

PRIVACY POLICY - TITLES QUEENSLAND

Introduction

- (a) Queensland Titles Registry Pty Ltd (ACN 548 568 101) (**Titles Queensland, we, us, our**) is subject to the *Information Privacy Act 2009* (Qld) (**IPA**) as a public authority, in accordance with the *Queensland Future Fund (Titles Registry) Act 2021* (Qld). The IPA aims to safeguard the handling of an individual's personal information in the public sector environment, and provides for:
 - (i) the fair collection and handling of personal information by Titles Queensland; and
 - (ii) a right of access to, and amendment of, personal information in Titles Queensland's control, unless, on balance, it is contrary to the public interest to give the access or allow the information to be amended.
- (b) The IPA specifies 11 Information Privacy Principles (**IPPs**) with which Titles Queensland must comply.
- (c) The IPA (including the IPPs) governs how and when personal information may be collected, handled, stored, accessed, amended, transferred, used and disclosed by Titles Queensland in the performance of its functions, activities and services. Titles Queensland may also be subject to other laws in respect of the collection, handling, use or disclosure of personal information from time to time, based on its business functions. Collectively, these laws are the **Privacy Laws**.

Application

- (d) This policy applies to the collection of personal information by us, regardless of when it came into existence, and to the storage, handling, accessing, amendment, management, transfer, protection, use and disclosure of that personal information regardless of when it was collected.
- (e) This policy applies to all individuals and third parties Titles Queensland collects personal information from including but not limited to users of our services, visitors to our offices, users of our website, customers, potential employee candidates, current and past employees, and contractors (**Individuals, you, your**).
- (f) By providing personal information to us, you consent to the collection, use and disclosure of your personal information in accordance with this policy and any other arrangements that apply between us. We may change our policy from time to time by publishing changes on our website. We encourage you to check our website periodically to ensure that you are aware of our current policy.

Purpose of this policy

- (g) This policy explains how we handle your personal information by setting out:
 - (i) what information we collect;

- (ii) why we need to collect, use and disclose it;
 - (iii) how we collect it;
 - (iv) what we do with it;
 - (v) how it is stored and protected; and
 - (vi) who we might share it with.
- (h) This policy also describes how you can access or correct information we hold about you, how you can ask further questions or make a complaint, and information about our websites and online activities.

Our key responsibilities

Titles Queensland performs the functions relating to the land registry and water allocations register, including recording of all land-related transactions in Queensland (which includes domestic and foreign land ownership and interests, water allocations, leasehold registrations and title searches).

The information we collect

- (i) In delivering its functions, activities and services, Titles Queensland collects personal information from Individuals. Personal information is defined in the IPA to include information or an opinion about an individual whose identity is apparent (or reasonably able to be ascertained) from the information or opinion.
- (j) Personal information which we may collect is set out in Annexure A of this policy (**personal information**).
- (k) Relevant Privacy Laws (including the IPA and the IPPs) will not apply to information we collect:
 - (i) which cannot be linked to an identifiable Individual (and is therefore not personal information); or
 - (ii) where personal information has become de-identified to the extent that it no longer identifies an individual or is reasonably likely to enable the Individual's identification.
- (l) The types of personal information we may collect will vary depending on the capacity in which we are dealing with you. We limit our collection of personal information to those details necessary for the lawful function, activity or services of Titles Queensland.

Why we collect, use and disclose your personal information

- (m) We may collect, hold, use and disclose personal information about you:
 - (i) which is necessary to:
 - (A) administer and manage our functions, activities and services including (without limitation):
 - maintaining the register of land, which provides official records on proprietorship and interests in land and other related functions,

activities and services, and any other public register administered by us;

- providing information supply services or products to third parties, including information brokers;

- (B) consider applications and approaches you make to us;
- (C) maintain customer relationships;
- (D) contact you in respect of feedback you have provided to us where you have provided personal information for that purpose;
- (E) communicate with you and deal with or investigate any complaints or enquiries;
- (F) comply with statutory obligations or assist with any legal enforcement activity; and
- (G) where permitted, to send you marketing and promotional messages and other information that may be of interest to you, including where you have subscribed to a mailing list we operate;
- (H) undertake additional services conducted in connection with our functions, activities and services for the purposes of providing both new and related services, provided such additional services are conducted in compliance with relevant laws. This may include providing additional information supply services or products to third parties in respect of the information maintained on or derived from the public registers or otherwise managed or maintained by Titles Queensland;

