="list-style-type: none"> <li>• Any relevant Personal Information</li> </ul>
Franchise management and operation, including to assess and process franchise applications, conduct credit checks and background verification, monitor franchise network performance and compliance, manage customer data collected through franchise location, and oversee employment practices across franchise operations	<ul style="list-style-type: none"> <li>• Contact Data</li> <li>• Profile Data</li> <li>• Interaction Data</li> <li>• Marketing and Communications Data</li> <li>• Franchise-specific Data</li> </ul>
<p><b>Sensitive information:</b> We only collect, hold, use and disclose sensitive information for the following purposes:</p> <ul style="list-style-type: none"> <li>• any purposes you consent to;</li> <li>• the primary purpose for which it is collected, to verify your identity and assess your application for our Services;</li> <li>• secondary purposes that are directly related to the primary purpose for which it was collected, including disclosure to the below listed third parties as reasonably necessary to provide our Services to you;</li> <li>• to contact emergency services, or to speak with your family, partner or support person where we reasonably believe there is a serious risk to the life, health or safety of you or another person and</li> </ul>	<ul style="list-style-type: none"> <li>• Sensitive Information</li> </ul>

<p>it is impracticable for us to obtain your consent; and</p> <ul style="list-style-type: none"> <li>• if otherwise required or authorised by law.</li> </ul>	
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## Our disclosures of personal information to third parties

We may disclose personal information to:

- our employees, contractors and/or related entities;
- our franchisees within our network, franchise advisory councils or committees, and/or credit reporting bodies for franchisee assessment;
- identity verification providers (such as ScanTek or InfoTrack);
- tenancy database providers (such as TICA);
- real estate portals (such as REA and Domain);
- property report and document management providers (such as VaultRE, Inspection Manager, Realtair and Before You Buy);
- IT service providers, data storage, data analysis, web hosting and server providers (such as VaultRE and CoreLogic);
- communications providers (such as NexGen);
- marketing or advertising providers (such as Inspra AI);
- professional advisors, bankers, auditors, our insurers and insurance brokers;
- payment systems operators and accounting software providers (such as Property Tree);
- our existing or potential agents or business partners;
- sponsors or promoters of any promotions or competition we run;
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;
- the Real Estate Institute of New South Wales and other real estate associations in the states and territories we operate in;
- courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;
- third parties to collect and process data, such as Google Analytics (To find out how Google uses data when you use third party websites or applications, please see [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/) or any other URL Google may use from time to time), Meta Pixel or other relevant analytics businesses; and
- any other third parties as required or permitted by law, such as where we receive a subpoena.

### **Sharing within the franchise network**

As part of our franchise operations, our franchisees and head office may share personal information, including:

- customer information to deliver services
- employee information where staff work across multiple franchise locations
- operational data to maintain consistent service standards
- performance and compliance information

Our head office requires all franchisees to handle personal information in accordance with privacy laws and our privacy standards as set out in our franchise agreements and operations manuals. Any privacy policy by a franchisee may be similar or different to our Privacy Policy.

### **Overseas disclosure**

We may store personal information in Australia, the United States, or Singapore. Where we disclose your personal information to the third parties listed above (such as business partners or service providers, including those who provide cloud-based services or data storage solutions), these third parties may also store, transfer or access personal information outside of Australia.

Before disclosing your personal information overseas, we take reasonable steps to ensure that the recipient treats your information in accordance with applicable law by only sending what is necessary, requiring recipients to protect your information through contractual agreements which require the recipient to comply with the privacy standards in applicable law or through other mechanisms that provide comparable safeguards and by monitoring how recipients handle your information.

### **Your rights and controlling your personal information**

**Your choice:** Please read this Privacy Policy carefully. If you provide personal information to us, you understand we will collect, hold, use and disclose your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us, however, if you do not it may affect our ability to provide our Services to you and your use of our Services.

**Information from third parties:** If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

**Anonymity:** Where practicable we will give you the option of not identifying yourself or using a pseudonym in your dealings with us.

**Restrict and unsubscribe:** To object to processing for direct marketing/unsubscribe from our email database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

**Access:** You may request access to the personal information that we hold about you. An administrative fee may be payable for the provision of such information. Please note, in some situations, we may be legally permitted to withhold access to your personal information. If we cannot provide access to your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal. If we can provide access to your information in another form that still meets your needs, then we will take reasonable steps to give you such access.

**Correction:** If you believe that any information, we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to promptly correct any information found to be inaccurate, out of date, incomplete, irrelevant or misleading. Please note, in some situations, we may be legally permitted to not correct your personal information. If we cannot correct your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal.

**Complaints:** If you wish to make a complaint, please contact us using the details below and provide us with full details of the complaint. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take in response to your complaint. If you are not satisfied with our response, you also have the right to contact the Office of the Australian Information Commissioner.

## How to contact us about your rights or to make a complaint and what happens next

**Step 1:** Contact our privacy officer

- Email: [compliance@multidynamic.com.au](mailto:compliance@multidynamic.com.au)
- Phone: [0401 994 932](tel:0401994932)
- Post: [Suite 118, Level 49, 8 Parramatta Square 10 Darcy Street, Parramatta NSW 2150, Australia](#)

Your full name, contact details, clear details about your request or complaint, and any relevant dates or reference numbers.

