

# MANAGE MY RENO PRIVACY POLICY

## 1. Introduction

- (a) Our website application (located at [www.managemyreno.com.au](http://www.managemyreno.com.au)) (the **Manage My Reno Platform**) and the Services made available through the Manage My Reno Platform are created, owned and operated by Manage My Reno Pty Ltd (ACN 657 440 483) (**Manage My Reno, our, us or we**).
- (b) Manage My Reno is committed to ensuring your Personal Information is protected. Manage My Reno manages your Personal Information in accordance with the Australian Privacy Principles set out in the Privacy Act 1988 (Cth) (**Privacy Act**).
- (c) By accessing and using the Manage My Reno Platform you agree to this Privacy Policy.
- (d) This Privacy Policy outlines how Manage My Reno collect, store, process, share, use and disclose your Personal Information, and how you may access your Personal Information kept by us or how you may make a privacy complaint.
- (e) For the purpose of this Privacy Policy, **Services** means the tools, templates, checklists and guides that assist home renovators to project manage the renovation, repair or refurbishment of their homes, offices or dwellings.

## 2. The information Manage My Reno collects about you

### 2.1. Personal Information

- (a) **Personal information** has the same meaning that it has under the Privacy Act, namely, information means information or an opinion about an identified individual or an individual who is reasonably identifiable, whether the information or opinion is true or not and recorded in a material form or not.
- (b) Manage My Reno collect and use Personal Information and Non-Personal Information from visitors and users of the Manage My Reno Platform and Services, and any other individual who interacts with us.
- (c) Manage My Reno will only collect and hold Personal Information about you that is reasonably necessary to undertake our business activities and functions, make the Manage My Reno Platform available to you and deliver our Services to you, or as otherwise permitted by law.
- (d) The type of Personal Information and non-Personal Information that Manage My Reno collects and uses depends on the type of dealings that you have with Manage My Reno and includes the following:
  - (i) contact details and account registration information (for example, full name, phone number, email address, state, postcode and country, username and password);
  - (ii) information relating to your renovation, refurbishment or repair, including, but not limited to, the location of your renovation project.

- (iii) marketing data and information relating to your dealings, or enquiries you have made, with us, including information about the Services you have purchased and used;
- (iv) payment and billing information;
- (v) device information which is automatically collected from you when you visit and navigate through the Manage My Reno Platform and use the Services. Such information may include, but is not limited to, your device type, your device's network connections, unique device identifier, your device's name, your device IP address, screen size and calibration, information about your device's web browser and internet connection you use to access the Manage My Reno Platform or Services, geolocation information, browser characteristics, device characteristics, operating system and language preferences, dates and times of visits to the Manage My Reno Platform and other usage statistics; and
- (vi) other information that you provide to us or that we may collect in the course of our relationship with you.

## **2.2. Sensitive Information**

- (a) We do not collect your Sensitive Information (as defined by the Privacy Act). However, some of our services are automated and we may not recognise that you have accidentally provided us with Sensitive Information.
- (b) If you have accidentally sent us Sensitive Information, please contact us using the details below.

## **3. How Manage My Reno collect Personal Information**

### **3.1. Direct collection from you**

- (a) We will collect Personal Information and non-Personal Information about you in a number of different ways. We may collect Personal Information and non-Personal Information directly from you or in the course of our dealings with you. For example, when you:
  - (i) setup and create a profile on the Manage My Reno Platform (including when you edit or update your profile on the Manage My Reno Platform or reset your password) and when access and use the Manage My Reno Platform and Services;
  - (ii) input or submit information, material or data on, or via, the Manage My Reno Platform;
  - (iii) contact or correspond with us online (for example, when you complete online forms, or subscribe to our publications, alerts and newsletters), request customer support services, contact us via email or telephone with a query or request or make a comment on our social media sites or you participate in a promotion, competition or survey;
  - (iv) when you otherwise interact or communicate with us, such as by telephone, email or in person; or
  - (v) from publicly available sources of information.