(ii) if you are a potential employee or worker:

- (A) in order to assess your application (or an application submitted on your behalf by a recruitment service provider) for advertised positions;
- (B) in order to invite you to apply for future positions of interest with Titles Queensland, unless you notify us that you do not wish this occur. If you do not wish to receive information about future employment opportunities, please contact Titles Queensland's Human Resources team;
- (C) for Titles Queensland's reporting and analysis in relation to recruitment; and
- (D) in connection with Titles Queensland's management of any business risks, investigation, resolution and defence of complaints of legal claims, compliance with court orders and other legal obligations and regulatory requirements associated with the recruitment process; and

(iii) if you are a current or past employee, to manage the employment relationship and for employment-related administrative purposes,

(Functions).

- (n) It is at your discretion whether you provide Titles Queensland with this information. However, if a person decides not to provide requested information, it may not be possible for Titles Queensland to perform its Functions. In this circumstance, the Individual may be informed of the consequences of the information not being provided.

Method of collection of personal information

- (o) Personal information is to be collected in a way which is lawful, and fair. When collecting the information, Titles Queensland will take reasonable steps to ensure that:
 - (i) the information is relevant to the purpose for which it is collected, and is complete and up to date; and
 - (ii) the collection is not unreasonably intrusive to the privacy of the Individual concerned..
- (p) We may collect personal information either directly from you, from third parties or from publicly available sources of information.
- (q) We may collect this information when you:
 - (i) register to use any of the services offered by us (including on the website) in respect of the performance of our Functions;
 - (ii) request, purchase, process, enquire and/or register and confirm any services which may form part of our Functions;
 - (iii) communicate with us in the performance of our Functions;
 - (iv) interact with our sites, services and content in the performance of our Functions;
 - (v) complete applications and/or forms, surveys or questionnaires (including online); or
 - (vi) apply for employment with Titles Queensland.
- (r) When collecting information from an Individual, Titles Queensland will take reasonable steps to inform the Individual:
 - (i) why the information is being collected and how it is intended to be used;
 - (ii) Titles Queensland's authority to collect the information;
 - (iii) details of any third parties to whom Titles Queensland routinely gives the kind of information requested; and
 - (iv) any other relevant details that will help you to ensure we are protecting your privacy.

In some instances, we may direct you to this policy for this information.

Use and disclosure of personal information

- (s) We may only use your personal information for the purpose for which it was collected (or another directly related purpose), in the performance of our Functions, unless you agree to its use for another purpose.
- (t) We may disclose your personal for the purposes described in this policy to:
 - (i) our employees and related bodies corporate, agents and contractors;
 - (ii) third party suppliers and service providers (including providers for or in connection with the performance of our Functions or in connection with our website);
 - (iii) professional advisers (including without limitation, financial, tax and legal), dealers and agents;
 - (iv) payment systems operators (for example, merchants receiving card payments);
 - (v) our existing or potential agents, business partners or partners;
 - (vi) organisations to whom we outsource functions (including information technology providers, print service providers and mail houses);
 - (vii) anyone to whom our assets or businesses (or any part of them) are transferred;
 - (viii) specific third parties authorised by you to receive information held by us; and
 - (ix) where you otherwise agree to the disclosure as required by relevant Privacy Laws.
- (u) We reserve the right to use or disclose your personal information without your consent if the disclosure is:
 - (i) authorised by or required under a law (or, in relation to disclosure, is requested by ASIO);
 - (ii) required by a law enforcement agency for a purpose set out under IPP 10(1)(d) or IPP 11(1)(e) respectively; or
 - (iii) necessary to prevent a serious and imminent threat to a person's life, health or safety, or to public health or safety.
- (v) We may transfer or assign any of the information described in this policy to third parties as a result of a merger, consolidation, change of control, transfer of assets or reorganisation of Titles Queensland.
- (w) Titles Queensland will not disclose personal information collected from Individuals to others for the purpose of allowing others to direct market their products and services. We do not sell the information for marketing purposes to other organisations.

