

# Privacy policy

Effective Date: September 10, 2015 Version 1.0

Please Read Carefully

This is the privacy policy ("Privacy Policy"), effective as of September 10, 2015, for the Web site available at <http://www.home789.com.au> (the "Site") made available by HOME789 (ABN 26 143 306 254) the legal owner of the Site and its affiliated companies ("HOME789", "we", "us" or "our"). This Privacy Policy sets forth our policies regarding the collection, use and disclosure of certain information relating to your use of the Site. Your use of this Site signifies your understanding and acceptance of the terms of this Privacy Policy.

This Privacy Policy is incorporated into, and part of, the Terms and Conditions located at <https://www.home789.com/Disclaimer.aspx>, which govern your use of the Site in general.

We recognize the importance of protecting your privacy and our Privacy Policy is designed to assist you in understanding how we collect, use and safeguard the personal information you provide to us, and to assist you in making informed decisions when using the Site.

This document is our privacy policy and it tells you how we collect and manage the personal information of the parties with whom we deal, including but not limited to our customers, contractors, agents and other third parties. We respect your rights to privacy under the Privacy Act 1988 (Cth) (Act) and we comply with all of the Act's requirements in respect of the collection, management and disclosure of your personal information.

This Privacy Policy will be continuously assessed against new technologies, business practices and our clients' needs. As we update and diversify our products and services, this Privacy Policy may evolve. Please check this page for updates periodically. We will try to post any changes to this Privacy Policy before they become effective. If we make any material changes to this Privacy Policy, we will notify you here, by email or by means of a notice on our Site's home page.

If you have questions or concerns regarding this Privacy Policy or wish to exclude your personal information from our direct marketing purposes, please feel free to contact us at [admin@home789.com.au](mailto:admin@home789.com.au) or by writing to us at, Suite4.05, Level 4, 161 Redfern Street, Redfern NSW 2016.

Please note: by using or registering with our Site or by providing personal information, you agree to the terms of this Privacy Policy.

## What is your personal information?

When used in this privacy policy, the term 'personal information' has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number, email address and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

## What personal information do we collect and hold?

We may collect the following types of personal information:

- name;
- mailing or street address
- telephone number;
- facsimile number;
- Email Address
- age or birth date;
- profession, occupation or job title;
- details of services you have enquired about, together with any additional information necessary to deliver those services and to respond to your enquiries;
- any additional information relating to you that you provide to us directly through our websites or indirectly through use of our websites or online presence, through our representatives or otherwise; and
- information you provide to us through our representatives or customer surveys from time to time.

We may also collect some information that is not personal information because it does not identify you or anyone else. For example we may collect anonymous answers to surveys or aggregated information about how users use our website.

## How do we collect your personal information

HOME789 will collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect in ways including:

- information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths);
- information that you provide to us when registering with our website (including your email address);
- information that you provide when completing your profile on our website (including your name, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details and employment details);
- information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters (including your name and email address);
- information that you provide to us when using the services on our website, or that is generated in the course of the use of those services (including the timing, frequency and pattern of service use);
- information relating to any purchases you make of our goods / services / goods and/or services or any other transactions that you enter into through our website (including your name, address, telephone number, email address and card details);
- information that you post to our website for publication on the internet (including your user name, your profile pictures and the content of your posts);
- information contained in or relating to any communication that you send to us or send through our website (including the communication content and metadata associated with the communication);
- any other personal information that you choose to send to us; and
- *provide details of other personal information collected.*

We may also collect personal information from third parties including: from third party companies such as credit reporting agencies, law enforcement agencies and other government entities.

Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy.

## Cookies

We use what are commonly called cookies when you use our Site. We use these cookies to identify you as a valid user, to ensure that no one else can sign on simultaneously with your account from another computer and to help us serve you better based on your registration preferences. We may also use cookies to help us facilitate any promotions or surveys that we provide. In some cases we may also collect your personal information through the use of cookies. When you access our website we may place a “cookie” (which is a small summary file containing a unique ID number) on your computer. This enables us to recognise you when you return and greet you each time you visit our website with any relevant preferences. It also enables us to keep track of services you view or preferences you have so that, if you consent, we can send you news about those services. We may also use cookies to measure traffic patterns, to determine which areas of our website have been visited and to measure transaction patterns in the aggregate. We use this to research our users’ habits so that we can improve our online services. Our cookies do not collect personal information. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.

We may log IP addresses (that is, the electronic addresses of a computer connected to the internet) to analyse trends, administer the website, track users movements and gather broad demographic information.

## What happens if we cannot collect your personal information?

If you do not provide us with the personal information described above, some or all of the following may happen:

- we may not be able to provide the requested services to you, either to the same standard or at all;
- we may not be able to provide you with information about our products and services that you may want; or
- we may be unable to tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful.

## For what purposes do we collect, hold, use and disclose your personal information?

We collect personal information about you so that we can perform our business activities and functions and provide best possible quality customer service.

We collect, hold, use and disclose your personal information for the following purposes:

- Administer our website and business;
- Personalise our website for you;
- Enable your use of the services available on our website;
- inform you of updates concerning HOME789;
- To provide services to you and to send communications requested by you;
- To update our records and keep your contact details up to date;
- Keep our website secure and prevent fraud;
- To assess the performance of the website and to improve its operation;
- Deal with enquiries and complaints made by or about you relating to our website;
- For the administrative, marketing (including direct marketing), planning, product or service development, quality control or research purposes of HOME789, its related bodies corporate, contractors or service providers;
- *Send statements, invoices and payment reminders to you, and collect payments from you;*
- To provide your updated personal information to our related bodies corporate, contractors or service providers;
  
- Send you our email newsletter, if you have requested it (you can inform us at any time if you no longer require the newsletter);
- To assess the performance of the website and to improve its operation;
- To conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- To provide your updated personal information to our related bodies corporate, contractors or service providers;
- Verify compliance with the terms and conditions governing the use of our website (including monitoring private messages sent through our website private messaging service); and
- To comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country (or political sub-division of a country).