### **3.2. Collection from third parties**

- (a) We may also collect Personal Information about you from publicly available sources and third parties, including:
  - (i) when you provide your Personal Information to third parties (including to our related bodies corporate, business partners, service providers and third party contractors);
  - (ii) if you use our social media sites or applications or other third party products and services that interact with, or connect with, the Manage My Reno Platform; and
  - (iii) if third party payment processors are used by us to process payments made by you.
- (b) When Manage My Reno collects your Personal Information from third parties, we shall take reasonable steps to make sure you are aware of the collection.
- (c) If you provide us with Personal Information about another individual (as their authorised representative), we rely on you to:
  - (i) inform them that you are providing their Personal Information to us; and
  - (ii) advise them that they can contact us for further information.
- (d) You must take reasonable steps to ensure the individual is aware of, and consents to, the matters outlined in this Privacy Policy, including that their Personal Information is being collected, the purposes for which that information is being collected, the intended recipients of that information, the individual's right to access that information, and who we are and how to contact us.

## **4. How Manage My Reno uses your Personal Information**

### **4.1. Purposes of use and disclosure**

- (a) Manage My Reno only uses, process and disclose your Personal Information for the purposes for which it is collected.
- (b) In particular, Manage My Reno use, process and disclose your Personal Information to:
  - (i) provide you with access to, and use of, the Manage My Reno Platform and/or the Services;
  - (ii) manage, operate, maintain, test, develop, improve and upgrade the Manage My Reno Platform, the Services or other products and services offered by us from time to time; and
  - (iii) notify you of opportunities we think you might be interested in, including new product or service offerings, information about the Manage My Reno Platform, Services, offers, competitions, promotions, events and surveys;
  - (iv) to customise the advertising and content on the Manage My Reno Platform;

- (v) to verify your identity;
  - (vi) to conduct fraud, risk reduction and creditworthiness checks;
  - (vii) to perform research and analysis about the Manage My Reno Platform and the Services and for data analytics purposes, including usage patterns, trends, benchmarking and other statistical or behavioural data. Before we use your Personal Information for this purpose, we ensure Personal Information is made anonymous by removing data that can identify you;
  - (viii) charge and bill when you purchase and use the Manage My Reno Platform and Services;
  - (ix) for direct marketing purposes (see section 6 below);
  - (x) to comply with regulatory or other legal requirements,
  - (xi) for any purpose to which you have consented; and
  - (xii) for any other purpose notified to you at the time of collection.
- (c) In the event of a merger, acquisition or sale of the whole or part of our business or assets, we reserve the right to transfer your Personal Information as part of the transaction, without your consent or notice to you.

#### **4.2. Disclosure to third parties**

- (a) With your consent, we may provide your Personal Information and Non-Personal Information to the following recipients:
- (i) our employees, related entities, business partners, third party contractors, suppliers and agents from time to time for the purpose of delivering, providing and administering the Services (including customer support services and setup services), the Manage My Reno Platform, our promotions, deals and competitions;
  - (ii) third party service providers who process or use your Personal Information and Non-Personal Information for the purpose of performing functions on our behalf, but may not process or use such information for any other purpose. Examples of these third-party service providers include, but are not limited to, such as cloud-based accounting software platform; couriers and delivery service providers, marketing and analysis organisations, financial and credit card institutions to process payments, hosting companies, web developers, internet service providers, customer service providers, customer support specialists, fulfilment companies and research and data analysis firms, government agencies, public registries, search agencies, regulatory and licensing bodies, parties to whom you refer us (for example, previous employers and referees); and
  - (iii) external business advisors, such as auditors, lawyers, insurers and financiers,
- (collectively, **Authorised Affiliates**).
- (b) When we disclose your Personal Information to any of our Authorised Affiliates, we will ensure that they undertake to protect your privacy. Authorised Affiliates are not permitted to use the information for any purpose other than the purpose for which they have been given access.
- (c) Our Authorised Affiliates may also provide us with Personal Information collected from you. If you disclose Personal Information to an Authorised Affiliate, we rely

on you to provide the Authorised Affiliates with consent for us to collect, storage, use, process, alter and disclose your Personal Information.