Online privacy

How we handle your personal information provided online

Accessing Titles Queensland's website at www.titlesqld.com.au will result in some information being logged, including the time of access, your IP address, and the pages viewed or accessed. This information cannot be used for identification purposes.

Our website may contain links to websites operated by third parties. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, or security of those linked websites, and have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ substantially from this policy, so we encourage Individuals to read them before using those websites.

Cookies

- (x) A 'cookie' is a packet of information placed on a user's computer by a website for record keeping purposes. Cookies are generally used by our website to:
 - (i) enhance browsing experience – if you log into our secure areas on our website we will use cookies to save your preferences and remember your user settings;
 - (ii) manage advertising – cookies are sometimes used to collect anonymous information about the page you visit and the type of software you are using; and
 - (iii) monitor traffic – we use anonymous information to track how people are using the Titles Queensland website. This may include time of visit, pages visited and some system information about the type of computer you are using.
- (y) You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent (each browser is different, so check the Help menu of your browser to learn how to change your cookie preferences).
- (z) If you disable the use of cookies on your web browser or remove or reject specific cookies from Titles Queensland websites or linked sites, then you may not be able to gain access to all of the content and facilities on those websites.

Email correspondence and feedback information

- (aa) Titles Queensland must comply with the *Public Records Act 2002* (Qld) (**PR Act**). In addition to any applicable provisions under Privacy Law, email correspondence sent to email addresses on our site, or information submitted via web forms on our site, will be treated as a public record and will be retained as required by the PR Act and other relevant legislation.
- (bb) Your name and address details will not be added to a mailing list nor will we disclose these details to third parties without your consent (except for correspondence to public email lists) unless required by law. Email messages may be monitored by our information technology staff for system trouble-shooting and maintenance purposes.

Secure online transactions

If you make a purchase through our website, we process your credit/debit card details securely over the internet using an accredited internet payment system. With the combination of SSL encryption on our website and a secure browser at your end, we take reasonable measures to ensure that your credit/debit card and personal information are protected when you make payments online.

Access and amendments to your personal information

Access to documents containing personal information

- (cc) You are entitled to request access to any record that contains your personal information. Titles Queensland will provide you access to your personal information, unless:
 - (i) access is restricted by Privacy Law or another relevant law; or
 - (ii) the relevant record:
 - (A) is produced in connection with the delivery of Titles Queensland's functions, activities and services or other legislated functions; and
 - (B) is ordinarily accessible only upon payment of a designated fee (such fee being set and charged in accordance with relevant legislation).
- (dd) In the event you would like Titles Queensland to delete, stop processing, or withdraw consent for, your personal information to the extent you are entitled to under applicable law, you can make such a request to us in writing.

Amendment of documents containing personal information

- (ee) You are entitled to seek an amendment of any record that contains your personal information if that information is inaccurate, incomplete, out of date or misleading. Subject to any limitations under Queensland law (including any requirement to make payment of a designated fee set and charged in accordance with relevant legislation), Titles Queensland will make the appropriate requested amendment.

Applications for access to or amendment of information

You may also have a right under the *Right to Information Act 2009* (Qld) to request access to and amendment documents that we hold, unless there is a good reason for it not to be provided. For further information, see our Right to Information Policy.

Complaints

How you can complain about our handling of your personal information

- (ff) A privacy complaint is a complaint made by an Individual about an act or practice of Titles Queensland in relation to that Individual's personal information.
- (gg) If you wish to lodge a privacy complaint, please:
 - (i) submit your complaint in writing;
 - (ii) state an address which we can use to contact you;
 - (iii) include details about the actions or practice you are complaining about; and

- (iv) mark your complaint to our Privacy Compliance Officer by emailing titlesinfo@titlesqld.com.au and marked as Private and Confidential.
- (hh) Titles Queensland will endeavour to respond to your concerns within 45 business days from the date your complaint is received.
- (ii) However, in some circumstances, a longer period may be required in order to finalise your complaint. If so, you will be contacted with a view to arranging an extension of time.
- (jj) On completion, you will be advised in writing of Titles Queensland's decision, including any remedies that are considered appropriate to resolve the complaint.

