

PRIVACY POLICY

OUR COMMITMENT TO PRIVACY

This Privacy Policy relates to Urbanfinity Pty Ltd and its related bodies corporate (“Urbanfinity”, “we”, “us” and “our”).

We appreciate that privacy is important to everyone. We are committed to complying with the Australian Privacy Principles ("APPs") which are contained in the *Privacy Act* 1988 (Cth).

Where the information obtained by us is subject to the New Zealand Privacy Act 1993 ("NZ Privacy Act"), we will also comply with that Act and the Information Privacy Principles ("IPPs") contained in that Act.

This Privacy Policy outlines the type of personal information we collect, how that information is collected, used, stored and protected, and to whom we may disclose your personal information. We may also provide you with additional information about how Urbanfinity will use your personal information at the time that it is collected.

1. WHAT IS PERSONAL INFORMATION?

When we refer to “personal information” we mean information or an opinion about you, from which you are, or may reasonably be, identified.

This information may include (but is not limited to) your name, date of birth, driver's licence number, phone number, email address, address, nationality and employment history.

Due to the nature of the services provided by us, we do not collect sensitive information (such as information about your religion, trade union membership, political opinion, health, sexual preference or criminal record) or credit information (information about loans that may have been provided to you) about you.

The personal information which Urbanfinity collects may include:

- customers or potential customers and suppliers or potential suppliers – names, postal addresses, telephone number and email addresses.

Urbanfinity may also store other information that may be considered as personal information, including IP addresses and Urbanfinity-generated user credentials.

2. WHY DO WE COLLECT YOUR PERSONAL INFORMATION AND HOW DO WE USE YOUR PERSONAL INFORMATION?

We collect and use your personal information to perform our functions and activities, carry out our operations and to otherwise enable us to provide the services, products and information you request. Particularly, we may collect and use your personal information for the purposes of:

- responding to your requests or inquiries and providing you with any information or other services requested by you;
- providing you with access to our website, including all associated Urbanfinity APIs;
- notifying you about important changes or developments to our functions, activities, services or our website;
- administering, supporting, improving and developing our business and services;
- any other purpose which relates to or arise out of requests made by you;
- if you lodge a complaint with us, processing and responding to your complaint;
- data analytics;
- doing anything which you authorise or consent to us doing; or
- taking any action we are required or authorised by law to take.

If you cease using our products and services, we may retain your personal information to comply with regulatory requirements and may periodically contact you to offer you the opportunity to use our products and services again or to participate in other valuable offers (should you choose to receive such information).

3. HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

Most of the personal information we collect will be directly from you for purposes as described above. If you do not provide the information requested by us, we may not be able to provide you with our services, or to assist you with your specific needs.

Enquiries about Urbanfinity and requesting a quote for Urbanfinity's products or services

We will collect personal information about you in various ways and at several different points if you choose to provide it to us. For example:

- if you send us an email to enquire about our website or licence terms, or provide us with information about yourself through the website;
- if you consent to us recording a telephone conversation with our representatives;
- when you complete an application form for one of our products or services; or
- when you provide details to us to enable us provisioning access to our products or services.

We also collect personal information about you from third parties that you have authorised to provide us with this information. For example, we may be provided with your personal information by LinkedIn or other similar service providers.

Website Use

Our server automatically collects information about your use of the website ("Navigational Data"). Navigational Data includes (a) the type of browser you are using, (b) your domain type and server, (c) your IP address, (d) the URL you have come from, (e) the pages of our website that you have visited, date/time stamp and the time spent on those pages, (f) the approximate location of where you accessed our services (if you have opted in to this function), (g) cookies, (h) Urbanfinity-generated user credentials, (i) personal information as set out in section 1, "What is Personal Information", above, and (j) other statistics. This kind of information is collected by many sites. We perform statistical and other analysis on the Navigational Data to (i) analyse and measure user behaviour and trends, (ii) to understand how people use our services, and (iii) to monitor, troubleshoot and improve our services, including to help us evaluate or devise new features. We may also use Navigational Data for internal purposes designed to keep our services secure and operational, such as troubleshooting and testing purposes, and for service improvement, marketing, research and development purposes and to monitor your use of our website and your compliance with our licence terms. In addition, we may use third party services to help Urbanfinity collect, monitor and analyse the Navigational Data. Occasionally, we may connect personal information to Navigational Data to improve our services for individual customers, where necessary. If we do this, we will treat the combined information in accordance with this Privacy Policy.

When you use our website, cookies will be placed on your computer to keep track of your use of our website. For example, cookies allow us to remember which Urbanfinity image you were viewing when you last visited our website. Cookies do not capture or track any personal information. However, you may elect to set your computer so that cookies are not placed on your computer.

Third Party Personal Information

If you provide personal information to us about someone else, you must ensure that you are entitled to disclose that information to us and that, without us taking any further steps required by privacy laws, we may collect, use and disclose such information for the purposes described in this Privacy Policy. For example, you should take reasonable steps to ensure the individual concerned is aware of the various matters detailed in this Privacy Policy. The individual must also provide the consents set out in this Privacy Policy in respect of how we will deal with their personal information.