- (d) Manage My Reno may also disclose any Personal Information we consider necessary to comply with any applicable law, regulation, legal process, governmental request or industry code or standard.

### **4.3. Third party payment processors**

Manage My Reno use third party payment processors to process payments made to us. In connection with the processing of such payments, Manage My Reno do not collect, process, use, share, store or disclose any payment information (such as credit card and bank account details). Rather, all such information is provided directly to Manage My Reno's third party processors, Apple Pay and Google Pay, whose use of your Personal Information (including payment information) is governed by their privacy policy, which may be viewed at <https://www.apple.com/au/legal/privacy/data/en/apple-pay/> and <https://policies.google.com/privacy>.

### **4.4. Overseas disclosure**

- (a) In the course of providing you with access to, and use of, the Manage My Reno Platform and Services, it may become necessary or desirable to disclose Personal Information to Authorised Affiliates located overseas. The countries in which these overseas recipients may be located will depend upon the individual circumstances. However, in the course of our ordinary business operations we commonly disclose Personal Information to our third party payment processors located outside of Australia, including the United States and elsewhere in the world.
- (b) The laws where these overseas recipients may be located provide various levels of protection for Personal Information which are not always equivalent to the level of protection that may be provided for in Australia. Where we transfer your Personal Information overseas, Manage My Reno will take reasonable steps to ensure that your Personal Information is treated securely, and the means of transfer provides adequate safeguards.
- (c) By accessing or using the Manage My Reno Platform and/or Services or providing your Personal Information to us, you explicitly and freely consent to the transfer of your Personal Information to our overseas Authorised Affiliates. If you do not wish to receive information from any of our Authorised Affiliates, please let us know using the details below. However, if you do not provide your Personal Information to us or our Authorised Affiliates, we may not be able to provide you with access to, and use of, the Manage My Reno Platform and the Services.

### **4.5. Disclaimer**

- (a) Manage My Reno will not disclose your Personal Information to any third party (other than our Authorised Affiliates) without your written consent, unless:
  - (i) we are otherwise required by the relevant Privacy Laws;
  - (ii) we are permitted to under this Privacy Policy; or
  - (iii) such disclosure is, in our opinion, reasonably necessary to protect our rights or property, avoid injury to any person or ensure the proper functioning of the Manage My Reno Platform.

- (b) This Privacy Policy only covers the use and disclosure of information we collect from you. The use of your Personal Information by any third party is governed by their privacy policies and is not within our control.

## **5. Notifiable Data Breaches Scheme**

In the event of any loss, or unauthorised access or disclosure of your Personal Information that is likely to result in serious harm to you, Manage My Reno will investigate and notify you and the Australian Information Commissioner as soon as practicable, in accordance with notifiable data breach scheme contained in Part IIIC of the Privacy Act.

## **6. Marketing communications**

### **6.1. Direct marketing**

- (a) Manage My Reno may use and disclose your Personal Information to send you information about the Manage My Reno Platform and/or Services and any other products or services we may offer from time to time, as well as other information that may be of interest to you.
- (b) These communications may continue, even after you stop using the Manage My Reno Platform and the Services.

### **6.2. Communication channels**

- (a) Manage My Reno may send this information to you via the communication channels specified at the time you provide your consent.
- (b) These communication channels may include mail, email, SMS telephone, social media or by customising online content and displaying notices or advertising on the Manage My Reno Platform.

### **6.3. Opting-out**

You can opt out of receiving these communications by:

- (a) contacting us using the details below; or
- (b) using the unsubscribe function in the email or SMS.

## **7. Storage and security**

### **7.1. Protecting your Personal Information**

- (a) We take reasonable steps in the circumstances to keep your Personal Information and Non-Personal Information safe. We use a combination of technical, administrative, and physical controls to protect and maintain the security of your Personal Information.
- (b) Our officers, employees, agents and third-party contractors are expected to observe the confidentiality of your Personal Information and Non-Personal Information.
- (c) Wherever possible, we procure that Authorised Affiliates who have access to your Personal Information and Non-Personal Information take reasonable steps to:
  - (i) protect and maintain the security of your Personal Information and Non-Personal Information; and

- (ii) comply with the Australian Privacy Principles when accessing and using your Personal Information.

