



PRIVACY POLICY

1) Your Rights

Proppay Pty Limited (ACN 636 448 265), its subsidiaries and related entities (Proppay, us or we) understand the importance of protecting the privacy of your personal information (Information).

This Privacy Policy sets out:

- a) how we protect the privacy of your Information,
- b) your rights in relation to your Information managed by us, and
- c) the way we collect, store, use and disclose your Information, including your financial and credit Information.

In handling your Information, we undertake to comply with the Privacy Act 1988 (Cth) (Act) and with the 13 Australian Privacy Principles set out in the Act.

This Privacy Policy will be updated when required.

2) What Information do we collect?

Information is defined as “information or an opinion about an identified or reasonably identifiable individual”.

In dealing with you, we may collect the following and other Information provided by you.

- a) information that identifies you including your name, address, telephone number, email address, date of birth, and drivers’ licence, passport and Medicare numbers;
- b) information about your assets and liabilities, employment and income, bank account details and statements, including balances and activity, payment and transaction history, and income tax returns;
- c) information regarding your credit status and credit history, including:
 1. information that identifies you;
 2. consumer credit information including information about institutions that have lent you money and with which you have accounts, including the dates on which the accounts are opened and/or closed, their limits, and their terms and conditions and any changes thereto;

3. whether you have or have not met any of your repayment obligations;
 4. details of whether you have defaulted on a payment and whether you have then made good on any previous default;
 5. information about any court proceedings regarding credit provided to you or for which you have applied;
 6. whether another entity has sought credit-related Information about you from a credit agency;
 7. information about the types and amounts of credit you have sought from a credit provider; and
 8. publicly available information relating to your credit worthiness including whether you have been insolvent or committed a serious credit infringement; and
- d) information about any investment property or properties you own or have owned, including lease, rental history, property management, and insurance information; and
 - e) details about your employment status.

3) How do we collect your Information?

We collect your Information directly from you when you complete an application form and/or through interactions in person or exchanges by telephone, facsimile, email, post or through our website.

We may also collect your Information from other sources including:

- a) your accountant or financial advisor;
- b) your property manager or managing agent;
- c) your employer;
- d) an application form completed by another person authorised by you to complete the application form on your behalf;
- e) a credit agency or bureau;
- f) credit providers;
- g) an information services provider; or

- h) publicly available sources of information such as your social media accounts.

We will only collect your Information from other sources if it is unreasonable or impracticable to collect the Information from you.

4) Why do we need your Information?

We collect, hold, use and disclose your Information where it is reasonably necessary:

- a) to conduct due diligence on you as a prospective customer of Proppay and as part of entering into any contractual arrangements;
- b) to provide you with our products and services;
- c) for accounting, billing and various internal administrative purposes;
- d) to inform you of our other products and services; and
- e) to comply with any legal or statutory requirement.

We may also use your Information for related purposes and in circumstance where it would be reasonable to expect us to use your Information. We may also use your Information in other situations with your consent or in accordance with the law.

Where your Information is used or disclosed, we will take reasonable steps to ensure it is relevant to the purpose for which it is to be used or disclosed.

You are, of course, under no obligation to provide us with your Information. However, without your Information, we will not be able to provide you with our products and services.

5) What do we do with your Information?

We will normally only use your Information for a purpose set out at paragraph 4 above. This may include disclosing your Information to:

- a) third parties performing administrative or other business management functions on our behalf;
- b) potential financiers and investors considering financing or investing in Proppay's business or assets, including lenders, credit providers and a credit reporting body;
- c) Our professional advisors, contractors, insurers, accountants and consultants;
- d) government and regulatory bodies and agencies; and
- e) any person you have authorised us to disclose your Information to.

Our disclosure of your Information to third parties is on a confidential basis or otherwise in accordance with the law. We may also disclose your Information with your consent or if disclosure is required or authorised by the law.

6) Disclosure to overseas recipients

We may disclose your Information to overseas recipients including investors and financiers in order to provide our services and products.

Overseas recipients may have different privacy

and data protection standards to Australia. Before disclosing your Information to an overseas recipient, we will take reasonable steps to ensure the overseas recipient complies with Australian Privacy Principles or is bound by a substantially similar privacy regime unless you otherwise consent to the disclosure or it is otherwise required or permitted by law.

If you have any queries or objections to such disclosures or would like to be advised of the locations of such overseas disclosures, please contact Proppay's Privacy Officer.

7) Direct marketing

Proppay may use and disclose your Information in order to inform you of products and services (ours and third parties) that may be of interest to you. If you do not want to receive such information, please advise us.

8) The security of your Information

We take reasonable steps to ensure that your Information is protected from misuse, interference and loss and from unauthorised access, modification or disclosure. We hold Information in both hard copy and electronic forms in secure databases on secure premises, accessible only by authorised staff and Proppay shreds unwanted hard copy documents.

Proppay will destroy or de-identify Information in circumstances where it is no longer required, unless Proppay is otherwise required or authorised by law to retain your Information.

9) Accessing and correcting your Information?

We take reasonable steps to ensure the Information we hold is accurate, up-to-date, complete, relevant and not misleading.

You may access to and seek to correct your Information held by Proppay. If at any time you would like to access or correct your Information or would like more information on Proppay's approach to privacy, please contact Proppay's Privacy Officer.

Proppay will grant access to your Information as required or authorised by the Act or other law and will take reasonable steps to correct Information where necessary and appropriate.

To obtain access to your Information:

- a) you will have to provide proof of your identity; and
- b) be specific about the information you require.

We will respond to your request within 30 days from the date of your request.

We will also take reasonable steps to provide you with access in a manner that meets your needs and the needs of Proppay.

If we refuse your request to access or correct your Information, we will provide you with written reasons for our refusal.

If you are dissatisfied with our refusal to grant access to or correct your Information you may complain to the Office of the Australian Information Commissioner.

We may charge you a reasonable fee reflecting Proppay's cost for providing you access to or correcting your Information.

10) Online monitoring

We use 'cookies' on our website which are used for technical and statistical purposes only. The information collected is not Information and to the extent any Information is collected it is de-identified prior to being analysed for technical and statistical purposes. Cookies are a feature of your Internet browser that you can disable at any time.

We may also use external service providers to track traffic and usage of our website (Australian users only). We may use this information to help better inform our marketing and online advertising.

11) Electronic authorisation / communication

We may send you notices and other documents by email, text or through the customer log-in on our web site (Communication).

We will make all documents related to our services and products available for a reasonable period of time in the customers log-in area of our website, or we will send you such documents by email or other form of Communication.

If the information is displayed in the customer log-in area, we will send you an email or other form of Communication to the email address provided by you notifying you that information is available for retrieval from our website and notify you of the nature of that information.

As a user of our services, you must regularly check your nominated email inbox for notices.

12) How to contact us

For further information or enquiries regarding your Information, or if you would like to opt-out of receiving any promotional or marketing communications, please contact Proppay's Privacy Officer at privacy@proppay.com.au.

13) Privacy complaints

All privacy complaints should be directed to Proppay's Privacy Officer. All privacy complaints will be:

- a) dealt with promptly and confidentially;
- b) treated seriously and respectfully; and
- c) treated in a manner so as to not affect your existing obligations or commercial arrangements with us.

Proppay's Privacy Officer will commence an investigation into your complaint and respond within 30 days. You will be informed of the outcome of your complaint following completion of the investigation. In the event that you are dissatisfied with the outcome of your complaint, you may refer the complaint to the Office of the Australian Information Commissioner.