## **GENERAL PRIVACY POLICY**

Your privacy is important to Home Affordability Solutions.

Home Affordability Solutions recognises the trust you are placing in us through your dealings with us and providing confidential personal information to us. We are committed to the protection of your personal information and our policies comply with our obligations under the Australian Privacy Principles that form part of the Privacy Act 1988 (Cth), which are intended to protect your privacy in respect of any personal information that you may provide to us.

Home Affordability Solutions ABN 49 611 323 169 "HAS". may collect personal and other information in the circumstances set out below. What personal information does HAS generally collect and why:

#### Customers

HAS collects information from customers in a number of different ways. These may be in connection with signing up to email or mobile newsletters. Customers provide us with their contact details.

HAS collects these details to inform customers about HAS events, activities, products and promotions. Customers have the option to opt out from receiving this information at any time by informing HAS in writing.

In addition to the above, this information may be used by HAS in connection with the management, and may be provided to law enforcement and government bodies, insurers, HAS staff and subcontractors, third parties who provide HAS with services from time to time.

Additionally, HAS also may promote certain online activities through the HAS websites. The collection of personal information through these activities and information associated with the HAS websites is dealt with in the HAS Online Privacy Policy.

### Suppliers

If you, or a company you work for, supplies goods or services to HAS, HAS may collect personal information about you in connection with the provision of those goods or services, either directly from you or from that company.

This information may include your name, date of birth, contact information, and any other information you provide, or provided on your behalf, as part of our induction and compliance processes. This information will be used for the purposes of managing the provision of those good or services.

## **Employees**

If you are employed by a member of HAS, HAS may collect personal information about you in connection with your employment.

This information may include your name, date of birth, contact information, and any other information you provide, or provided on your behalf, as part of our induction and compliance processes.

This information will be used for the purposes of managing your employment, in accordance with the requirements of the Privacy Act 1988 (Cth). You need to ensure this information is up to date, in accordance with HAS's policies and procedures.

#### **Unsolicited Information**

If we receive personal information about you that we did not ask for either directly from you, from someone on your behalf, or through someone on our behalf, and we determine that we could have collected this information from you had we asked for it, we will take reasonable steps to notify you, as soon as practicable, that we have collected your personal information.

If we could not have collected this personal information, we will lawfully de-identify or destroy that personal information. Any unsolicited information provided by you, someone on your behalf or someone on our behalf, will be used for the purposes for which it was provided.

#### Other information we collect

We may also collect the following information from you:

- the fully qualified domain name from which you accessed our websites, or alternatively, your IP address;
- the date and time you accessed each page on our websites;
- the URL of any webpage from which you accessed our websites (the referrer);
- cookies which track your visits to the our web sites;
- you accessed; and
- a HubSpot tracking code which uses cookies or similar technologies to track visitors. We use the information gathered to improve our website functionality, the user experience and to tailor our content. Hubspot CRM enables us, among other things, to manage existing and potential customers and customer contacts. With the help of Hubspot CRM, we are able to capture, sort, and analyse customer interactions via email, social media, or phone across different channels. The personal data collected in this way can be evaluated and used for communication with the potential customer or for marketing measures (e.g. newsletter mailings). With Hubspot CRM, we are further able to record and analyse the user behaviour of our contacts on our website.

We use this information so that we can tell which pages are the most popular and how to improve our website. If this information is linked with personal information we hold about you as set out above, this information becomes personal information and will be treated in the same manner as the personal information to which it has been linked.

#### Who collects the information

Personal information collected about individuals (as described above) may be collected by, or on behalf of members of HAS. Information may also be collected by HAS on behalf of other people as set out in notices given to individuals, or consents given by individuals, at or prior to the time the personal information is collected.

## Right of access to your information

You have the right to access, update and correct your personal information held by us. We will take reasonable steps to ensure that personal information is up-to-date, accurate and complete. If you wish to access, update or correct your personal information held by us, please contact our Privacy Officer.

# How your personal information is stored and kept secure

All personal information collected by HAS is held securely, whether on HAS 's physical files, computer systems or in a database (which may be hosted by HAS or a third party on HAS's behalf).

This information is only made available to HAS staff on a 'need to know' basis or to other people as outlined in this policy who have agreed to treat that information confidentially. These databases are protected by a firewall as well as host-based security.

Your personal information may be transmitted over the Internet once it has been stored in a database, and may be stored on servers, using databases or via cloud technology in a number of countries other than Australia, including regions such as the Americas, the European Union and Asia, where doing so is part of HAS's ordinary business practices relating to the storage of data and where permitted by law.

If HAS ever has a requirement to transmit such data over the Internet (for example, to make an off-site back up) it will be in encrypted form. By providing us with your personal information, you consent to these transfers.

We will use all reasonable endeavours to keep your personal information in a secure environment, however, this security cannot be guaranteed due to the nature of the internet.

These measures are designed to assist in your personal information not being accessed by unauthorised personnel, lost or misused. If you reasonably believe

that there has been unauthorised use or disclosure of your personal information please contact us.

All reasonable steps are taken by us to ensure that your personal information held by us is accurate, complete and up to date.

If you believe that any of your personal information is inaccurate, please contact us and we will take all reasonable steps to correct it within a reasonable timeframe.

## Disclosing your personal information

We understand how important it is to keep your personal information private, so we will disclose personal information we have about you only in certain specific circumstances, when:

- you agree to the disclosure;
- we use it for the purposes we collected it; or
- disclosure is required or authorised by law.

To the extent permitted by law, we may also disclose information about you to:

- related companies for marketing purposes;
- third parties who provide services to HAS from time to time;
- government agencies as part of our statutory obligations, or as otherwise permitted by law.