**Step 2:** Our response

We will:

- Verify your identity before processing your request
- Investigate thoroughly (for complaints) or process your request (for rights)
- Respond to you in writing within reasonable timeframes and as required by law
- Explain what actions we will take and keep you updated on progress
- Not charge you for making a request (except for reasonable access fees if applicable)
- Help you understand and exercise your rights

### Step 3: If you're not satisfied (complaints only)

If you're not satisfied with our response to your complaint, you can:

- Ask for a review by our senior management, or
- Contact external bodies:
- Australian residents: Office of the Australian Information Commissioner (Phone: 1300 363 992, Website: [www.oaic.gov.au](http://www.oaic.gov.au))

## Storage and security

We are committed to ensuring that the personal information we collect is secure. To prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures, to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

While we are committed to security, we cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk.

## User-Generated Content

We may enable you to post reviews, comments, photos and other user-generated content. Any content you choose to submit will be accessible by anyone, including third parties not associated with us. We have no control over how others may use or misuse information you make publicly available. We are not responsible for the privacy, security or accuracy of any user-generated content you choose to post or for the use or misuse of that information by any third parties.

## Cookies

We may use cookies, tracking pixels and similar technologies on our website and in our emails from time to time. Cookies are text files placed in your computer's browser to store your preferences. Tracking pixels are tiny, invisible images (typically the size of one pixel) embedded in web pages or emails. Cookies and tracking pixels, by themselves, do not tell us your email address or other personally identifiable information. However, they do recognise you when you return to our online website and allow third parties to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. When you choose to provide our online website with personal information, this information may be linked to the data stored in the cookie or collected by tracking pixels. Unlike cookies, tracking pixels do not store any information on your device, but instead send information to our servers when the pixel is loaded.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies.

You can block tracking pixels by using ad-blocking or privacy-focused browser extensions. Some email providers allow you to block images by default, which can prevent tracking pixels in emails from loading.

However, if you use your browser settings to block all cookies (including essential cookies) and tracking pixels you may not be able to access all or parts of our website and you may not receive personalised content.

**Google Analytics:** We may have enabled Google Analytics Advertising Features including Remarketing Features, Advertising Reporting Features, Demographics and Interest Reports, Store Visits, and Google Display Network Impression reporting. We and third-party vendors may use first-party cookies (such as the Google Analytics cookie) or other first-party identifiers, and third-party cookies (such as Google advertising cookies) or other third-party identifiers together.

You can opt-out of Google Analytics Advertising Features including using a Google Analytics Opt-out Browser add-on found [here](#). To opt-out of personalised ad delivery on the Google content network, please visit Google's Ads Preferences Manager [here](#) or if you wish to opt-out permanently even when all cookies are deleted from your browser you can install their plugin [here](#). To opt out of interest-based ads on mobile devices, please follow these instructions for your mobile device: On android open the Google Settings app on your device and select "ads" to control the settings. On iOS devices with iOS 6 and above use Apple's advertising identifier. To learn more about limiting ad tracking using this identifier, visit the settings menu on your device.

To find out how Google uses data when you use third party websites or applications, please see [here](#).

**Facebook/Meta Analytics:** We may use tools provided by Meta, such as the Meta Pixel, advanced matching, and Conversions API. These allow us to measure ad performance and deliver ads that may be relevant to you on Meta platforms based on your activity on our website/app. You can control whether we can join data from third party partners with your Meta account for ads by adjusting your preferences within Meta's settings. You can disconnect this data from your Meta account by changing your settings for [Off-Facebook activity](#). For more information, please see Meta's Privacy Policy [here](#).

## Artificial Intelligence (AI) Technologies

### Overview

We use artificial intelligence and machine learning technologies in our business operations and services, including AI tools provided by third parties (such as VaultRE, TICA, CoreLogic and Inspra AI). We only use these technologies when legally permitted and necessary for our business.

### How we use AI

We may use AI technologies to:

- conduct analysis and data processing, including lead prioritisation
- improve and optimise our services and operations, including to assist with tenancy database searches
- automate routine tasks and communications, including routine calls
- personalise your experience with our services
- support quality assurance processes
- assist with customer support and queries

## Data protection and security

When we work with third-party AI providers, we ensure they handle your personal information in accordance with privacy laws through contractual requirements and appropriate safeguards.

## Your rights and our commitments

Any information generated or inferred about you by AI technologies is treated as personal information, and you maintain all the rights outlined in this privacy policy. When using AI with your personal information, we commit to:

### Transparency and control

- We'll inform you when AI is used to make decisions that may significantly affect you
- We maintain human oversight and review of significant AI-generated decisions
- Our staff are trained to understand AI limitations and verify outputs before relying on them
- We implement processes to verify the accuracy of AI-generated outputs

### Security

- We use appropriate technical and organisational measures to maintain the security and integrity of your personal information
- We regularly test and monitor AI outputs for accuracy and reliability

### Risk mitigation

- We regularly assess and document risks associated with using AI to process personal information
- We implement appropriate measures to address these risks
- We continuously monitor AI performance and regularly review their impact

## Links to other websites

Our website may contain links to other party's websites. We do not have any control over those websites, and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

## Amendments

We may, at any time and at our discretion, vary this Privacy Policy by publishing the amended Privacy Policy on our website. We recommend you check our website regularly to ensure you are aware of our current Privacy Policy.

**For any questions or notices, please contact us at:**

Multi Dynamic Pty Ltd (ABN 90 165 249 954)

Email: [compliance@multidynamic.com.au](mailto:compliance@multidynamic.com.au)

**Last update:** 5 May 2026

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