1.2 What happens if you are not happy with Titles Queensland's response to your complaint?

- (a) If you have made a complaint to Titles Queensland under the IP Act and you are not satisfied with the response you receive, you can refer your privacy complaint to the Office of the Information Commissioner (**OIC**).
- (b) However, note that your complaint can only be made to the OIC after 45 business days has lapsed from the date the complaint was received by Titles Queensland.
- (c) Refer to the following website for further information www.oic.qld.gov.au/about/privacy/privacy-complaints

Further information

For general enquiries on the operation and application of Queensland's right to information and Privacy Laws, please contact:

- (d) OIC enquiry service:
 - (i) Telephone: (07) 3234 7373
 - (ii) Fax: (07) 3405 1122
 - (iii) Email: enquiries@oic.qld.gov.au
 - (iv) Website: www.oic.qld.gov.au

Annexure A - Personal information

Customer personal information

We may collect, hold, use and/or disclose the following types of personal information:

- (a) name;
- (b) billing, mailing and/or street address;
- (c) email address;
- (d) telephone number and other contact details;
- (e) age or date of birth;
- (f) gender;
- (g) financial information, including credit card information;
- (h) drivers licence details and other forms of personal identification;
- (i) your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;
- (j) details of the Functions we have provided or will provide to you or that you have enquired about, including any additional information necessary to deliver those Functions and respond to your enquiries;
- (k) any additional information relating to you that you provide to us directly through the Functions (including our website) or indirectly through your use of our services in the performance of our Functions, the app, online presence or through other websites or accounts from which you permit us to collect information;
- (l) information you provide to us through customer surveys or questionnaires;
- (m) information about you that is included or is to be included in the public registers we manage;
- (n) information collected through forms, documents or processes which are connected to Titles Queensland products or services, but which are not otherwise available on public registers; and/or

any other personal information that may be required in order to facilitate your dealings with us in the performance of our Functions.

Employee personal information

In respect of potential, current or past employees, we may collect, hold, use and/or disclose the following types of personal information in accordance with this policy and the relevant Privacy Law:

- (a) prior employment history and records through reference checks;
- (a) eligibility to work in Australia through a visa status check;
- (b) educational qualifications by requesting confirmation of qualifications or results from an academic institution;

- (c) trade, skill, aptitude or other psychometric testing;
- (d) criminal record history check and/or working with children check;
- (e) applications for employment; and
- (f) employee records which may include:
 - (i) personal details, including home address, emergency contact, next of kin;
 - (ii) records relating to attendance and overtime;
 - (iii) leave applications, approvals and records;
 - (iv) medical records;
 - (v) payroll and pay related records, including banking details, tax file number, salary packaging arrangements, payroll deductions;
 - (vi) performance management information;
 - (vii) declarations of pecuniary interests;
 - (viii) performance appraisals;
 - (ix) records relating to personal development and training;
 - (x) travel documentation;
 - (xi) superannuation details;
 - (xii) records of accidents and injuries;
 - (xiii) incident reports on acts of violence or threats by clients, which may contain employee and client details;
 - (xiv) compensation case files;
 - (xv) rehabilitation case files;
 - (xvi) records relating to counselling and discipline matters;
 - (xvii) complaints about employee members;
 - (xviii) grievances;
 - (xix) recommendations for reward and recognition;
 - (xx) details of mobile phones assigned to staff members;
 - (xxi) details of fleet vehicles assigned to staff members, including personal details of staff allocated vehicles overnight; and
 - (xxii) photos for employee identity cards.

Note: If you are a potential employee or worker, and you are offered employment with Titles Queensland, as a condition of employment we may ask you to provide evidence of your identity and legal entitlement to work in Australia. We will also ask for personal information, such as emergency contact details, your tax file number and your bank account details. These will form part of your employee file.

