



Build for Compliance. Designed for Growth.

PROPERTY360

AML Compliance Portal

PRIVACY POLICY

Version 1.0 | Effective 30 May 2026

1. INTRODUCTION

Property360 (operated by Business Advice Agency Pty Ltd, ABN 56 637 480 132) is committed to protecting the privacy of personal information collected through the Property360 AML Compliance Portal.

This Privacy Policy explains how we collect, use, store, disclose and protect personal information in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs).

By using the Property360 platform, you consent to the collection and use of personal information as described in this policy.

2. WHAT PERSONAL INFORMATION WE COLLECT

2.1 Information About Platform Users (Agents, COs, Principals)

- Full name
- Email address
- Password (stored in encrypted/hashed form — never in plain text)
- Login activity logs (date, time, IP address, portal type)
- Two-factor authentication codes (temporary — not stored after use)

2.2 Information About Property Transaction Clients

For each property transaction compliance report, we collect the following information about the client being verified:

- Full legal name (first, middle and last name)
- Date of birth
- Residential address
- Phone number
- Email address
- Entity type (individual, company, trust, etc.)
- Identity document details (type, number, expiry date)
- Scanned identity documents (uploaded securely to Vercel Blob storage)
- Beneficial owner information
- Source of funds information
- AML/CTF risk assessment responses
- GreenID digital identity verification results and reference numbers

2.3 Information We Do NOT Collect

- Credit card or payment details (processed directly by Stripe — not stored by Property360)
- Tax File Numbers

- Biometric data (facial scan data is processed and stored by GreenID/GBG — not by Property360)

3. HOW WE COLLECT PERSONAL INFORMATION

We collect personal information:

- Directly from platform users when they create accounts or submit compliance reports.
- From subscribing agencies on behalf of their clients (as the agency's data processor).
- Via the GreenID identity verification service (results returned to the platform after client completes verification).
- Automatically through login activity logging for security and audit purposes.

4. WHY WE COLLECT PERSONAL INFORMATION

We collect personal information for the following purposes:

- To enable real estate agencies to comply with their obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth).
- To facilitate digital identity verification of property transaction clients via GreenID.
- To provide access to the Property360 compliance management platform.
- To maintain security audit logs as required by Australian AML/CTF regulations.
- To send email notifications related to compliance report status changes.
- To process subscription payments via Stripe.
- To comply with our own legal obligations under the Privacy Act 1988 (Cth).

5. HOW WE STORE AND PROTECT PERSONAL INFORMATION

5.1 Storage Location

Australian Data Residency

All personal information stored in the Property360 database is held in Australia using Supabase (Sydney region — ap-southeast-2). This ensures compliance with Australian data residency expectations under the Privacy Act 1988 (Cth).

5.2 Security Measures

Property360 employs the following security measures to protect personal information:

- All passwords are hashed using bcrypt (cost factor 12) — passwords are never stored in plain text.
- All data transmission uses TLS/HTTPS encryption.
- Two-factor authentication is required for Compliance Officer, Principal and Administrator access.

- Session timeout of 45 minutes for all portal users.
- Rate limiting and account lockout after failed login attempts.
- Cloudflare DDoS protection and Web Application Firewall.
- Row Level Security on the database — each agency can only access its own data.
- Audit logging of all login events.

5.3 Data Retention

Personal information is retained as follows:

- AML/CTF compliance records: minimum 7 years from the date of the transaction, in accordance with the AML/CTF Act 2006.
- Login activity logs: 12 months.
- Identity documents uploaded to the platform: 7 years from upload date.
- Cancelled account data: 30-day export window, then archived for 7 years, then securely deleted.

6. DISCLOSURE OF PERSONAL INFORMATION

6.1 Third Party Service Providers

We disclose personal information to the following third parties as necessary to provide our services:

Provider	Purpose	Location
Supabase	Database hosting and storage	Australia (Sydney)
Vercel	Application hosting and document storage	Australia / Global CDN
GBG / Equifax (GreenID)	Digital identity verification (VOI)	Australia
Resend	Transactional email notifications	USA (GDPR compliant)
Anthropic (Claude)	AI-assisted compliance analysis	USA (enterprise privacy)
Stripe	Payment processing	USA (PCI DSS compliant)
Cloudflare	Security, DNS and CDN	Global

6.2 Regulatory Disclosure

We may disclose personal information to AUSTRAC or other government authorities where required by law, including in response to lawful requests, court orders or regulatory investigations.

6.3 No Sale of Personal Information

Property360 does not sell, rent or trade personal information to third parties for marketing purposes under any circumstances.

7. GreenID IDENTITY VERIFICATION

When the GreenID digital identity verification service is used:

- The client's name, date of birth, address and email are transmitted to GBG/Equifax for the purpose of identity verification.
- The client receives a verification link by email and completes the process directly with GreenID.
- Facial biometric data (selfie and document scan) is processed and stored by GBG/Equifax under their own privacy policy — not by Property360.
- GreenID returns a verification result (Verified/Failed/Pending) and a unique Verification ID to Property360, which is stored on the compliance file.
- The client is notified that their information will be checked against government and commercial databases as part of the AML/CTF compliance process.

8. NOTIFIABLE DATA BREACHES

Property360 is subject to the Notifiable Data Breaches (NDB) scheme under the Privacy Act 1988 (Cth). In the event of an eligible data breach that is likely to result in serious harm, Property360 will:

- Notify the Office of the Australian Information Commissioner (OAIC) as soon as practicable.
- Notify affected individuals as soon as practicable.
- Take immediate steps to contain and remediate the breach.

To report a suspected data breach, contact: admin@property360.online

9. YOUR RIGHTS

Under the Privacy Act 1988 (Cth), you have the right to:

- Request access to personal information we hold about you.
- Request correction of inaccurate or incomplete personal information.
- Make a complaint about how we handle your personal information.

To exercise these rights, contact us at admin@property360.online. We will respond within 30 days.

If you are not satisfied with our response, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC) at www.oaic.gov.au.

10. COOKIES AND ANALYTICS

The Property360 platform uses session-based authentication only. We do not use tracking cookies or third-party analytics platforms. Login sessions are managed server-side and expire after 45 minutes of inactivity.

11. CHANGES TO THIS POLICY

Property360 may update this Privacy Policy from time to time. We will notify subscribers of material changes via email with at least 30 days notice. The current version of this policy is always available at aml.property360.online.

12. CONTACT US

Privacy Contact

Privacy Officer Property360 / Business Advice Agency Pty Ltd ABN: 56 637 480 132 Email: admin@property360.online Website: <https://property360.online>