

**PERSONAL IDENTIFICATION INFORMATION  
IN PROPERTY DATA CODE OF CONDUCT  
(QVAS CODE OF CONDUCT)**

**ANNUAL REPORT 2009/2010**

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## **Chair's message**

The QVAS Code of Conduct commenced on 1 October 2009 but it is important to recognise that, well before its launch date, the creation of the Code of Conduct was the result of the work of industry, government, and concerned members of the community. The Code is an example of how industry can self-regulate its conduct in collaboration with government and the community.

Their aim was to find a solution to meet community and industry needs and expectations about the access to, and use of, personal identification information contained in the QVAS electronic database. This database is maintained by the Queensland Department of Environment and Resource Management (DERM).

The Code Oversight Committee is responsible for the Code of Conduct's administration, compliance and enforcement. It is comprised of an independent chair nominated by the Minister for Natural Resources, a consumer representative nominated by the Office of Fair Trading, and an industry representative.

In early 2010, in consultation with government, the name of the Code was changed, from the "QVAS Code of Conduct" to the "Personal Identification Information in Property Data Code of Conduct". This was done to help provide the public with clear information about the focus and purpose of the Code.

Also of particular significance was the formation by the Code Subscribers of their own association, the Value Added Property Information Broker Association (VAPIBA) Incorporated. The formation of the Association was essential to provide a firm foundation for the ongoing operation of the Code which is fully funded by the industry members.

The launch of the Code's website in October 2010 will enhance community and industry awareness of the Code of Conduct and the benefits available to those concerned about their personal information in property data.

I would like to express my gratitude to my fellow Committee members, Kris Day and Kris Matthews, who have contributed time, energy and leadership to the work of the Committee in implementing the Code and responding to the challenges that always occur with new ventures and entities.

On behalf of the Committee as a whole, our thanks go to the information brokers who have joined the Code as Code Subscribers. Their personal, organisational, and financial commitment to the Code have made it a reality. The spirit of cooperation and collaboration that has existed from the start has made the necessary tasks much easier.

We are also most grateful to those who have lodged complaints with the Committee. Complaints are critical to us understanding whether or not we are achieving our objectives and we learn and grow in our capacity to achieve those objectives by understanding and responding to those complaints.

Finally, thanks are due to the officers of DERM for their significant assistance in the Code's implementation and evolution.

**Neil Lawson**

**Chair, Code Oversight Committee**

## Introduction

### Development of the Code of Conduct

A fundamental aspect of the Code is that it is a self-regulatory mechanism, whereby the industry is responsible for the day-to-day operation of the Code and its associated dispute and sanction mechanisms, as well as overall management of the Code. The role of Government is minimal, and in place primarily through its license agreements with the individual information brokers that electronically access the Queensland Valuation and Sales (QVAS) data.

Most importantly, Code membership is *mandatory* for a party seeking to access particular data. The QVAS data fields containing the names and service addresses of purchasers and vendors (QVAS Identified Information) are only accessible to approved Subscribers to the Code

The Licence agreements that are in place between information brokers and DERM make it a condition that brokers wishing to access name and address data must be subscribers to the Code.

The Code of Conduct, was established to address concerns about the use of personal identification information being sourced from databases maintained by the Department of Environment and Resource Management. Information from QVAS is made available under licence to approved information brokers who provide it to their clients.

The database contains the following information:

- details of the property, including the street address
- transaction details (e.g. purchase price and type of sale); and
- relevant details, i.e. names and service addresses of the vendors and purchasers.

QVAS data includes information about who owns property, the owner's service address, i.e. where formal correspondence may be sent, previous sale prices for the property and the dates of sale.

Community concerns arose about the inappropriate use of this data for direct marketing purposes. In response information brokers worked with the Queensland Government to develop the Code of Conduct as a means for the industry to self-regulate the use of the data.

Before an information broker will be licensed by DERM to have electronic access to the QVAS data, the broker must be approved as a Subscriber to the Code and thereby be committed to the requirements of the Code of Conduct. If a Code subscriber, or any of their customers, is found to be in breach of the Code they may lose their access to the data with the resulting impact on their commercial businesses.

The Code began operation on 1 October 2009. Its Subscribers include all the major information brokers operating within Australia.

