

Privacy Policy

V1.1 – Last updated 9 August 2022

This Privacy Policy describes how Connected Advantage Group Pty Ltd (ABN 97 659 088 383) (**we, our, us**) manages personal information about individuals whose data is collected and processed by:

- (a) us;
- (b) the EzyTrade platform at portal.ezytrade.com.au (the **Platform**); and
- (c) the Connected Advantage website at connectedadvantage.com.au (**Website**), (together, **EzyTrade**).

We are committed to complying with our privacy obligations in accordance with all applicable data protection laws, including the Australian Privacy Principles contained in Schedule 1 to the *Privacy Act 1988* (Cth) (each, an **APP**).

We may review our Privacy Policy periodically and reserve the right to change the Privacy Policy at any time at our discretion by posting such changes on the Website and Platform. Changes will be effected immediately when posted on the Website and Platform and your continued access, browsing or use of the Website and/or Platform thereafter will constitute your acceptance of those changes. Our policy is to be open and transparent about our privacy practices.

EzyTrade provides owners corporations (each, a **Customer**) with functionality that enables strata residents and owners (each, a **Resident**) to report issues relating to the common areas at an applicable site (each a **Reported Issue**), to the Customer (and/or its nominated building or strata manager). EzyTrade then links the Customer (and/or its nominated building or strata manager on its behalf) with approved building service providers (each, a **Service Provider**), which the Customer can engage via the Platform for the supply of building services to address a Reported Issue.

1 Consents

- 1.1 Our Customers and Service Providers are required to comply with all applicable privacy laws.
- 1.2 We rely on our Customers and Service Providers to obtain all relevant privacy consents and authorisations from their data subjects required by law, in order for the personal information that is provided to us and entered into the Platform to be collected, disclosed and otherwise processed by us.
- 1.3 We also rely on Customers and Service providers to ensure that all personal information about their data subjects held by us is accurate, up to date, complete, relevant and not misleading.
- 1.4 We encourage each of our Customers and Service Providers to ensure that data subjects are familiar with their privacy policies so that data subjects understand how they will collect, use and otherwise process personal information about them, via our Platform or otherwise.

2 The types of personal information that we collect and hold about data subjects

- 2.1 EzyTrade collects and holds the following types of personal information:
 - (a) **Content provided to us and/or entered into the Platform about data subjects:** All information, including personal information, that is provided to us or entered into the Platform (either by Residents, other end users or otherwise) is stored in systems managed by us. The types of personal information collected or held by us may include names and contact details, as well as any other personal information provided to us or entered into the Platform by, about or on behalf of, a data subject.
 - (b) **Information about Customer and Service Provider personnel:** We collect contact details of our Customers' and Service providers' personnel, such as names, contact information and billing information, including credit card details. Credit card details are not held by us, but are held by payment gateway providers that we use. Other than the last 4 digits of a credit card, all such credit card information is not accessible by us. For Customer personnel and Service Provider personnel who are data subjects, we also collect the information about them referred to in paragraph (a) that is provided to us or entered into the Platform.
 - (c) **Information required for the support, maintenance and security of EzyTrade:** In order to support and maintain the Platform and/or supply EzyTrade, we collect and process end user information including IP addresses, email and physical addresses, telephone numbers, user access logs, usernames, passwords, and information included by Customers, Service providers and Residents in technical support tickets and error messages.

3 How we collect personal information

- 3.1 Our policy is to not collect personal information by means that are unfair or unreasonably intrusive in the circumstances.
- 3.2 We collect information about prospective Customers and Service Providers from public and private databases and when they otherwise voluntarily disclose it to us or authorise us to collect it, in order for us to market, sell and operate EzyTrade.
- 3.3 After a prospective Customer enters into a contract with us for the supply of EzyTrade, we collect personal information about their data subjects in one or more of the following ways:

- (a) when end users enter personal information into the Platform that we host;
- (b) when a Customer provides personal information to us (for example, as part of the onboarding process for new Customers);
- (c) when it is provided to us by third parties on behalf of a Customer or pursuant to an agreement with a Customer for it to be entered into and/or processed by EzyTrade;
- (d) when it is transmitted to the Platform via an API or integration in accordance with an agreement that we enter into with a Customer or via a third party application; and
- (e) when it is voluntarily disclosed to us (such as via telephone, e-mail and online forms).

