

# Australian Privacy Policy

## 1 Introduction

TAC Global Pty Ltd ACN 605 075 447 (**we, our, us**) recognises the importance of protecting the privacy and the rights of individuals in relation to their personal information. This document is our privacy policy and it tells you how we collect and manage your personal information.

We respect your rights to privacy under the *Privacy Act 1988 (Cth)* (**Privacy Act**) and we comply with all of the Privacy Act's requirements in respect of the collection, management and disclosure of your personal information.

## 2 What is your personal information?

When used in this privacy policy, the term "personal information" has the meaning given to it in the Privacy 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.

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.

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

## 3 Information for tenants

If you are a tenant or potential tenant who wishes to use our services, we may collect the following types of personal information about you and the occupants and lease holders you have nominated in your application:

- name;
- current and previous mailing or street address;
- email address;
- telephone number;
- drivers licence number and / or passport number;
- age and / or birth date;
- Images and details of – and information contained in – identity documents ( such as passport, drivers licence, etc);
- image of you
- payment information
- your user name and password

- information on how you use our products and services including your internet Protocol ('IP') address, server address, domain name and information on your browsing activity when visiting our website and;
- Personal preferences regarding products and services
- details of your current and past rental history and employment history;
- details of the properties you may be interested in letting, together with any additional information necessary for us to deliver our services to and to respond to your enquiries; and
- information you provide to us during telephone calls or in emails to our representatives from time to time.
- When you use our service, you may provide us with personal information (including name, address and contact details) of other occupants and lease holders who wish to relocate. When you provide us with personal information about occupants and lease holders who wishes to relocate using our services, you are responsible for informing the occupants and lease holders that you have disclosed their personal information to us.

We collect personal information about you so that we can perform our business activities and functions and to provide best possible quality of customer service. We collect, hold, use and disclose your personal information for the following purposes:

- to provide our services to you;
- to send communications requested by you;
- to answer enquiries and provide information or advice about existing and new services;
- to provide you with access to protected areas of our website;
- with your permission, to provide your information to real estate agents who are leasing properties you may be interested in;
- to liaise with your relocation agent and your employer in relation to your application and property needs
- to assess the performance of our website and to improve the operation of our website;
- to conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- for the administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes;
- to provide your updated personal information to our contractors or service providers;
- to update our records and keep your contact details up to date;
- to process and respond to any complaint made by you; 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.

## 4 Information for employers and businesses

As part of setting up your account with us, we will collect the name, address and contact details of your authorised representative(s). When you use our service, you may provide us with personal information (including name, address and contact details) of your employees or contractors who wish to relocate. When you provide us with personal information about an employee or contractor who wishes to relocate using our services, you are responsible for informing your employee or contractor that you have disclosed their personal information to us.

We collect personal information about you so that we can perform our business activities and functions and to provide best possible quality of service to you and your employees and contractors. We collect, hold, use and disclose your personal information for the following purposes:

- to provide our services to you;
- to manage our relationship with you, including to provide our services to you and your employees and contractors and to bill you for our services;
- to send communications requested by you;
- to answer enquiries and provide information or advice about existing and new services;
- to provide you with access to protected areas of our website;
- to liaise with your employees, contractors and their authorised relocation agents;
- to assess the performance of our website and to improve the operation of our website;
- to conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- for the administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes;
- to provide your updated personal information to our contractors or service providers;
- to update our records and keep your contact details up to date;
- to process and respond to any complaint made by you; 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.

## 5 Information for real estate agents

As part of setting up your account with us, we will collect the name, address and contact details of your authorised agent(s).

We collect personal information about you so that we can provide our services to our customers and clients and to liaise with you in relation to their property needs. We collect, hold, use and disclose your personal information for the following purposes:

- to provide our services to our customers and clients;

- to communicate with you and otherwise to manage our relationship with you, including to contact you in relation to managing our customers' and clients' property needs;
- to answer enquiries and provide information or advice about existing and new services;
- to provide you with access to protected areas of our website (including information and documents provided by our clients and customers);
- to liaise with our customers and clients and their authorised relocation agents or employer;
- to assess the performance of our website and to improve the operation of our website;
- to conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- for the administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes;
- to provide your updated personal information to our contractors or service providers;
- to update our records and keep your contact details up to date;
- to process and respond to any complaint made by you; 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.

When we provide you with personal information about a potential tenant who is looking to relocate you are responsible for informing the potential tenant about your own privacy practices.

## **6 Information for relocation agents**

As part of setting up your account with us, we will collect the name, address and contact details of your authorised representative(s) and contacts. When you use our service, you may provide us with personal information (including name, address and contact details) of your clients or contractors who wish to relocate. When you provide us with personal information about a or contractor who wishes to relocate using our services, you are responsible for informing your client or contractor that you have disclosed their personal information to us.