## **Direct marketing**

A key objective for the Code was to prevent QVAS data from being used for unsolicited direct marketing by businesses who were clients of the information brokers licensed to access the data. Direct marketing includes, but is not limited to, telemarketing, bulk email messaging, postal mail outs and list brokering.

Names and addresses of persons are commercially available, as mailing lists, from sources other than the QVAS database. For example, in some instances local government makes its rate lists available or names and addresses are collected when members of the public enter competitions and complete entry forms with their personal contact details. In some instances letters are mailed to generic addressees such as “The Home Owner” or “The Property Owner” at specified street addresses.

The Code of Conduct does not apply to these examples of direct marketing unless the address for service is obtained from the QVAS database through a Code subscriber.

Some of the complaints received by the Code Oversight Committee have been about generic mail outs or distributed flyers which have not relied on QVAS data. In some other cases where the person received mail addressed to them by name at their property address, the details may have been obtained from sources such as neighbours, local councils, contact details acquired over time by local real estate agents, and lists compiled from personal contact details recorded at open inspections of properties for sale.

As a consequence, the Code cannot by itself prevent all unsolicited direct marketing but it can prevent the use of QVAS information sourced through those brokers who are Subscribers.

## **Access to QVAS Data**

Access to the information held in the QVAS database is available to individual businesses, industry professionals and members of the public and can be obtained over the counter for a fee from the Department of Environment and Resource Management (DERM). The information is generally accessed by potential purchasers and professionals acting in property transactions, for example, solicitors and valuers.

A number of information brokers have been granted access to bulk data from QVAS. This is in the form of a licence agreement obtained through DERM. A number of brokers' clients also access QVAS data through products distributed by the information brokers. These products include additional data added by the information brokers from other sources. These may include photos of the property or a map of the property location. In these instances, clients can include real estate agents, valuation agents, surveyors, financial institutions and members of the public.

## **Governance**

The Code Oversight Committee consists of three members: an independent Chair, a consumer representative and an industry representative. The role of the Committee includes the following

- approving and registering Valued Added Brokers as Code Subscribers;
- monitoring compliance with the Code by its Subscribers;
- overseeing complaints handling and, where necessary undertaking the investigation of complaints;
- determining sanctions on Subscribers to the Code for non compliance;
- maintaining the Register of Suppression Requests; and
- maintaining a Register of Excluded Parties.

The Committee has developed further guidelines, the Terms of Reference, which include the setting out of the jurisdictional limits of the Committee. The Committee is independent of government but does have reporting obligations including the following:

- prepare and publish an annual report;
- commission an independent review every three years commencing August 2012.

These obligations are detailed within the Terms of Reference and the Code of Conduct.

## **Code Oversight Committee Members**

### **Mr Neil Lawson**

#### *Independent Chair*

Neil Lawson is the independent chair of the Code Oversight Committee and is nominated by the Minister for Natural Resources.

Mr Lawson is a management consultant and ethics consultant and trainer in workplace and business conduct improvement. He is a past Commissioner for Consumer Affairs in Queensland and has held executive management positions in the private and public sectors including in government departments responsible for economic development and land administration.

## **Mr Kris Matthews**

### *Industry Representative*

Kris Matthews has over 15 years experience in the real estate and information technology industries.

Mr Matthews commenced with Micro Developments in May 1997 which was later acquired by RP Data in November 1999. In his current role he is responsible for overseeing Data Acquisition, Compliance, Governance and Operations across the RP Data Group.

## **Mrs Kristina Day**

### *Consumer Representative*

Kris Day has over twenty five years experience in the finance industry and more specifically in the consumer rights and complaints resolution sectors.

Mrs Day is active in the fields of developing and improving complaints management processes and procedures, including internal disputes resolution schemes, and consumer education.

## **Value Added Property Information Broker Association Incorporated**

### *Formation of the Association*

As a result of the formation of the Code of Conduct under the adoption as a self regulatory model fully funded by the Value Added Brokers, it became evident that an Association would need to be established to:

- Create a central body responsible for the budgeting and funding of the Code of Conduct
- Create a body from which education, administration and regulation can occur
- Provide a mechanism for Valuer Added Brokers to represent and promote this essential industry.