3.4 After a prospective Service Provider is approved as a Service Provider for EzyTrade, we collect personal information about their personnel in one or more of the following ways:

- (a) when end users enter personal information into the Platform that we host;
- (b) when a Service Provider provides personal information to us (for example, as part of the onboarding process for new Service Providers)
- (c) when it is provided to us by third parties on behalf of a Service Provider or pursuant to an agreement with a Service Provider, for it to be provided to us or entered into and/or processed by the Platform;
- (d) when it is transmitted to the Platform via an API or integration in accordance with an agreement that we enter into with a Service Provider or via a third party application; and
- (e) when it is voluntarily disclosed to us (such as via telephone, e-mail and online forms).

4 How we use personal information

4.1 How we use personal information about data subjects is set out in the following table:

Category	How we use and process that personal information	Our reason for collecting the personal information
Personal information about prospective Customers' personnel	<ul style="list-style-type: none"> • To inform, market and promote EzyTrade to prospective Customers and negotiate contracts with them. 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (in order to operate and grow our businesses).
Personal information about Customers' personnel	<ul style="list-style-type: none"> • To setup, configure, host or procure the hosting, of the Platform for a Customer and the use of the system by its end users. • To communicate with Customers about their current and prospective use of EzyTrade, including with respect to their current and anticipated usage of it, and to discuss and implement Customers' product and services requirements. • To provide Customers with technical support and maintenance services including by responding to help desk tickets, scheduling upgrades and enhancing EzyTrade. • To provide professional services to Customers (including training and other services). • To send out billing information and notices to Customers and process payments. • To discuss our security requirements. • To provide Customers with information about promotional offers and new products and solutions that we make available. • In order to identify Customers when contacted with technical support questions. • To administer our contractual relationships with Customers (and to 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (in order to operate, administer and grow our businesses including to operate EzyTrade, IT systems and networks, manage our suppliers and hosting environments and ensure the successful delivery of our products and services). • Performance and enforcement of contracts with our Customers. • Compliance with our legal obligations.

	enforce our contractual rights and their contractual obligations).	
Personal information about Customers' end users and other data subjects	<ul style="list-style-type: none"> As required to provide and support the functionality of EzyTrade for a Customer and to process the personal information of data subjects on behalf of a customer via the Platform. Where we host the Platform in the cloud or on our servers, we will collect all personal information entered into the Platform in order for us to do so and for the Platform to operate. Where we provide technical support, upgrades or maintenance of the Platform in the cloud or on our servers that we host, we may need to access the database on the server that will include the personal information of end users and other data subjects stored in the platform in order for us to provide such support, upgrades and maintenance services. To migrate data onto the Platform from other Customer systems (including legacy databases). To provide technical support services to our customers that require us to view and/or update data subject data held by us or in the Platform. Backing up and restoring data that includes data subject personal information. To carry out security audits, investigate security incidents and implement security processes and procedures that require access to data subject personal information. 	<ul style="list-style-type: none"> Performance of our contracts with a Customer. Necessary for our legitimate interests (in order to administer our businesses including to allow our customers to operate the Platform, and to enable us to operate our IT systems and networks, manage our hosting environments and ensure the successful delivery of our services). To comply with our legal and statutory obligations.
Personal information about prospective Service Providers' personnel	<ul style="list-style-type: none"> To inform, market and promote EzyTrade to prospective Service Providers and to onboard them. 	<ul style="list-style-type: none"> Necessary for our legitimate interests (in order to operate and grow our businesses).
Personal information about Service Providers' personnel	<ul style="list-style-type: none"> To onboard a new Service Provider and configure the use of the system by its end users. To communicate with Service providers about their current and prospective use of EzyTrade, including with respect to their current and anticipated usage of it, and to discuss and implement Service Provider's services requirements. To provide Service Providers with technical support and maintenance services. To send out billing information and notices to Service Providers and process payments. To discuss our security requirements. To provide Service Providers with information about promotional offers and new products and solutions that we make available. In order to identify Service Providers when contacted with technical support questions. 	<ul style="list-style-type: none"> Necessary for our legitimate interests (in order to operate, administer and grow our businesses including to operate EzyTrade, IT systems and networks, manage our suppliers and hosting environments and ensure the successful delivery of our products and services). Performance and enforcement of contracts with our Customers. Compliance with our legal obligations.

