

Eiddo Privacy Policy

Last Modified: 2 May 2017.

1. Privacy Statement

Eiddo Pty Ltd ACN 611 257 973 (**we, us, our**) consider your privacy and that of your prospective buyers to be important. We take our responsibility to protect it seriously. We understand that you are concerned about privacy, along with the confidentiality and security of any personal information that you provide to us.

This Privacy Policy (**Policy**) sets out how we collect, hold, use and disclose information about individuals who deal or interact with us. We treat all personal information collected by us in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**), the Australian Privacy Principles contained within the Privacy Act and this Policy.

If there is any inconsistency between the Privacy Act and this Policy, the Privacy Act will prevail to the extent of that inconsistency.

2. Personal information

Personal information is information or an opinion of an individual whose identity is apparent or can be reasonably ascertained. We collect a wide variety of personal information that is reasonably necessary for the purposes of conducting and improving our business and our services. This information is collected from a range of sources including:

- (a) through our website www.eiddo.com.au or app.eiddo.com.au (the **Site**);
- (b) through our account creation process;
- (c) directly from our users inputs into the Site;
- (d) through marketing research;
- (e) from conducting business or intending to conduct business with us, whether past, present or future;
- (f) via surveys;
- (g) by otherwise having some form of contact with us such as such as by mail, telephone, email, internet or intranet; and/or
- (h) through any of our other business activities or events.

Personal information collected by us may include:

- (a) your name;
- (b) the organization that you represent and your position in it;
- (c) your gender;
- (d) your date of birth;
- (e) your address;

- (f) your occupation;
- (g) your bank account details;
- (h) your contact details such as your mobile number, telephone number and email address;
- (i) your reasons for using our services;
- (j) your preferences and opinions;
- (k) all of the above listed personal information relating to your potential buyers; and
- (l) all logs, which may include information such as your internet protocol (IP) address, browser type, browser version, clickstream data, referring URLs, the pages of our Site that you visit, the time spent on any pages of our Site and other log related information relating to your use of our Site.

We endeavour to only collect personal information about you and your potential buyers where it is reasonably required.

3. Use of personal information

We automatically gather information to monitor the use of our Site. Much of the data we collect is aggregated, and this information is effectively anonymous to us.

Sometimes you will be asked to confirm that you agree to a particular activity, or the collection of personal information for a specific purpose. We will make it clear to you if any information is being collected in a way that could personally identify you.

In general we use personal information for providing, evaluating, improving, personalising and developing our business our Site and our services. More specifically we use personal information for:

- (a) improving user satisfaction;
- (b) providing support to you;
- (c) the purpose of informing an interested party to the sale of a property enabling the transaction to progress;
- (d) promoting and marketing our Site to you (each person may opt-out of marketing and sales communications);
- (e) determining whether an individual is suitable for a position within our business, as an employee or contractor for a current or future project;
- (f) our internal research and statistical purposes (including market segmentation, market analysis and trend identification); and
- (g) enabling us to forward to you other information or material which we believe may be of interest to you (each person may opt-out of our information sharing communications).

4. Disclosure of personal information

4.1 Disclosure generally

We do not disclose personal information to any third party without consent, except where that third party requires the information to assist us in an advisory, technical or services context.

Aside from the above, we will only disclose personal information as legally required – either upon valid court order, as required under the Privacy Act, or where compelled by a law enforcement or governmental agency.

4.2 Information you make public

Certain information you provide is open to other account holders to view. Any information you create or post in these locations will not be private.

We urge you to exercise caution when deciding to disclose your personal information or that of your potential buyers in a public space. You agree to assume all responsibility for all personal information that you have made public.

Users will be notified as soon as reasonably possible, where allowable by law, if any request for the disclosure of their personal information or that of their potential buyers is made by a third party.

5. Protecting personal information

5.1 Steps we take

We take reasonable steps to protect personal information we hold from:

- (a) misuse, interference and loss; and
- (b) unauthorised access, modification or disclosure.