4. WILL PERSONAL INFORMATION BE GIVEN TO ANYONE ELSE?

In the circumstances described below, personal information may be disclosed outside of our organisation.

Third party contractors

Personal information collected by us may be disclosed to third parties to whom we contract out specialised functions (such as our website hosts). If we do disclose personal information to third party contractors under outsourcing or contracting arrangements, we take steps to ensure that those contractors:

1. comply with the APPs (and the IPPs, if applicable) when they handle your personal information; and
2. are authorised only to use personal information in order to provide the services or to perform the functions required by us.

Disclosures required by law

For legal reasons, other disclosures may need to be made to law enforcement agencies, government agencies, courts or external advisors or in accordance with other laws.

Other disclosures

We do not sell, rent or trade personal information to or with third parties.

By providing us with your personal information, you consent to us disclosing your information to the entities set out in in this Privacy Policy without obtaining your consent on a case by case basis.

We may from time to time transfer personal information outside Australia and New Zealand in accordance with the relevant Privacy Act to countries whose privacy laws do not provide the same level of protection as the privacy laws in Australia or New Zealand. For example, we may transfer your personal information to the Asia-Pacific, European Union or the United States of America. We may also use cloud storage and IT servers that are located offshore. We will not transfer your personal information to any location that is prohibited in accordance with the relevant Privacy Act.

By providing us with your personal information, you consent to us disclosing your information to entities located outside Australia and New Zealand and, when permitted by law to do so, on the basis that we are not required to take such steps as are reasonable in the circumstances to ensure that any overseas recipient complies with Australian or New Zealand (as applicable) privacy laws in relation to your information.

5. DIRECT MARKETING

From time to time we may use your personal information to provide you with current information about our products and services, special offers you may find of interest, changes to our organisation, or new products or services being offered by us or any company we are associated with. By providing us with your personal information, you consent to us using your information to contact you on an ongoing basis for this purpose, including by mail, email, SMS, social media and telephone.

If you do not wish to receive marketing information, you may at any time decline to receive such information by contacting our Privacy Contacts using the contact details below. We will not charge you for giving effect to your request and will take all reasonable steps to meet your request at the earliest possible opportunity.

6. UPDATING YOUR PERSONAL INFORMATION

It is important to our relationship that the personal information we hold about you is accurate and up to date. If at any time you are of the view that personal

information about you is not accurate, complete or up to date, please write to us with your request for correction. Our policy is to consider any requests for correction in a timely manner. We will not be responsible for any incorrect or incomplete personal information or any consequences arising directly or indirectly from incorrect or incomplete personal information.

7. ACCESS TO YOUR PERSONAL INFORMATION

Under the Privacy Act, you have a right to seek access to information which we hold about you (subject to the limited exceptions set out below).

If you wish to exercise your right under the Privacy Act to seek access to the personal information that we hold about you, we ask that you write to us and we will explain how we handle your access request. We may charge you for the cost of providing access to these records.

8. DENIED ACCESS TO PERSONAL INFORMATION

There may be situations where we are not required to provide you with access to your personal information. For example, such a situation would be information relating to an existing or anticipated legal proceeding with you, or if your request is vexatious.

An explanation will be provided to you if we deny you access to your personal information we hold.

9. IS PERSONAL INFORMATION STORED SAFELY?

We take reasonable steps to ensure the security of personal information held by us from such risks as loss or unauthorised access, destruction, use, modification or disclosure. Our IT systems are password protected and comply with our security standards, and if personal information is held on paper files, it is stored in premises that are locked when unattended.

10. BUSINESS WITHOUT IDENTIFYING YOU

In most circumstances it will be necessary for us to identify you in order to successfully do business with you, however, where it is lawful and practicable

to do so, we will offer you the opportunity of doing business with us without providing us with personal information.

11. THIRD PARTY WEBSITES

Sometimes our website contains links to other websites, for your convenience and information. When you access a website other than www.Urbanfinity.com.au or www.siteanalytics.com.au, please understand that we are not responsible for the privacy practices of that site. We recommend that you review the privacy policies of each site you visit.

12. FURTHER INFORMATION AND COMPLAINTS

You may request further information about the way we manage your personal information or lodge a complaint by contacting our Privacy Officer(s) on the contact details below.

We will deal with any complaint by investigating the complaint, and providing a response to the complainant within a reasonable time, provided that we have all necessary information and have completed any investigation required. In cases where further information, assessment or investigation is required, we will seek to agree alternative time frames with you.

13. CONTACTING US

You can contact us by:

1. sending an e-mail to us at: service@urbanfinity.com.au; or
2. writing to us at:
Urbanfinity Pty Ltd
Suite 5.04 L5, 161 Gloucester St
The Rocks NSW 2000
Australia

14. CHANGES TO THIS PRIVACY POLICY

We might change this Privacy Policy from time to time and any updates to our Privacy Policy will be published on our website. You need to ensure that you review our Privacy Policy on a regular basis. If you continue to use our website after we change our Privacy Policy, you will be taken to have

accepted the new Privacy Policy. This policy was last updated on 17 June 2020.

By visiting our website, requesting a quote, renewing or using any of our products or services or providing us with your personal information, you agree to your personal information being collected, held, used and disclosed as set out in this Privacy Policy.