5 How we hold and secure personal information

5.1 We hold and store personal information that we collect in our offices, computer systems and third party owned and operated hosting facilities.

5.2 We take reasonable steps to protect personal information that we hold using such security safeguards as are reasonable in the circumstances to protect against loss, unauthorised access, modification and disclosure and other misuse, and we implement technical and organisational measures to ensure a level of protection appropriate to the risk of accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal information transmitted, stored or otherwise processed by us.

5.3 We:

- (a) only use reputable cloud hosting providers to host personal information;
- (b) implement passwords and access control procedures, anti-virus, firewall and security controls for email and other applicable computer software and systems;
- (c) maintain files, in both hardcopy and electronic form, at our offices and other access-controlled premises;
- (d) operate online records managements systems on secure networks;
- (e) regularly perform security testing;
- (f) maintain physical security measures in our buildings and offices such as visitor access management, cabinet locks, surveillance systems and alarms to ensure the security of information systems (electronic or otherwise);
- (g) require our employees, agents and contractors to comply with the privacy and confidentiality provisions in their employment and subcontractor agreements that we enter into with them;
- (h) use SSL encryption on our systems;
- (i) have data backup archiving and disaster recovery processes in place;
- (j) if appropriate in the circumstances taking into account the state of the art, the costs of implementation and the nature, scope, content and purpose of the processing, we will encrypt personal information; and
- (k) with respect to personal information that we no longer require or where we are otherwise required to destroy it under applicable law, we ensure that such personal information is securely destroyed.

6 Disclosure of personal information

6.1 We will disclose personal information to our employees, officers, advisors, suppliers, agents and/or related entities who assist us in the performance of our services. We ensure that they are aware of their information security responsibilities, are appropriately trained to meet those responsibilities and have entered into agreements which require them to comply with privacy and confidentiality obligations which apply to personal information that we provide to them.

6.2 We only disclose personal information that we collect to third parties as follows:

- (a) where required under a contract with a Customer, we will transmit data subject personal information to third party applications on behalf of the Customer;
- (b) in order to host databases that are integrated into the EzyTrade, we engage reputable hosting providers who host those databases on our behalf;
- (c) when performing contracts we may outsource certain obligations to third party contractors in accordance with our contractual rights (such as hosting, software development and other professional services). Professional services carried out by them may require access to data subject personal information;
- (d) when providing information to our legal, accounting or financial advisors/representatives or insurers, or to our debt collectors for debt collection purposes or when we need to obtain their advice, or where we require their representation in relation to a legal dispute;
- (e) where a person provides written consent to the disclosure of personal information about them;
- (f) where it is brought to our attention that specific personal information needs to be disclosed to protect the safety or vital interests of any person;
- (g) to avoid prejudice to the maintenance of the law by any public sector agency, including the prevention, detection, investigation, prosecution, and punishment of offences;
- (h) for the enforcement of a law imposing a pecuniary penalty;
- (i) for the protection of public revenue;
- (j) for the conduct of proceedings before any court or tribunal (being proceedings that have been commenced or are reasonably in contemplation); or
- (k) where required by law.

7 Third party products and websites

- 7.1 The Platform may include links to third party websites or applications and integrations with third party products and services. Our linking to those websites or applications does not mean that we endorse or recommend them. We do not warrant or represent that any third party complies with applicable data protection laws. Customers, Service Providers and data subjects should consider the privacy policies of any relevant third party prior to sending personal information to them.

8 Interacting with us without disclosing personal information

- 8.1 If you do not provide us with your personal information, you can only have limited interaction with us. For example, you can browse our Website without providing us with personal information, such as the pages that generally describe EzyTrade that we make available, and our Contact Us page. However, when you submit a form on our Website or become a Customer or Service Provider, or if you are a Resident, we need to collect personal information from you in order to identify who you are, so that we can operate EzyTrade, and for the other purposes described in this Privacy Policy.
- 8.2 You have the option of not identifying yourself or using a pseudonym when contacting us to enquire about EzyTrade but not if you wish to actually use EzyTrade or any part thereof. It is not practical for us to provide you with access and/or use of EzyTrade or any part thereof if you refuse to provide us with personal information.

