

PRIVACY POLICY

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Policy Snapshot

This Policy embodies Titles Queensland's commitment to protecting the Personal Information held by Titles Queensland, including when carrying out the delegated functions relating to the Registers maintained by Titles Queensland. This Policy satisfies the requirements under Queensland Privacy Principle 1 (QPP 1) in the *Information Privacy Act 2009* (Qld) to take reasonable steps to ensure that people can find out the type of Personal Information held by Titles Queensland and how Titles Queensland collects, holds, uses and discloses that Personal Information. This Policy also satisfies the corresponding requirements under Australian Privacy Principle 1 in the *Privacy Act 1988* (Cth).

1. Policy objective

Queensland Titles Registry Pty Ltd ACN 648 568 101 (**Queensland Titles Registry**), QFF Registry No. 1 Pty Ltd ACN 647 902 314 as trustee for the Registry Hold Trust (**QFF Registry**) and Registry Finance Pty Ltd ACN 645 947 226 (**Registry Finance**) (collectively, **Titles Queensland, we, us**) perform functions relating to the land register, water allocations register and other registries, including recording all land-related transactions in Queensland, domestic and foreign land ownership and interests, water allocations and leasehold registrations.

Titles Queensland is committed to protecting your privacy. This Policy outlines Titles Queensland's obligations regarding the collection and management of Personal Information. The Titles Queensland entities described above are governed by either the

Information Privacy Act 2009 (Qld) (**IPA**) or the *Privacy Act 1988* (Cth) (**Privacy Act**), as follows:

- (a) As a public authority under the Enabling Act, Queensland Titles Registry is subject to the *Queensland Privacy Principles* in the IPA in relation to how it collects, stores, provides access to, uses and discloses Personal Information in connection with all activities relating to management and operation of the Registers performed by Queensland Titles Registry.
- (b) QFF Registry and Registry Finance are subject to the *Australian Privacy Principles* in the Privacy Act to the extent that these entities collect, store, access, use and disclose Personal Information in connection with the corporate or financing functions of Titles Queensland. These entities generally only handle Personal Information to the extent necessary to fulfil those functions.

2. Roles and Responsibilities

This Policy applies to all individuals that Titles Queensland collects Personal Information from or about, including users of Titles Queensland services (for example, individuals who register interests on the registers in Queensland, lodgers and individuals purchasing products), visitors to Titles Queensland offices, users of Titles Queensland websites or other websites administered by Titles Queensland (for example the ARNECC website), potential, current and past Employees and all contractors (**you, your**).

Titles Queensland may change this Policy from time to time. A link to the most current version of this Policy will be available on the Titles Queensland website. We encourage you to check the website periodically to ensure that you are aware of the current policy.

3. Key terms/ definitions

Employees	means all employees and contractors of Titles Queensland, whether on a full time, part time or casual basis.
Enabling Act	means <i>Queensland Future Fund (Titles Registry) Act 2021</i> (Qld) as amended from time to time.
Personal Information	means information or an opinion about an identified individual or an individual who is reasonably identifiable from the information or opinion: (a) whether the information or opinion is true or not, and (b) whether the information or opinion is recorded in a material form or not.
Policy	means this Privacy Policy, as amended from time to time.
Registers	means: (a) Register of Titles under the <i>Land Title Act 1994</i> (Qld); (b) Register of Water Allocations under the <i>Water Act 2000</i> (Qld);

- (c) Foreign Ownership of Land Register under the *Foreign Ownership of Land Register Act 1988* (Qld); and
- (d) any other statutory register maintained by Titles Queensland from time to time.

Sensitive Information

means:

- (a) information or an opinion about an individual's:
 - (i) racial or ethnic origin; or
 - (ii) political opinions; or
 - (iii) membership of a political association; or
 - (iv) religious beliefs or affiliations; or
 - (v) philosophical beliefs; or
 - (vi) membership of a professional or trade association; or
 - (vii) membership of a trade union; or
 - (viii) sexual orientation or practices; or
 - (ix) criminal record;
- (b) health information about an individual; or
- (c) genetic information about an individual that is not otherwise health information; or
- (d) biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or
- (e) biometric templates.

