

# PRIVACY POLICY

Abodey Pty Ltd's (ACN 651 081 177) ("we", "us" or "our") Privacy Policy sets out how we collect, use, store, share and disclose your personal information.

#### 1. OPENNESS AND TRANSPARENCY

- 1.1 We are committed to protecting your privacy, and respecting and upholding your rights under the Australian Privacy Principles (**APPs**) contained in the Privacy Act 1988 (Cth) (**Privacy Act**). We ensure that we will take all necessary and reasonable steps to comply with the APPs and to deal with inquiries or complaints from individuals about compliance with the APPs.
- 1.2 By accessing and using our website, products and services or listening to our podcast, you agree to and consent to the collection, use, storage and disclosure of personal information by us as set out in this Privacy Policy.

### 2. PERSONAL INFORMATION

- 2.1 Personal Information is information or an opinion about an individual whose identity is apparent, or can be reasonably ascertained, from that information or opinion (whether true or not, and whether recorded in a material form or not) ("Personal Information").
- 2.2 The type of Personal Information we collect from you includes, without limitation, the following:
  - (a) your full name;
  - (b) email address;
  - (c) telephone number(s);
  - (d) your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;
  - (e) details of the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries;
  - (f) any additional information relating to you that you provide to us directly through our website or indirectly through your use of our website or online presence or through other websites or accounts from which you permit us to collect information;
  - (g) information you provide to us through customer surveys; or
  - (h) any other Personal Information that may be required in order to facilitate your dealings with us.

## 3. COLLECTION

- 3.1 We will collect Personal Information only by lawful and fair means and not in an unreasonably intrusive way. Generally, we will collect Personal Information directly from you, and only to the extent necessary to provide our products and services requested, and to carry out our administrative functions or as required by law. We will not collect sensitive information from you.
- 3.2 We may also collect person information from you when you:
  - (a) fill in an application form;
  - (b) register for an account on our website;



- (c) use our services;
- (d) communicate with us;
- (e) visit our website;
- (f) listen to our podcast;
- (g) provide us with feedback; and/or
- (h) complete online surveys.
- 3.3 If you use a pseudonym when dealing with us or you do not provide identifiable information to us, we may not be able to provide you with any or all of our services as requested. If you wish to remain anonymous when you use our website do not sign into it or provide any information that might identify you.
- 3.4 We require individuals to provide accurate, up-to-date and complete Personal Information at the time it is collected.

## 4. WHAT DO WE DO WITH YOUR PERSONAL INFORMATION?

- 4.1 We use and disclose your Personal Information for the purposes for which the information is collected, or for a directly related purpose, including (but not limited to):
  - (a) providing our website, products and services to you;
  - (b) administering, protecting, improving or optimising our website, products and services (including performing data analytics, conducting research and for advertising and marketing purposes);
  - (c) informing you about our website, products, services, rewards, surveys, contests, or other promotional activities or events sponsored or managed by us or our business partners;
  - (d) responding to any inquiries or comments that you submit to us;
  - (e) verifying your identity;
  - (f) any other purpose you have consented to; and
  - (g) any use which is required or authorised by law.

# 5. DISCLOSURE OF PERSONAL INFORMATION

- 5.1 We may disclose your Personal Information to:
  - (a) third-parties we ordinarily engage from time to time to perform functions on our behalf for the above purposes;
  - (b) any person or entity to whom you have consented to us disclosing your Personal Information to;
  - (c) our external business advisors, auditors, lawyers, insurers and financiers; and
  - (d) any person or entity to whom we are required or authorised to disclose your Personal Information to in accordance with the law.

## 6. ACCESS AND MANAGEMENT

6.1 Subject to some exceptions provided by law, you may request access to your Personal Information in our customer account database, or seek correction of it, by contacting us. See



- section 11: Contact information. Should we decline you access to your Personal Information, we will provide a written explanation setting out our reasons for doing so.
- 6.2 We may charge a reasonable fee that is not excessive to cover the charges of retrieving your Personal Information from our customer account database. We will not charge you for making the request.
- 6.3 If you believe that we hold Personal Information about you that is not accurate, complete or upto-date then you may request that your Personal Information be amended. We will respond to your request to correct your Personal Information within a reasonable timeframe and you will not be charged a fee for correcting your Personal Information.
- 6.4 If we no longer need your Personal Information for any of the purposes set out in this Privacy Policy, or as otherwise required by law, we will take such steps as are reasonable in the circumstances to destroy your Personal Information or to de-identify it.