## **7.2. No guarantee**

- (a) The transmission of information via the internet is not completely secure. While we do our best to protect your Personal Information and Non-Personal Information, we cannot guarantee the security of any Personal Information and Non-Personal Information transmitted through the Manage My Reno Platform.
- (b) You provide your Personal Information and Non-Personal Information to us at your own risk, and we are not responsible for any unauthorised access to, and disclosure of, your Personal Information and Non-Personal Information.

## **7.3. Destruction of Personal Information**

We will destroy or de-identify Personal Information where it is no longer required, unless we are required or authorised by law to retain the information. However, Manage My Reno may retain Personal Information (including basic registration information) in accordance with documentation retention and destruction laws.

## **8. Accessing and correcting your Personal Information**

- (a) Manage My Reno shall use our reasonable endeavours to keep your Personal Information accurate, up-to-date and complete. You have the right to access any Personal Information we hold about you, subject to some exceptions under the Privacy Act.
- (b) You can access, or request that we correct, your Personal Information by writing to us using the details below. Manage My Reno may require proof of identity. If we do not allow you to access any part of your Personal Information, we will tell you why in writing.
- (c) We will not charge you for requesting access to your Personal Information but may charge you for our reasonable costs in supplying you with access to this information.
- (d) We will endeavour to respond to your request for access or correction within 30 days from your request.

## **9. Cookies policy**

- (a) Manage My Reno and its Authorised Affiliates may collect information by automated means when you access and use the Manage My Reno Platform by utilising features and technologies of your internet browser, including cookies and similar technologies. A cookie is a piece of data that enables us to track and target your preferences.
- (b) The type of information we and our Authorised Affiliates collect may include statistical information, details of your operating system, location, your internet protocol (IP) address, the date and time of your visit, the pages you have accessed, the links which you have clicked and the type of browser that you were using and browser and login authentication status.
- (c) We may use cookies and similar technologies to:
  - (i) enable us to identify you as a return user, make it easier for you to login to the Manage My Reno Platform and personalise and enhance your experience and use of the Manage My Reno Platform; and

- (ii) help us improve our Service to you when you access the Manage My Reno Platform and to ensure that the Manage My Reno Platform remain easy to use and navigate.
- (d) Most browsers are initially set up to accept cookies. However, you can reset your browser to refuse all cookies or warn you before accepting cookies.
- (e) If you reject our cookies or similar technologies, you may still use the Manage My Reno Platform but may only have limited functionality of the Manage My Reno Platform.
- (f) We may also use your IP address to analyse trends, administer the Manage My Reno Platform and other websites we operate, track traffic patterns and gather demographic information.

## **10. Privacy complaints**

- (a) If you have any issues about this Privacy Policy or the way Manage My Reno handles your Personal Information, please contact us using the details below and provide full details of your complaint and any supporting documentation.
- (b) At all times, privacy complaints:
  - (i) will be treated seriously;
  - (ii) will be dealt with promptly;
  - (iii) will be dealt with in a confidential manner; and
  - (iv) will not affect your existing obligations or your commercial arrangements with us.
- (c) Our Privacy Officer will endeavour to:
  - (i) respond to you within 10 business days; and
  - (v) investigate and attempt to resolve your concerns within 30 business days or any longer period necessary and notified to you by our Privacy Officer.
- (d) If you are dissatisfied with the outcome of your complaint, you may refer the complaint to Office of the Australian Information Commissioner.

## **11. How to contact us**

Manage My Reno can be contacted by email at [admin@managemyreno.co](mailto:admin@managemyreno.co).

## **12. Changes to this Privacy Policy**

- (a) From time to time, it may be necessary for us to review and revise our Privacy Policy. We may notify you about changes to this Privacy Policy by posting an updated version on the Manage My Reno Platform.
- (b) We encourage you to check the Manage My Reno Platform from time to time to ensure you are familiar with our latest Privacy Policy.