We collect personal information about you so that we can provide our services to our customers and clients and to liaise with you, employers and real estate agents in relation to their property needs. We collect, hold, use and disclose your personal information for the following purposes:

- to provide our services to our customers and clients;
- to communicate with you and otherwise to manage our relationship with you, including to contact you in relation to managing our customers' and clients' property needs;
- to answer enquiries and provide information or advice about existing and new services;

- to provide you with access to protected areas of our website (including information and documents provided by our clients and customers);
- to liaise with our customers and clients and with real estate agents who may have properties that suit their needs;
- to assess the performance of our website and to improve the operation of our website;
- to conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- for the administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes;
- to provide your updated personal information to our contractors or service providers;
- to update our records and keep your contact details up to date;
- to process and respond to any complaint made by you; 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.

When we provide you with personal information about a potential tenant who is looking to relocate, you are responsible for informing the potential tenant about your own privacy practices.

## **7 How do we collect your personal information?**

We 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:

- when you make an enquiry about our services;
- through your access and use of our website, including when you register as a member of our website;
- during conversations between you and our representatives;
- when you ask to be placed on one of our mailing lists; or
- when you become a client or customer of ours or otherwise use our services.

In some circumstances, we may collect personal information about you from third parties. If you are a tenant, we may collect personal information about you from your employer, your relocation agent, any third parties you provide as referees (such as past landlords, real estate agents and / or personal referees), any third parties who operate residential tenancy databases or similar rental history checking services or that you authorise to provide personal information to us.

## **8 What happens if we can't 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 our services to you, either to the same standard or at all;
- we may not be able to provide you with information about services that you may want, including information about special promotions; or
- we may be unable to tailor the content of our website to your preferences and your experience of our website may not be as enjoyable or useful.

## **9 Our website**

Our privacy policy also applies to our website at [www.appruvi.com](http://www.appruvi.com)

### **Cookies**

When you access our website, we may send a “cookie” (which is a small summary file containing a unique ID number) to your computer. This enables us to recognise your computer and greet you each time you visit our website without bothering you with a request to register. It also enables us to keep track of services you view so that, if you consent, we can send you news about those services. We 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 computers connected to the internet) to analyse trends, administer the website, track users movements, and gather broad demographic information.

### **Security**

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

### **Links**

We provide links to websites outside of our website, as well as to third party websites. These linked sites are not under our control, and we cannot accept responsibility for the conduct of companies linked to our website. Before disclosing your personal information on any other website, we advise you to examine the terms and conditions of using that websites and its privacy policy. Third party websites are responsible for informing you about their own privacy practices.

## **10 Who do we disclose your information to?**

We may disclose your personal information to:

- our employees, 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, 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 and consultants;

- suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes; and
- any other 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.

If you are a tenant, we may disclose your personal information to third party operators of residential tenancy databases, real estate agents and landlords in connection with your leasing of a residential property and the processing of your Application.

## **11 Direct marketing materials**

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, fax 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 you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and 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.

## **12 Do we disclose your personal information to anyone outside Australia?**

We may disclose personal information to our related bodies corporate or licensees 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 your personal information to entities located outside of Australia, including the following:

- your employer relocation agent, personal referees or other third parties in the country in which you currently reside or have resided;
- our related bodies corporate located in United Kingdom
- our data hosting and other IT service providers, located in India and Australia.

## **13 Security and data quality**

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure.

We strive to ensure the security, integrity and privacy of personal information that you submit to us through our website. Unfortunately, no data transmission over the Internet can be guaranteed to be totally secure. We endeavour to take all reasonable steps to protect the personal information you may transmit to us or from our online products and services.

Once we do receive your transmission, we will also make our best efforts to ensure its security on our systems.

In addition, our employees and the contractors who provide services related to our information systems are obliged to respect the confidentiality of any personal information held by us.

We may hold your information in either electronic or hard copy form. Personal information is destroyed or de-identified when no longer needed or when we are no longer required by law to retain it (whichever is the later).

#### **14 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 suitable means of accessing it (for example, by mailing or emailing it to you). We may charge you a reasonable fee to cover our administrative and other reasonable costs in providing the information to you. We will not charge for simply making the request and will not charge for making any corrections to your personal information.

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 if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

#### **15 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 correction. If we do not agree that there are grounds for correction 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?**

#### **16 If you believe that your privacy has been breached, please contact us using the contact information below and provide details of the incident so that we can investigate it. We will treat your complaint confidentially, investigate your complaint and aim to ensure that we contact you and your complaint is resolved within a reasonable time (and in any event within the time required by the Privacy Act, if applicable). Contacting us**

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 contact our] **Privacy Officer** using the details set out below. We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in timely and appropriate manner.

Please contact our Privacy Officer] at:

Email: [privacy@appruvi.com](mailto:privacy@appruvi.com)



## **17 Changes to our privacy policy**

We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website and will be effective from the date of posting.

This privacy policy was last updated on 02/11/2023