4. Collecting Personal Information

Titles Queensland may collect the following types of Personal Information:

- (a) name, address, age or date of birth, contact details (including phone and email) and signature;
- (b) information collected in connection with the Registers, including information:
 - (i) about real property titles, interests and other dealings connected to you;
 - (ii) to amend a land titles or water allocation record or other interest recorded in a Register (for example a statutory declaration containing a passport, or marriage certificate deposited with a lodged form); and
 - (iii) related to a lodgement or process which is not recorded on a Register (for example financial information in a Form 24 or a will deposited with a form);
- (c) information collected by way of mail, email, website form, drop box, in person, over the telephone, via eLodgement, Titles Electronic Dropbox (TED) or Online Title and Image Searches (OTIS), including name, contact details, the enquirer's circumstances (which may include Sensitive Information), interactions with Titles Queensland, bank account details or credit card information, or identity documents;
- (d) Photographs and/or video footage of you, including Sensitive Information captured by our closed-circuit TV (CCTV) system when you attend Titles Queensland

premises in person;

- (e) your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from Titles Queensland owned or controlled websites, advertising data, IP address and standard web log information;
- (f) demographic information including device usage, job function, industry, location, seniority and company size when engaging with Titles Queensland's LinkedIn profile;
- (g) information you provide through customer and employee surveys and feedback;
- (h) information you provide when engaging with Titles Queensland via social media;
- (i) information about people who make complaints to Titles Queensland about our services, or otherwise contacts the Titles Queensland customer service team, including name, contact details, interactions with Titles Queensland, expressions of dissatisfaction, investigations into complaints and the outcomes of complaints, which may include Sensitive Information;
- (j) any other information that may be required to facilitate your dealings with Titles Queensland (for example drivers licence details and personal identification used to verify your identity).

Titles Queensland will only collect Sensitive Information where we are required or authorised to by law, or where the collection is reasonably necessary for or directly related to one or more of the functions or activities of Titles Queensland. For example, you may provide Sensitive Information to demonstrate your eligibility to access services that expedite the examination or registration of a document. Titles Queensland will generally only collect Sensitive Information directly from the individual it is about or with their consent, or otherwise in accordance with the IPA and/or the Privacy Act.

If a person applies for employment or is employed, Titles Queensland may collect the following additional types of Personal and Sensitive Information:

- (a) prior employment history, reference checks, education and qualifications;
- (b) eligibility to work in Australia and criminal history;
- (c) emergency contact, next of kin and medical information and records;
- (d) tax file number, bank details, superannuation details and financial information;
- (e) photographs and signatures for identification;
- (f) membership of a professional or trade association or trade union; and
- (g) health information and other information relevant to the person's employment about gender, age, disability, nationality, racial or ethnic origin, family and relationship status, religious beliefs and gender identity.

Unsolicited Personal Information

Where Titles Queensland receives unsolicited Personal Information, the information will be assessed to determine whether it could have been collected and if not, and if it is not a public record under the *Public Records Act 2023* (Qld), Titles Queensland will, as soon as

practicable, destroy or de-identify the unsolicited personal information, to the extent it is lawful and reasonable to do so.

Titles Queensland does not collect biometric information from customers and if biometric information is provided to Titles Queensland, such as fingerprints, these will be immediately deidentified upon receipt.

5. How Personal Information is collected

Directly from you

Titles Queensland may collect Personal Information directly from you or your authorised representative (such as a solicitor, surveyor, broker etc.) when you lodge dealings with Titles Queensland, access a product or service, when you visit Titles Queensland's offices, or when you contact Titles Queensland by phone, mail, email or through the Titles Queensland website, including any forms.

From Third Parties

Titles Queensland may also collect Personal Information about you from third parties, including third parties who access or otherwise interact with the Registers. This includes when Titles Queensland audits third party operators such as Electronic Lodgment Network Operators who provide services to electronically lodge dealings with Titles Queensland, information brokers, and other government authorities.