Your personal information will not be shared, sold, rented or disclosed other than as described in this privacy policy.

All our website financial transactions are handled through our payment services provider, *PSP name*. You can review the provider's privacy policy at *URL*. We will share information with our payment services provider only to the extent necessary for the purposes of processing payments you make via our website, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

When you provide us with personal and account information, we will let you know how we may use such information. If you tell us that you do not want us to use this information as a basis for further contact with you (by accessing our opt-out procedure described below), we will respect your wishes. We may also offer options for you to sign up for our newsletters. During the registration process, you must provide us with a member name and password, your name, address and phone number and a valid email address. It is your responsibility to keep your password strictly confidential.

### **To whom may we disclose your information?**

We may disclose personal information to:

- Our employees, related bodies corporate, contractors or service providers for the purposes of operation of our website or our business, fulfilling requests by you and to otherwise provide services to you including, without limitation, share registry providers, custodians, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors, real estate agents and consultants;
- Suppliers and other third parties with whom we have commercial relationships for business, marketing and related purposes; and
- Any organisation for any authorised purpose with your express consent.

We may combine or share any information that we collect from you with information collected by any of our related bodies corporate.

### **Direct marketing materials**

**In order to keep our users informed about our latest news, products and services,** We may send you direct marketing communications and information about our services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, facsimile and email, in accordance with applicable marketing laws such as the Spam Act 2003 (Cth).

If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, at any time if you elected to opt-in to any of our email lists and later decide that you no longer wish to receive newsletters or promotional e-mail from us, you may unsubscribe from such list by following the instructions contained in each email we send to you to unsubscribe from such e-mail list. We will then ensure that your name is removed from our mailing list. We do not provide your personal information to other organisations for the purposes of direct marketing.

## How can you access and correct your personal information?

You may request access to any personal information we hold about you at any time by contacting us (see the details below). Where we hold information that you are entitled to access, we will try to provide you with a suitable means of accessing it (for example, by mailing or emailing it to you).

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or it would result in a breach of confidentiality. If that happens we will give you written reasons for the refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment then we will add a note to the personal information stating that you disagree with it.

## What is the process for complaining about a breach of privacy?

HOME789 requests that complaints about breaches of privacy be made in writing, so we can be sure about the details of the complaint. HOME789's Privacy Officer will normally deal with privacy complaints. HOME789 will attempt to confirm as appropriate and necessary with you your understanding of the conduct relevant to the complaint and what you expect as an outcome. HOME789 will inform you whether HOME789 will conduct an investigation, the name, title, and contact details of the investigating officer and the estimated completion date for the investigation process.

After HOME789 has completed its enquiries, we will contact you, usually in writing, to advise the outcome and invite a response to our conclusions about the complaint. If we receive a response from you, HOME789 will assess it and advise if HOME789 has changed its view. If you are unsatisfied with the outcome, HOME789 will advise further options including, if appropriate, review by the Privacy Commissioner with the Office of the Australian Information Commissioner.

## Do we disclose your personal information outside Australia?

We may disclose personal information to our related bodies corporate and third party suppliers and service providers located overseas for some of the purposes listed above.

We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information. We may disclose personal information to entities outside Australia, including the following:

- our data hosting and other IT service providers, located in Singapore

## Security

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information. HOME789 endeavors to protect the security of your personal information and your choices for its intended use. We use Secure Socket Layers or SSL technology to protect the transmission of sensitive personal information such as your credit card number. We store your personal information on a secure server, and use procedures designed to protect the personal information we collect from unauthorized access, destruction, use, modification or disclosure.

- We will store all the personal information you provide on our secure (password- and firewall-protected) servers.
- We may hold your information in either electronic or hard copy form. Personal information is destroyed or de-identified when no longer needed.
- All electronic financial transactions entered into through our website will be protected by encryption technology.
- You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet. We also cannot guarantee that the information you supply will not be intercepted while be transmitted over the public internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.
- You are responsible for keeping the password you use for accessing our website confidential; we will not ask you for your password (except when you log in to our website).

Although we will take (and require our third-party providers to take) commercially reasonable security precautions regarding your personal information collected from and stored on the Site, due to the open nature of the Internet, we cannot guarantee that any of your personal information stored on our servers, or transmitted to or from a user, will be free from unauthorized access, and we disclaim any liability for any theft or loss of, unauthorized access or damage to, or interception of any data or communications. By using the Site, you acknowledge that you understand and agree to assume these risks.



## Links

Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy policies of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices. We strongly advise you to review their privacy policies to find out how they are treating your personal information.

## Updating information

Please let us know if the personal information that we hold about you needs to be corrected or updated.

## Contacting us

You are always free to contact us with a question or problem related to your use of the Site. Our standard business practice is to retain any communications from our Site visitors to help us to serve each of you better

If you have any questions about this privacy policy, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please use the contact link on our website or contact our Privacy Officer using the details set out below.

**Privacy Officer:** [admin@home789.com.au](mailto:admin@home789.com.au)

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