The Value Added Property Information Broker Association (VAPIBA) Incorporated was incorporated in New South Wales under the *Associations Incorporation Act 1984* (NSW) on 16 December 2009.

The Association was incorporated in NSW because, at the time of formation, there were only five brokers who were Code Subscribers and this number was not sufficient to meet the threshold number of seven required for incorporation of an association in Queensland.

All Code Subscribers are members of the Association and support it financially.

*Association officeholders*

President:	Yan De Horta, Veda Advantage
Vice President:	Tom White, Property Data Solutions
Treasurer/Secretary:	Kris Matthews, RP Data
Public Officer:	Grant Carter, Australian Property Monitor

*Association Members*

- RP Data Limited
- CITEC Confirm\*
- GlobalX Information Services Pty Limited
- Residex Pty Limited
- Veda Advantage Information Services and Solutions Limited
- Australian Property Monitors Pty Ltd
- onthehouse.com.au Pty Ltd
- Property Data Solutions
- Searchess Pty Ltd

*(\* CITEC Confirm is a business unit of the Queensland Government. It contributes financially on the same basis as other brokers to the Association and the Code but cannot hold formal membership of an incorporated association because of its status as a government entity.)*

**Industry perspective – Kris Matthews**

It has been pleasing to be involved in the inaugural year of not only the Code Oversight Committee but also the start up of the Value Added Property Information Broker Association.

The successful operational status of both of these achievements should be recognised as a substantial result given it has been formed from what is essentially a group of very competitive companies in one of the world's most challenging environments for businesses.

Key milestones have been:

- Successful approval from Government of a self regulation model as proposed by the industry



- Successful formation of the Code Oversight Committee with Industry working alongside government and consumer advocates.
- Successful start up funding to initiate and operationalise the Code Oversight committee and the industry association
- Formation of the Valued Added Property Information Broker Association
- The design and build of the Code of Conduct website

## **Consumer access**

### **Website**

The official Code of Conduct website is due for release on Wednesday 20 October 2010.

The website has been designed with the aim of being the central location for information for members of the public, government, real estate professionals and the Valued Added Broker Industry.

The website's URL is <http://www.propertydatacodeofconduct.com.au>.

The primary aim of the website is to assist and inform members of the public on:

- The nature of publicly available property information in Queensland
- The terms of use of property information in Queensland under the Code of Conduct
- Information on the Code, the Code Oversight Committee and its function and authority
- Value Added Information Brokers approved as Code Subscribers under the Code
- Ways in which any person who owns property within the state can submit a request for the suppression of their personal identification information on QVAS data as held by Value Added Brokers who are Code Subscribers.

The website has also been developed to assist also with transparency in the Code of Conduct's administration by providing access for approved entities to:

- a central, auditable receipt and approval mechanism of suppression requests;
- records on the compliance of Code Subscribers with suppression requests; and
- a Register of Excluded Parties, that is Code Subscriber customers / end users or other third parties who have been found in breach of the Code's prohibition on direct marketing and have had sanctions imposed on them.

## Suppression Requests

Consumers may apply to the relevant Code subscribers or alternatively, the Committee, to have their personal information suppressed and added to a Register of Request Suppressions. Subscribers must then suppress that information within their systems, and ensure personal details are not disclosed. The Committee will then notify all Code subscribers within four working days of receipt of a request for suppression. The personal information that can be suppressed is the name or names of the property owners and the address they have nominated for service (i.e. their service address).

Code subscribers are then required to action suppression requests within thirty days of receiving notification from the Committee. It is a requirement under the Code that subscribers must reasonably cooperate with all requests to suppress QVAS identified information.

In the period 1 October 2009 to 30 September 2010 the Committee received and actioned requests for the suppression of names and service addresses from 43 property owners with respect to 93 properties in Queensland.

It is anticipated that with the availability of the Code's website, which allows for requests for suppression to be made online, and with greater public awareness, the number of suppression requests will increase significantly in 2010/2011.

**The Committee can be contacted at [info@propertydatacodeofconduct.com.au](mailto:info@propertydatacodeofconduct.com.au)**

## Complaints

### Internal Dispute Resolution Frameworks

A *complaint* is the term given to communications from consumers when they express dissatisfaction with a subscriber's service. Under the Code, all subscribers are required to have a documented internal dispute resolution (IDR) framework in place in order to deal with consumer complaints.