In addition, when a person applies for employment, Titles Queensland may collect certain information about them (including name, contact details, working history and relevant records check) from recruitment consultants, previous employers and others who may be able to provide information to assist in the hiring decision.

6. Use and disclosure of Personal Information

Titles Queensland collects, holds, uses and discloses your Personal Information for the purposes of registry operations and associated activities, including:

- (a) administering and maintaining the Registers and meeting any associated statutory obligations (for example to verify your identity in a particular dealing). These activities may involve the use of automated decision making and artificial intelligence tools in the examination and registration process, engaging with Customers and business analytics;
- (b) to provide products and services, including:
 - (i) registration services, and titling and plan services as well as services related to registry services, such as Fast Track and Pre-Examination services;
 - (ii) the supply of information, including:
 - (A) information maintained on a Register or verifying third party information;
 - (B) combining the information maintained on the Register with other data

- sources, whether maintained by Titles Queensland or publicly available;
- (C) developing alerts, notices or other services based on activity on the Register; and
- (D) the combination, compilation, integration or analysis of information to facilitate information supply services or to create reports and insights;
- (iii) the supply of information to third parties:
 - (A) including information brokers or information services provided directly to third parties; and
 - (B) including commercialisation of information held in the registry or by Titles Queensland, pursuant to section 8(d) of the *Queensland Future Fund (Titles Registry) Act 2021* (Qld).
- (c) for Titles Queensland's internal administrative, business and operational purposes including:
 - (i) eLodgement, Titles Electronic Dropbox (TED) and OTIS logins and portals,
 - (ii) analytics to support registry functions and understand use of products and services, quality assurance, enhance internal processes and service delivery;
 - (iii) staff training, workflow monitoring and operational reporting; and
 - (iv) training artificial intelligence technologies;
- (d) communicating with you and other customers, considering feedback and complaints, and providing you with marketing and promotional material and other updates (including by administering Titles Queensland mailing lists);
- (e) to maintain the safety and security of Titles Queensland's premises, staff, contractors, service providers and visitors;
- (f) considering employment applications;
- (g) undertaking audits of Electronic Lodgment Network Operators and other third parties who access a Register, or complying with audits of Titles Queensland systems by government authorities or auditors;
- (h) as required or authorised by law (for example providing Personal Information as required by the Land Title Act 1994 in a public search or to the Valuer General, Queensland Revenue Office, local councils, other rating authorities and utilities); and
- (i) resolving any dispute that Titles Queensland has with any user or to enforce Titles Queensland agreements with third parties.

7. Direct marketing

Titles Queensland may use your personal information to send you marketing communications about our products and services where you have opted in to these communications. You can opt out or update your marketing preferences at any time by

using the unsubscribe feature in our marketing emails, updating your preferences in our preference centre or emailing info@titlesqld.com.au.

Titles Queensland will not provide your personal information to third parties for their own marketing activities.

8. Use of automated decision making and artificial intelligence

Titles Queensland is committed to the responsible and ethical use of artificial intelligence (AI) technologies. We may utilise AI, data analytics and other technologies with respect to your Personal Information from time to time to facilitate, support and enhance the way we operate the registers, the provision of the products and services we provide to you, and for other lawful purposes including as described in this Policy. This includes automating some titles registry functions, allowing advanced data analysis and development of insights to inform decision-making; enhanced search and retrieval of documents and information from large information repositories; improving regulatory compliance functions; optimising the provision of services and improving interactions with our customers.