Other personal information

- (a) We are required to collect, manage, use and disclose personal information in accordance with various legislation, policies, procedures and administrative reasons in the course of our day-to-day activities and in the performance of our Functions.
- (b) Titles Queensland also manages registers containing personal information, which include, but are not limited to:
 - (i) Water Allocations Register;
 - (ii) Land Register;
 - (iii) corporate records / financial management records; and
 - (iv) consultant / contractor / supplier records.
- (c) Titles Queensland may also deal with personal information in administering its legislative responsibilities under legislative instruments including:
 - (i) *Aboriginal Land Act 1991 (Qld)*;
 - (ii) *Building Units and Group Titles Act 1980 (Qld)*;
 - (iii) *Building Units and Group Titles Regulation 2008 (Qld)*;
 - (iv) *Crime and Corruption Act 2001*;
 - (v) *Criminal Proceeds Confiscation Act 2002 (Qld)*;
 - (vi) *Electronic Conveyancing National Law (Queensland) Act 2013 (Qld)*;
 - (vii) *Fire and Emergency Services Act 1990 (Qld)*;
 - (viii) *Foreign Ownership of Land Register Act 1988 (Qld)*;
 - (ix) *Forest Wind Farm Development Act 2020 (Qld)*;
 - (x) *Forestry Act 1959 (Qld)*;
 - (xi) *Guardianship and Administration Act 2000 (Qld)*;
 - (xii) *Human Rights Act 2019*;
 - (xiii) *Information Privacy Act 2009*;
 - (xiv) *Integrated Resort Development Act 1987 (Qld)*;
 - (xv) *Justice Legislation (COVID-19 Emergency Response – Proceedings and Other Matters) Regulation 2020 (Qld)*;
 - (xvi) *Land Act 1994 (Qld)*;
 - (xvii) *Land Regulation 2020 (Qld)*;
 - (xviii) *Land Title Act 1994 (Qld)*;
 - (xix) *Mineral and Energy Resources (Common Provisions) Act 2014 (Qld)*;
 - (xx) *Mineral Resources Act 1989 (Qld)*;

- (xxi) *Mixed Use Development Act 1993 (Qld)*;
- (xxii) *Nature Conservation Act 1992 (Qld)*;
- (xxiii) *Planning Act 2016 (Qld)*;
- (xxiv) *Property Law Act 1974 (Qld)*;
- (xxv) *Property Law Regulation 2013 (Qld)*;
- (xxvi) *Public Records Act 2002*;
- (xxvii) *Queensland Future Fund (Titles Registry) Act 2021 (Qld)*;
- (xxviii) *Recreation Areas Management Act 2006 (Qld)*;
- (xxix) *Right to Information Act 2009*;
- (xxx) *Retirement Villages Act 1999 (Qld)*;
- (xxxi) *River Improvement Trust Act 1940 (Qld)*;
- (xxxii) *Salvation Army (Queensland) Property Trust Act 1930 (Qld)*;
- (xxxiii) *Sanctuary Cove Resort Act 1985 (Qld)*;
- (xxxiv) *South Bank Corporation (Modified Building Units and Group Titles) Regulation 2014 (Qld)*;
- (xxxv) *South Bank Corporation Act 1989 (Qld)*;
- (xxxvi) *South Bank Corporation Regulation 2014 (Qld)*;
- (xxxvii) *Stock Route Management Act 2002 (Qld)*;
- (xxxviii) *Sugar Industry Act 1999 (Qld)*;
- (xxxix) *Survey and Mapping Infrastructure Act 2003 (Qld)*;
- (xl) *Torres Strait Islander Land Act 1991 (Qld)*;
- (xli) *Water Act 2000 (Qld)*;
- (xlii) *Water Regulation 2016 (Qld)*; and
- (xlili) any other legislation, as may be amended from time to time, under which Titles Queensland deals with personal information in administering its delegated legislative responsibilities.

Note: The above legislation can be accessed at:
<https://www.legislation.qld.gov.au/browse/inforce>.

Annexure B: Terms of Use

Disclaimer

This website is owned and operated by Queensland titles Registry Pty Ltd. By viewing this website you agree to be bound by all the terms and conditions in this Disclaimer. Titles Queensland may change these terms at any time without notice, and by continuing to access or use the website you accept any changed terms as they may apply from time to time. Unless expressly stated otherwise, Titles Queensland is the only entity responsible for the content of the information on this website (the "Information").

Information subject to change

The Information is subject to change at any time at Titles Queensland's discretion with or without prior notice and Titles Queensland is under no obligation to notify any person of any change, including anyone who has printed or had access to a hard copy of the Information. It is recommended that you review the Information provided on or via this website, including this Disclaimer, periodically for changes. Titles Queensland will endeavour to ensure that information is updated as soon as practicable when it becomes aware that material changes have occurred.