The precautionary steps we take to protect personal information include:

- (a) adopting measures to protect our computer systems and networks for storing, processing and transmitting personal information;
- (b) adoption of procedural and personnel measures for limiting access to personal information by our staff;
- (c) regularly reviewing our information collection, storage and processing practices; and
- (d) such other security measures we consider reasonable and appropriate from time to time.

Notwithstanding that we use our best endeavours to protect all personal information we collect and hold, we unfortunately cannot guarantee its complete security.

5.2 De-identifying personal information

When personal information is no longer required to be kept by us, we will take reasonable steps to destroy or delete the personal information in a confidential manner.

6. Cookies

Cookies are files with small amounts of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your computer's hard drive.

We use "cookies" to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some features of our products and services.

7. Overseas disclosure

7.1 No overseas disclosure

We store all personal information that we collect on servers located in Australia. Subject to clause 7.3, we will not disclose or transmit any personal information overseas.

7.2 Disclosure for analytics

We may use Google Analytics to track your usage of our website. Google Analytics is a web analysis service provided by Google. Google utilises the data collected to track and examine the use of the website, to prepare reports on the site's activities and share them with other Google services.

Google may use the data collected to contextualise and personalise the ads of its own advertising network. Personal data collected by Google includes cookie and usage data, which is processed in the USA. You can find Google's privacy policy here: <http://www.google.com.au/policies/privacy/>.

7.3 Consent to overseas disclosure

We will only disclose personal information to an overseas recipient if:

- (a) you consent to the transfer; or
- (b) the disclosure of the information is required or authorised by or under an Australian law, other applicable law or a court/tribunal order.

We will take reasonable steps to ensure such overseas recipients do not breach the APP's and are subject to laws or a scheme substantially similar to the APP's.

8. Third parties

Our website and products may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the privacy policy of every site you visit.

We have no control over, and assume no responsibility for, the content, privacy policies, or practices of any third party sites or services whatsoever.

You should be aware that your ability to opt-out of a third party tool or platform will depend on the conditions governing your agreement with that third party.

9. Accessing and updating personal information

9.1 Access to Personal Information

We will provide you with access to personal information held by us unless:

- (a) giving access would be unlawful; or
- (b) denying access is required under the Privacy Act or any other applicable law.

9.2 Request for Access

If you would like access to personal information aside from your account information or inputted potential buyer information, you must contact us in writing making such a request. Following receipt of your request, we will contact you and either provide you with the information you have sought, or an explanation detailing why we will not provide you with the information.

9.3 Amending personal information

We endeavour to keep all personal information we hold accurate, up to date and complete. If at any time you wish to correct any of your personal information or the personal information of any of your potential buyers you may be able to do so via the site.

If you wish to amend personal information that we hold that is not editable, please contact us to request amendment. If we elect not to correct your information, we will notify you, within a reasonable time, detailing the reason for our refusal, the mechanisms available for you to complain about our refusal and such other matters required by the Privacy Act.

If you wish to have your non-editable personal information deleted, please let us know and we will take all reasonable steps to delete it, unless we need to keep it for legal reasons.

10. International users

If you are located outside Australia and choose to provide personal information to us, that personal information will be transferred to Australia and processed in accordance with this Policy.

11. Complaints

We strive to ensure strict compliance with this Policy and to regularly review our practices against it.

If at any time you have a complaint against us regarding our Policy, including a breach of the Privacy Act, we invite you to make a complaint. All complaints made will be dealt with in confidence. We endeavour to respond within 30 days of receipt of a complaint with a resolution or proposed resolution to the issue raised.

Please note that you may also make a complaint to the Office of the Australian Information Commissioner about the handling of personal information. Information on making a privacy complaint can be found on their website at <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>.

12. Variations

We reserve the right to vary this Policy from time to time without further notice to you. Any variations made will be updated on our website. We will not reduce your rights under this Policy without providing you with notice.

It is your responsibility to check our Policy every now and again to ensure you are aware of any changes made to it.

13. Contact us

You may contact us by emailing admin@eiddo.com.au.