Each subscriber is required to have an internal complaint process to deal with consumers' complaints. Consumers must try to resolve their complaint with the subscriber before the Committee can consider the matter. If consumers make contact with the Committee before using the subscriber's internal complaint process, then they will be referred to a nominated person in authority at the subscriber's office to give them the opportunity to resolve the matter.

The Code sets out that the Committee cannot consider the complaint until

- thirty days have elapsed since the consumer lodged the complaint with the subscriber's complaint resolution process, and the matter has not been resolved; or
- the consumer has notified the subscriber that its formal proposal to resolve the complaint is unacceptable, whichever is the earlier.

If a matter has been dealt with internally by the subscriber and the consumer remains dissatisfied or if they had brought their complaint to the attention of the subscriber but with no response or resolution after thirty days, the Committee will lodge the complaint as a dispute. This will take place if the complaint satisfies the provisions set out in the Code.

### **Acceptance by the Committee of a Dispute**

The Committee investigates unresolved disputes between consumers and Code subscribers and facilitates resolution of disputes

A dispute is a complaint which has been lodged with the Committee as a result of having not been satisfactorily resolved through the IDR process or if it is lodged after more than thirty days have elapsed since consumers reported their dissatisfaction to the subscriber.

Following receipt of an unresolved complaint, the Committee will make an initial assessment of whether it can deal with the dispute under the jurisdictional limitations and provisions of the Code. If it is not covered by the Code, the Committee will be unable to accept the dispute and no investigation will take place.

If, however, the dispute falls within the ambit of the Code, the Committee will consider the dispute and resolve it by mutual agreement. If a dispute cannot be resolved by mutual agreement the Committee will conduct a detailed investigation and will then make a decision.

If either the subscriber or the consumer is not satisfied with the outcome of the Committee's consideration of the matter, the Code then provides for the use of an independent arbiter. The cost of the arbitration is borne by the subscriber involved with no fee being charged to the consumer. The decision of the independent arbiter is binding on the subscriber.

### **Complaints outside the provisions of the Code**

The Committee has an absolute discretion to decide whether or not to consider a complaint. It may decline to consider a complaint where it falls outside the Committee's powers or authority as provided for by the Code.

Some of the types of complaints that the Committee may consider but decide not to act on, may include

- complaints that are more appropriately dealt with in another forum, provided that they do not involve a breach of the Code
- complaints that have not first been considered by the subscriber
- prior to the date of commencement of the Code, being 1 October 2009
- Settlement already reached with subscriber or the internal complaint process has not been satisfied

### **Complaints outside the Committee's time limits**

If the complaint relates to an event which took place more than 12 months before the date on which the consumer made the complaint to the subscriber in writing, the Committee cannot accept the dispute.

Nor can the Committee investigate a dispute if the event occurred before the subscriber became a subscriber to the Code. In circumstances where the complaint is between a consumer and an agent, the business of which has been acquired by a subscriber, and if that agent was not a agent of the subscriber at the time the events occurred, the Committee again is unable to consider the matter.

However, where a complaint relates to a series of events that commenced prior to the subscriber's date of membership and continued after this date, the Committee is able to consider the matter in its entirety (including those events that occurred prior to the membership).

### **Consequences for a Breach of the Code**

The consequences of a breach of the Code by either a Code subscriber or their agent can be very serious. The Code subscriber can lose access to personal identification information in the QVAS database and the Code subscriber's agent can lose access to the same data from their information broker. Both can be listed as 'Excluded Parties' under the Code and denied access to the QVAS personal identification information data. A Code subscriber Customer, such as a real estate agent, who is listed as an 'Excluded Party', cannot then obtain the data from any other Code subscriber.

It is the responsibility of the subscriber to establish binding agreements with its customers, agents or other third parties who gain access to the information prohibiting direct marketing.

### **Types of Complaints received in the Reporting Period**

As set out under the Code, complaints that are received by the Committee are initially referred to the Code subscriber who is believed to be linked to the matter being complained about. Most frequently this has been unsolicited direct mail received from a real estate agent.

In cases where the alleged conduct is by a real estate agent, for example, it is not always known from which Code subscriber the information may have been obtained. This necessitates consultation with all Code subscribers to identify which subscriber supplies data to the agent concerned. Fortunately in the first year of the Code's operation there have been relatively few complaints where the alleged source of the data has been difficult to determine.