No warranty

Titles Queensland makes not statement, representation or warranty (other than those made in accordance with legislation) about the accuracy, completeness, context or quality the Information (including the accuracy of underlying assumptions) and to the extent permitted by law, disclaim all responsibility and liability for all expenses, losses or damages and costs of any nature whatsoever which may be suffered by any person directly or indirectly through relying upon the Information, whether that loss or damage is caused by any fault or negligence of Titles Queensland.

To the extent permitted by law, Titles Queensland also disclaim all responsibility and liability for any loss or damage of any nature whatsoever (and including consequential loss) which may be suffered by accessing this website, including the transmission of any computer virus. Without limiting the above matters, Titles Queensland does not warrant the accuracy, completeness or currency of information contained on any website which may be linked to this website.

Links are not recommendations

The inclusion of links on this website to other websites does not comprise or imply support or recommendation of any other company, product or service. We do not control and are not responsible for the information on any other website (other than those with addresses ending with "titlesqld.com.au" found through our site. Links to this website are not permitted without the prior written consent of Titles Queensland.

No warranty of uninterrupted operation

Titles Queensland makes no warranty that the use or operation of this website will be uninterrupted or error free or that the website is suitable for any particular purpose or has any performance, functionality or security features except as we are required to provide by law. To the extent permitted by law, Titles Queensland's liability is limited to resupplying the services accessible through this website.

Severability

If the whole or any part of a provision of this Disclaimer is void, unenforceable or illegal in a jurisdiction it is severed for that jurisdiction. The remainder of the Disclaimer has full force and effect and the validity or enforceability of that provision in any other jurisdiction is not affected. This clause has no effect if the severance alters the basic nature of the Disclaimer or is contrary to public policy.

Use of website

Neither the website nor any software, hardware, application, interfaces and network communication device provided in relation to the website (the Equipment) may be used for the purpose of providing advice to any other person.

No user of the website may, without Titles Queensland's prior written consent:

- (a) decompile, reverse engineer or disassemble the Equipment or the website; or
- (b) sell, redistribute, transmit, circulate, disseminate, translate or reduce to or from any electronic medium or machine readable form any data or information provided to the user through the Equipment or the website to any other person.

Intellectual Property

Titles Queensland owns and retains all rights (including copyrights, trademarks, patents as well as any other intellectual property right) in relation to all Information, or has a licence or agreement to use that Information where it is owned by someone else. You may only reproduce the Information for personal or non-commercial use, and it must not be reproduced, stored, distributed or transmitted to any other person, in any form or by any means (electronic, mechanical, photocopying, recording or otherwise), or used in any other way without the prior written consent of Titles Queensland (except to the extent permitted by law).

Agreement to terms of privacy policy

Information provided to us through this website will be collected, used, and disclosed in accordance with, and for the purposes described in, Titles Queensland's Privacy Policy. We review our policies regularly and occasionally may need to change or update them. Any updated versions of this Privacy Policy will be posted on our website and will be effective from the date of posting.

If you have any complaints in relation to Titles Queensland's handling of your personal information, you can make a complaint to us directly. Titles Queensland will aim to ensure that we contact you and that your complaint is resolved within a reasonable time (as permitted by law). In the event you are not satisfied with the response you receive, you can refer your privacy complaint to the Office of the Information Commissioner directly. For more information, please see Titles Queensland's Privacy Policy.

Annexure C: Right to Information

You may, at any time, request access to any personal information that we hold about you by contacting us titlesinfo@titlesqld.com.au. Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by posting or emailing it to you). We may charge you a reasonable fee to cover our administrative and other reasonable costs in providing the information to you. Some information we hold may be contained within records which are produced in connection with our delivery of legislative functions, activities or services. In accordance with relevant legislation, we may charge a fee for the provision of such records.

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for our refusal.

In circumstances where a document contains the personal or commercial information of more than one person, the information will only be accessible when all parties have given their prior written consent.

If you believe that any personal information that we hold about you is incorrect, incomplete or inaccurate, then you may request that we correct it. We will consider if the information requires correction. If we do not agree that there are grounds for correction, then you may request that we add a note to the personal information stating that you disagree with it.