9 Offshore disclosure

- 9.1 We may transfer personal information to our contractors and service providers who assist us with the supply and provision of EzyTrade, and to assist us with the operation of our business generally, where we consider it necessary for them to provide that assistance. We will take reasonable steps to ensure that such recipients do not breach the APPs in relation to personal information or other relevant State and Territory laws (as applicable). At present we transfer your personal information to our interstate contractors and service providers within Australia. We do not currently use offshore contractors or service providers.

10 How to access and correct personal information held by us

- 10.1 Customers, Service Providers their respective personnel who wish to access and correct the personal information held by us about them should contact us.
- 10.2 Prior to contacting us or submitting a request for access to correct any personal information held about them, Customers and their personnel can update the personal information about them by logging into their account on the Platform, where such functionality is available. However, we encourage you to contact us in any event and we would be happy to assist you.
- 10.3 Residents who wish to access and correct the personal information held by us about them should in the first instance contact the applicable Customer ie their Owners Corporation.
- 10.4 All other data subjects who wish to access and correct the personal information held by us about them should contact us.
- 10.5 It is our policy to retain personal information in a form which permits identification of any person only as long as is necessary for the purposes for which the personal information was collected; and for any other related, directly related or compatible purposes if and where permitted by applicable law. We will only process personal information that you provide to us for the minimum length of time permitted by applicable law and only thereafter for the purposes of deleting or returning that personal information to you (except where we also need to retain the data in order to comply with our legal obligations, or to retain the data to protect your or any other person's vital interests).
- 10.6 In addition to clause 10.5, we retain personal information in connection with EzyTrade as follows:
- (a) Personal information about a Customer and its personnel will be held while the Customer is our customer and thereafter for a period of 5 years for tax purposes;
 - (b) Personal information about a Service Provider and its personnel will be held while the Service Provider is our approved service provider and thereafter for a period of 5 years for tax purposes;
 - (c) Personal information about a Resident will be held while the Resident is a resident or owner of a unit, townhouse or other premises comprising part of the strata operated by a Customer and thereafter for a period of 12 months, at which time it will be automatically deleted;
 - (d) Any other end user's personal information will be held while the end user is an active user of EzyTrade or any component thereof and thereafter for a period of 12 months, at which time it will be automatically deleted; and
 - (e) We will only keep personal information for longer periods than specified above, where required under applicable law.
- 10.7 As an alternative to deleting personal information, we may elect to de-identify it where permissible by law. We will de-identify certain types of personal information for the purpose of improving EzyTrade and for provision to third parties for marketing and research purposes.

10.8 Where you require personal information to be returned, it will be returned to you at that time, and we will thereafter delete all then remaining existing copies of that personal information in our possession or control as soon as reasonably practicable thereafter, unless applicable law requires us to retain the personal information, in which case we will notify you of that requirement and only use such retained data for the purposes of complying with those applicable laws.

10.9 We will handle all requests for access to personal information in accordance with our statutory obligations. You can request to receive a copy of your personal information by emailing privacyofficer@connectedadvantage.com.au. We may require payment of a reasonable fee by any person who requires access to their personal information that we hold, except where such a fee would be contrary to applicable law. We will not charge you for the making of any such request. We will endeavour to provide a response to any request for access to personal information within 72 hours from the time a request is made.

11 Our contact details

11.1 Any person who wishes to contact us for any reason regarding our privacy practices or the personal information that we hold about them, or make a privacy complaint, may contact us as follows:

Contact: Privacy Representative
Email: privacyofficer@connectedadvantage.com.au
Post: Level 5, 20 Bond Street, Sydney 2000
Telephone: 1300 823 868

11.2 We endeavour to resolve any privacy complaint with the complainant within a reasonable time frame given the circumstances. This may include working with the complainant on a collaborative basis or otherwise resolving the complaint.

11.3 If the complainant is not satisfied with the outcome of a complaint or they wish to make a complaint about a breach of the Australian Privacy Principles, they may refer the complaint to the Office of the Australian Information Commissioner who can be contacted using the following details:

Telephone: 1300 363 992
Email: enquiries@oaic.gov.au
Address: GPO Box 5218, Sydney NSW 2001