### 7. DIRECT MARKETING

- 7.1 Where we have your express or implied consent, or where we are otherwise permitted by law, we may use your Personal Information to send you information about products and services we believe are suited to you and your interests or we may invite you to attend special events.
- 7.2 At any time you may opt out of receiving direct marketing communications from us. Unless you opt out, your consent to receive direct marketing communications from us and to the handling of your Personal Information as detailed above, will continue. You can opt out by following the unsubscribe instructions included in the relevant marketing communication, or by contacting us in writing at <a href="info@abodey.com.au">info@abodey.com.au</a>.

## 8. CROSS-BORDER DISCLOSURE

- 8.1 We may disclose your Personal Information to third party recipients located in or outside of Australia in order to provide our website, products and services to you. As at the date of this Privacy Policy, such third-party recipients are located in Australia only ("Recipients").
- 8.2 When entering into a transaction with us you consent to your Personal Information being disclosed or transferred to such Recipients and you acknowledge and agree that we have no obligation to take such steps as are reasonable in the circumstances to ensure that the information that is transferred or disclosed to the Recipients will be treated in a manner that is consistent with the APPs. You also agree that insofar as the law allows, we have no liability to you or anyone else for any breach by the Recipient of the APPs.

## 9. ABODEY WEBSITE

- 9.1 When transmitting Personal Information from your computer to the Abodey website, you must keep in mind that the transmission of information over the internet is not always completely secure or error-free. Other than liability that cannot lawfully be excluded, we will not be liable in any way in relation to any breach of security or any unintended loss or disclosure of that information.
- 9.2 The Abodey website may use 'cookies' or other similar tracking technologies on our website that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser but if you do so, you may not be able to fully experience the interactive features of the Abodey website.

#### 10. SECURITY

10.1 We may hold your Personal Information in either electronic or hard copy. We take reasonable steps to protect your Personal Information from misuse, interference and loss, as well as



- unauthorised access, modification or disclosure and we use a number of physical, administrative, personnel and technical measures to protect your Personal Information.
- 10.2 However, we cannot guarantee the security of any Personal Information transmitted over the internet and therefore you disclose information to us at your own risk. We will not be liable for any unauthorised access, modification or disclosure, or misuse of your Personal Information.

### 11. CONTACT INFORMATION

11.1 If you require further information regarding our Privacy Policy or wish to make a privacy complaint, please contact us at <a href="mailto:info@abodey.com.au">info@abodey.com.au</a>.

## 12. MISCELLANEOUS

12.1 We reserve the right to modify this Privacy Policy in whole or in part from time to time without notice and amendments will be effective immediately upon posting of the amended Privacy Policy on the Abodey website.

### 13. DISCLAIMER

- 13.1 The information contained on our website and discussed on our podcast is general information only. It does not constitute professional advice. You should not use or rely on the information on our website and/or our podcast without obtaining professional advice.
- 13.2 Abodey is not a financial adviser. You should consider seeking independent legal, financial, taxation or other advice to determine whether any of the information, services or products discussed on our podcast or accessed via our website are suitable for you.
- 13.3 You acknowledge that it is your responsibility to consult with any relevant professionals and/or providers prior to using or relying on any information accessed via our website or through our podcast to determine whether the use of such information and any associated services or products is appropriate for you.
- 13.4 You understand that there are certain inherent risks when buying a property, selling a property or entering into a lease for a property. By using any information, products or services associated with the website and/or the podcast, you acknowledge and agree on behalf of yourself, your heirs and/or personal representatives that you are aware of these risks.
- 13.5 Abodey will not be liable for any loss caused, whether due to negligence or otherwise arising from the use of, or reliance on, the information provided directly or indirectly by use of our website and/or podcast.

Dated: 27th of October 2023