### **Timeframes**

In the majority of cases complaints have been dealt with within the timeframes required by the Code. In one particular case a complaint proved more complex and required the development of improvements in the methodology for complaint handling and helped clarify some policy and procedural issues and has lead to improved investigation processes. At the time of publishing this report the final outcome of this complaint had not been determined (refer to Case Study 1).

### **Complaints received by the Committee**

Up to 30 September 2010 the Committee had received 11 complaints. In some instances individual complaints related to multiple properties.

The complaints included those from

- persons concerned about receiving generic flyers distributed in their letter boxes;
- persons concerned about elderly relatives receiving unwanted approaches from real estate agents;
- building unit managers concerned about direct marketing to the owners of properties in unit complexes managed by them; and
- persons who believed their personal details were being used for direct marketing.

The Committee regards all complaints as important. Complaints are crucial to the Committee achieving its objectives because it is through complaints that the Committee learns and understands what is needed.

The Committee's policy is to welcome complaints from anyone who can bring to the Committee's attention suspected breaches of the Code of Conduct. Complainants do not have to be individual property owners who are personally affected. The Committee wants to hear about all suspected breaches of the Code.

With the availability of the Committee's website and more information about the Code being available to the community, it is anticipated that the number of complaints will increase in 2010/2011.

### **Education of the real estate industry – Prohibition of direct marketing**

One of the priorities of the Committee in 2010/2011 will be to encourage greater awareness and understanding of the Code of Conduct amongst those in the real estate industry both at the company and individual agent level.

To achieve this, the Committee will work in collaboration with its Code Subscribers and the real estate industry to promote the Code and the compliance and enforcement activities of the Committee, particularly as they relate to prohibited direct marketing.

### **Serious or systemic breaches**

The Committee is required to report all systemic issues to DERM. A systemic issue is one where a dispute or several disputes has the capacity to affect a group of people in addition to those who have complained. A systemic issue may be identified either by receipt of several disputes of the same type or as the result of only one dispute where the effect of the particular issue in dispute will clearly extend beyond the immediate parties.

A serious or systemic breach of the Code can be found by the Committee following the investigation of a complaint. A determination that a serious or systemic breach has occurred is then provided to the Code subscriber in writing requiring a detailed response.

The following actions would be seen to constitute a serious or systemic breach of the Code:

- damage to the reputation of the industry
- the Code subscriber has engaged in repetitive or ongoing noncompliance
- the Code subscriber has ignored the Committee's request to remedy a breach or failed to do so within a reasonable time
- the Code subscriber has breached an undertaking given to the Committee.

Where the Committee has made a decision that there has been a breach by a Code subscriber, the Committee may impose any of the following sanctions but are not limited to:

- require the Code subscriber to undertake immediate remedial action including, but not limited to, changes to documentation or internal processes, and / or corrective advertising;
- require the Code subscriber to remove QVAS Identified Information from its data
- require the Code subscriber to remove specified Personal Information from its data
- require the Code subscriber to cease providing data and / or services to a Code subscriber's agent or other third party
- issue a warning to a Code subscriber regarding the potential impact of any further breaches on future sanctions.
- publication of the name of the Code subscriber and the nature of the serious or systemic breach in the annual code compliance report or in other publications
- suspension from membership of the Code for a period of between one and six months, at the discretion of the Committee, and/or
- permanent suspension from membership of the Code and listing on the Register of Excluded Parties.

In cases where the Committee has determined to impose a sanction that involves suspension from membership of the Code, the Committee will advise the DERM, so that it will then suspend provision of Personal Information under the subscriber's licence.

The Committee is responsible for the recording and maintenance of the Register of Excluded Parties. The Committee identifies possible systemic issues as early as possible, with most issues expected to be identified when new complaints are received. All possible systemic issues are referred by the Committee to the relevant subscriber for a response. Relevant information will be requested to assist in determining whether a systemic problem does in fact exist.

There were no serious or systemic breaches of the Code identified in the 12 month period 1 October 2009 to 30 September 2010.

At the time of publication of this Annual Report, the Committee had received and was considering an investigation report concerning allegations of two instances of alleged direct marketing by two separate real estate companies.

