

## Privacy Policy

This privacy policy sets out how **Homesta Pty Ltd** ACN 648 316 821 (“we”) treat the privacy of customers, users of our online services, website and applications (collectively the “**Platform**”), and others with whom we interact.

In this privacy policy, the term “**personal information**” has the meaning ascribed under the *Privacy Act (1988)(Cth)* and includes information about an identifiable individual, including their name, business, home and property addresses, telephone numbers, email addresses, date of birth, photographs depicting the individual, profile information, electronic signatures, drivers’ licence details, information about occupation and professional qualifications, credit card details, information about properties owned by the individual and employment details.

We respect the privacy rights of individuals. This policy details how we collect, store and use personal information.

### 1. Collection and Storage of Personal Information and Data

We may collect personal information about individuals. Our usual approach is to collect personal information directly from the individual concerned. This information could any of the types of information referred to above. In most circumstances we do not collect sensitive information.

For example, we collect personal information in circumstances including:

- (i) when you sign up to become a user of the Platform;
- (ii) when goods or services are ordered through the Platform;
- (iii) when you telephone us or visit our Platform and make an enquiry to which a later response is requested and to do so requires your contact details;
- (iii) when you list a property for sale, where that property is held in your own name and/or for another person (in which case we may collect details of that other person);
- (iv) when you ask to be included on marketing distribution lists or interact with our social media services;
- (v) when you enter a competition or special promotion;
- (vi) when you (including on behalf of a company or your employer) enter into an agreement with us; and
- (vii) when receiving applications for employment, when evaluating job applicants and personnel which may include collection of details such as employment history and educational qualifications.

We may use ‘cookies’ to collect data (typically not personal information) relating to your general internet usage. This data may include IP-addresses, browser versions, number of visits and similar such data relating to your navigation of the internet and our site. A cookie is a small text file that is placed on your computer’s hard drive. Cookies help us to improve our site and to deliver a better and more tailored service, for instance by storing information about your preferences and allowing us to recognise you when you return to our site.

You may refuse to accept cookies by activating settings on your internet browser. However, please note that if you select such settings you may be unable to access certain parts of our website.

Our customers may also potentially contact you through third party real estate websites, enquiring about a property you have for sale.

We hold personal information in our own secure databases, and, to some extent, for marketing purposes in the database of Plezzel Pty Ltd, our marketing consultancy partner (subject to obligations regarding privacy and confidentiality) and PropTech Group Limited (CRM agency) to conduct electronic direct marketing subject to all legislative requirements.

## 2. Use and disclosure of Personal Information

We may use personal information for the purpose of marketing but only where such use complies with the applicable privacy laws.

We use the personal information collected from you for the purpose it was provided or collected, including in the following ways:

- (a) For the purposes of collection described in (1) above;
- (b) To respond to enquiries received from you;
- (c) To process, confirm, fulfil and update you about your orders and to carry out our obligations arising from any contracts entered into between you and us, and/or, where applicable, orders between you and third party providers where you procure their goods or services through use of the Platform;
- (d) To perform authorised financial transactions with you;
- (e) To verify your identity and to assist you if you have forgotten any user name or password;
- (f) To communicate with you and provide you with information (whether by email, post or other means) about our products and services or our Platform, where you have requested or consented to receiving this from us or where this provision is otherwise permitted at law;
- (g) To notify you about changes to our goods, services and Platform;
- (h) To allow you to participate in interactive features of our Platform, when you choose to do so;
- (i) To tailor specific product offerings to you;
- (j) To enable you to enter competitions we run;
- (k) To facilitate your participation in surveys we (or a third party on our behalf) runs where you volunteer that personal information;
- (l) To interact with you through social media platforms (such as Facebook, Twitter, Instagram), if you elect to use such platforms, subject to the platform's privacy policy;
- (m) To receive and address and possibly publicise complaints, feedback or testimonials from you;
- (n) To monitor, for safety and security reasons, interactions between users of the Platform taking place over the Platform;
- (o) To protect our legal interests and fulfil our regulatory obligations (if and to the extent necessary); and
- (p) in other circumstances, with your prior consent.

We may use personal information for the purposes of marketing to users but only where such use complies with applicable legislation.

All customers and others with whom we interact have the option to opt-out of receiving marketing communications from us. If you do not wish to continue to receive electronic marketing communications from us and/or selected third parties you should opt-out by clicking on the "unsubscribe" link in any email communications that we might send you.

We may also provide personal information to third parties outside our group companies for limited purposes, such as to help us in providing goods and services to customers.

Those persons and business may include:

- (a) Organisations who carry out credit, fraud and other security checks;
- (b) Our online payment gateway service providers (eg Paypal/ Stripe), for the purpose of facilitating payments;
- (c) Couriers and delivery businesses (where we arrange to deliver goods to you or persons you have requested us to send deliveries to);
- (d) Third party software providers who store details of customer accounts for us or who provide other IT services; and
- (e) Third party providers of goods or services, where you have used our Platform to engage with them.

We may also disclose your personal information to third parties outside our group of companies:

- (a) Where we have your express permission to do so;
- (b) Where it can reasonably be inferred from the circumstances that you consent to the disclosure to the third parties;
- (c) If all of our assets are acquired by a third party, in which case personal information which we hold about our customers may be one of the transferred assets (subject to the same constraints on use and disclosure as under this policy); and
- (d) If we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions or to protect the rights, property, or safety of our company or its personnel or customers . This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We limit the information we provide to third parties to the information they need to help us provide or facilitate the provision of goods and services to you. We deal with third parties that are required to meet the privacy standards required by law [] in handling your personal information, and use your personal information only for the purposes that we gave it to them.

We will not provide your personal information to real estate agents, unless they have entered into an agreement with us and where they agree to protect that personal information.

### **3. Security of personal information**

We take all reasonable steps to protect your personal information, including internal and external security, restricting access to personal information to those who have a need to know, maintain technological products to prevent unauthorised computer access and regularly reviewing our technology to maintain security.

We treat website and credit card security seriously and endeavour to provide a secure, safe platform through which to conduct transactions.

We store personal information using Amazon Web Services located in Sydney.

### **4. Disclosure and transfer of information overseas**

We may transfer some personal information overseas to a company located in the Philippines that provides services to us in connection with our databases. They will be able to view and edit customer details, subject to rigorous monitoring from us. We have an agreement with that company that requires them to treat personal information of our customers in accordance with applicable laws, including the Privacy Act.

**5. Questions and concerns and access to/ correction or updating of your personal information**

You have a right to access the personal information we hold about you. To obtain a copy of the personal information we hold about you, please write to us at:

Mr Andrew Ranger  
CEO  
Homesta  
aranger@homesta.com.au

Please provide sufficient detail about the information in question to help us locate it. We will then use commercially reasonable efforts to promptly determine if there is a problem and take the necessary corrective action within a reasonable time.

**6. Changes to our privacy policy**

We may modify, alter or otherwise update this privacy policy at any time. We will post revisions on our website. We encourage you to review this policy from time to time.

**Last update: February 2022**