9. Disclosure of Personal Information

Titles Queensland may disclose Personal Information for the purposes described in this Policy to:

- (a) Titles Queensland's employees, related bodies corporate and shareholders;
- (b) third party suppliers and service providers (including IT providers);
- (c) professional advisers, dealers and agents;
- (d) payment systems operators (for example merchants receiving card payments);
- (e) Titles Queensland's existing and potential agents, business partners or vendors;
- (f) anyone to whom Titles Queensland's assets or business (or any part thereof) are transferred;
- (g) third parties that you authorise to receive information held by Titles Queensland;
- (h) third parties set out in this Policy, including authorised deposit-taking institutions, credit reporting bureaus, information brokers, information service providers and electronic lodgement network operators;
- (i) other persons, including government agencies (for example the Registrar General), regulatory bodies and law enforcement agencies, or as otherwise required, authorised or permitted by law; and
- (j) the State of Queensland and associated State government entities and agencies.

Titles Queensland has licensing arrangements with information brokers which allows them access to information on Registers and use of the data collected by Titles Queensland. Titles Queensland also has licensing arrangements with other third parties for products and services, including the commercialisation of information pursuant to s8(d) of the

Enabling Act. Use of any Personal Information by those third parties is subject to strict use restrictions in the relevant agreement they have with Titles Queensland.

Titles Queensland may also seek your consent from time to time to disclose Personal Information for purposes not set out in this Policy. In some cases, if you do not consent, Titles Queensland may not be able to provide some products and services to you.

10. Storing Personal Information

Titles Queensland holds Personal Information in either electronic or hard copy form. Titles Queensland takes reasonable steps to protect all Personal Information it holds from loss, misuse, interference or unauthorised access, disclosure, modification or destruction and uses various physical, administrative, personnel and technical controls to protect Personal Information.

11. Disclosure of Personal Information outside Australia

Although Titles Queensland generally does not disclose Personal Information in connection with the operation of the Registers outside of Australia other than where permitted to do so, QFF Registry and Registry Finance may, from time to time, share some types of Personal Information relevant to their functions with third parties located overseas. It is not practicable to list in this policy the countries in which these third parties may be located.

The Registers that Titles Queensland manages are public as required by law, and Personal Information will be disclosed outside of Queensland and Australia where persons searching the Registers are located outside of Queensland and Australia.

12. Accessing or correcting your Personal Information

You can access the Personal Information we hold about you by contacting us using the information below. Sometimes, we may not be able to provide you with access to all of your Personal Information and, where this is the case, we will tell you why. We may also need to verify your identity when you request access to your Personal Information.

If you think that any Personal Information we hold about you is inaccurate, please contact us at privacy@titlesqld.com.au and we will take reasonable steps to ensure that it is corrected.

More information about accessing your Personal Information can be found in the Titles Queensland's Right to Information Policy at www.titlesqld.com.au/policies.

13. Dealing with Titles Queensland anonymously or using a pseudonym

You can deal with Titles Queensland anonymously or by using a pseudonym where this is reasonably practicable. Enquiries to and complaints about Titles Queensland can be made anonymously or by using a pseudonym but, depending on the nature of the enquiry

or complaint, Titles Queensland may not be able to action an enquiry, complaint and/or provide a response without a person's identity.

Anonymous or pseudonymous interaction is not possible for other Titles Queensland functions, such as titles registry dealings, due to legislative requirements to collect information such as name and contact details to carry out the titles registry function.

14. Complaints

If you have a concern about how your Personal Information is being collected, stored, used or disclosed, or that Titles Queensland has not complied with applicable privacy laws, you may make a complaint to Titles Queensland.

Your complaint must be in writing and sent to privacy@titlesqld.com.au, and include details about your concerns and/or the actions of Titles Queensland. All complaints will be acknowledged on receipt and Titles Queensland representatives will respond to you within 45 business days.

Titles Queensland will ensure that the complaint is properly understood and will seek clarification or further information if necessary. Once all necessary information has been obtained, complaints will be assessed based on the information that you have provided and any information obtained through independent investigation.

If you think that we have failed to resolve the complaint satisfactorily, we will provide you with information about the further steps you can take.

15. How to contact us

For further information about our Privacy Policy or practices, to access or correct your Personal Information, or to make a complaint, please contact us at privacy@titlesqld.com.au or Privacy Officer, GPO Box 1401, Brisbane, QLD 4001.