## **Case studies**

### **Case Study 1**

The case involved the alleged action by a real estate firm who sent letters offering their services to the owners of units in an apartment complex in the Brisbane metropolitan area. In several instances the letters went to persons who owned the units but did not live there. The letters were sent to the property owners' service addresses rather than their unit address in the complex. Some of the property owners lived outside south east Queensland.

A complaint was made to the Code Oversight Committee and then passed to the Code Subscriber believed to be the information broker who had the real estate agent as a customer.

In the first instance, in response to inquiries made by the Code Subscriber to the agent, it appeared that there was a plausible explanation that the names and addresses had come from a source other than QVAS and also the agent denied any wrongdoing. However further information came to light which raised doubt and made it clear that a more rigorous investigation methodology was required.

As a consequence, the Code Subscriber engaged a consultant investigator to research the available evidence, interview witnesses, obtain witness statements, and prepare a report for the consideration of the Code Subscriber and the Code Oversight Committee.

In considering complaints and investigation reports the Code Oversight Committee is the decision maker responsible for considering all the evidence adduced. It has the responsibility of making decisions which may result in sanctions being imposed on a Code Subscriber and or their customers. The standard of proof under the Code is the same as the civil law standard that is, what is considered more likely to have occurred on the balance of probabilities.

The Committee received the investigation report just prior to publishing this Annual Report. Based on the evidence gathered during the investigation, and the degree to which the allegations may be found to have been substantiated, the Committee will determine what, if any action, including possible sanctions, should be applied.

### **Case Study 2**

The directors of a company contacted the Committee and requested that the name of its company and the addresses of its offices be suppressed in the databases of information brokers covered by the Code. They were engaged in a dispute and potential litigation with another company.

The directors were informed that the Code does not cover corporations, businesses or any other legal entity apart from a natural person. Under the Code a ‘Consumer’ is defined as ‘an individual whose Personal Information appears in any field in the QVAS Database.’

### Case study 3

A person who was about to settle on the purchase of an investment property wrote to the Committee and asked for all information about herself and the property, including how much she paid for it, to be suppressed in brokers’ databases.

The person was advised that under the Code her name and the service address (e.g. her home address or a PO Box) could be suppressed for the investment property. However she was also advised that the Code can only suppress information that identified her and her service address – it could not suppress the address of the property itself nor the transaction details, including the sale price. It was explained that information about the location of properties and when they were sold and for how much is important information in support of a well informed marketplace for persons buying or selling real estate.

## Financial report

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### As at 30 September 2010

Code Subscriber Contributions	54,000.00
Oversight Committee Fees – Chairman Neil Lawson	(13,835.17)
Oversight Committee Fees – Consumer Representative Kris Day	(13,245.55)
Website Development Fees	(25,000.00)
	1,919.28

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Contact details:

The Code Oversight Committee:

info@propertydatacodeofconduct.com.au

PO Box 828, Kenmore, Qld 4069

Valued Added Property Information Brokers Association Incorporated:

Kris Matthews

Secretary – Value Added Property Information Brokers Association Inc.

kris.matthews@rpdata.com

Locked Bag 5, Eagle Farm QLD 4009

**APPENDIX A - Approved Code Subscribers**

**As at 30 June 2010:**

- RP Data Limited  
6 Eagleview Place,  
Eagle Farm, Qld 4009
- CITEC Confirm  
Level 3, 192 Ann St  
Brisbane Qld 4000
- GlobalX Information Services Pty Limited  
GPO Box 2746  
Brisbane, Qld 4001
- Residex Pty Limited  
6/21 Walker Street  
North Sydney NSW 2060
- Veda Advantage Information Services  
and Solutions Limited  
Level 15, 100 Arthur Street  
North Sydney NSW 2060
- Australian Property Monitors Pty Ltd  
Level 1, Darling Island Road,  
Pyrmont NSW 2009
- Property Data Solutions  
92 Petrie Tce,  
Brisbane, Qld 4000
- Searchess Pty Ltd

Lvl 9, 333 Adelaide S

Brisbane, Qld 4000

**As from 1 July 2010 the approved Code Subscribers also included:**

- onthefhouse.com.au Pty Ltd

4/55 McDougall Street

Milton Qld 4064

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