

## WEBSITE PRIVACY POLICY

This Privacy Policy applies to all personal information collected by Setli Pty Ltd (**we, us or our**) via the website located at [www.setli.com.au](http://www.setli.com.au) (**Website**).

### 1. What information do we collect?

The kind of Personal Information that we collect from you will depend on how you use the website. The Personal Information which we collect and hold about you may include:

We collect personal information from users of the Setli platform in order to provide our services. This may include: • Full name • Email address • Phone number • Postal or residential address • Account login details and user profile information • Payment and billing information (payments are processed securely through Stripe and Setli does not store credit card details) • Transaction records related to rent payments and platform fees • Property listing information provided by landlords • Tenant and landlord account activity within the platform • IP address, device information, and browser type • Website usage data, analytics information, and cookies • Communication records from customer support enquiries or contact forms • Any other information voluntarily provided when registering an account or interacting with the platform

### 2. Types of information

The Privacy Act 1988 (Cth) (Privacy Act) defines types of information, including Personal Information and Sensitive Information.

**Personal Information** means information or an opinion about an identified individual or an individual who is reasonably identifiable:

- (a) whether the information or opinion is true or not; and
- (b) whether the information or opinion is recorded in a material form or not.

If the information does not disclose your identity or enable your identity to be ascertained, it will in most cases not be classified as “Personal Information” and will not be subject to this privacy policy.

**Sensitive Information** is defined in the Privacy Act as including information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive Information will be used by us only:

- (a) for the primary purpose for which it was obtained;
- (b) for a secondary purpose that is directly related to the primary purpose; and
- (c) with your consent or where required or authorised by law.

### **3. How we collect your Personal Information**

- (a) We may collect Personal Information from you whenever you input such information into the Website, related app or provide it to Us in any other way.
- (b) We may also collect cookies from your computer which enable us to tell when you use the Website and also to help customise your Website experience. As a general rule, however, it is not possible to identify you personally from our use of cookies.
- (c) Before deploying non-essential cookies (including analytics, marketing, or social media cookies), we will obtain your explicit consent through a cookie consent mechanism. You may manage your cookie preferences, opt-out of non-essential cookies, or withdraw consent at any time through your browser settings or our cookie management tool. Essential cookies required for Website functionality may be used without consent.
- (d) We generally don't collect Sensitive Information, but when we do, we will comply with the preceding paragraph.
- (e) Where reasonable and practicable we collect your Personal Information from you only. However, sometimes we may be given information from a third party, in cases like this we will take steps to make you aware of the information that was provided by a third party.
- (f) We may share your Personal Information with third-party service providers including payment processors, cloud hosting providers, analytics platforms, communication service providers and other technology providers that assist us in operating the Website and providing our services.

### **4. Purpose of collection**

- (a) We collect Personal Information to provide you with the best service experience possible on the Website and keep in touch with you about developments in our business.
- (b) We customarily only disclose Personal Information to our service providers who assist us in operating the Website. Your Personal Information may also be exposed from time to time to maintenance and support personnel acting in the normal course of their duties.
- (c) We require all service providers who handle Personal Information to enter into written Data Processing Agreements that mandate compliance with the Privacy Act 1988 (Cth), implement equivalent security measures, restrict data use to specified purposes only, and provide us with audit rights. We remain accountable to you for any breaches by our service providers and require them to notify us immediately of any data security incidents.
- (d) By using our Website, you consent to the receipt of direct marketing material. We will only use your Personal Information for this purpose if we have collected such information direct

from you, and if it is material of a type which you would reasonably expect to receive from use. We do not use sensitive Personal Information in direct marketing activity. Our direct marketing material will include a simple means by which you can request not to receive further communications of this nature, such as an unsubscribe button link.

## **5. Security, Access and correction**

- (a) We store your Personal Information in a way that reasonably protects it from unauthorised access, misuse, modification or disclosure. When we no longer require your Personal Information for the purpose for which we obtained it, we will take reasonable steps to destroy and anonymise or de-identify it. Most of the Personal Information that is stored in our client files and records will be kept for a maximum of 7 years to fulfill our record keeping obligations.
- (b) We implement security measures including encryption of Personal Information during transmission and storage, role-based access controls for authorised personnel, and regular security audits. In the event of a data breach that is likely to result in serious harm, we will notify affected individuals and the Office of the Australian Information Commissioner as soon as practicable in accordance with the Notifiable Data Breaches scheme under the Privacy Act 1988 (Cth).
- (c) The Australian Privacy Principles:
  - (i) permit you to obtain access to the Personal Information we hold about you in certain circumstances (Australian Privacy Principle 12); and
  - (ii) allow you to correct inaccurate Personal Information subject to certain exceptions (Australian Privacy Principle 13).
- (d) Where you would like to obtain such access, please contact us in writing on the contact details set out at the bottom of this privacy policy.

## **6. Complaint procedure**

If you have a complaint concerning the manner in which we maintain the privacy of your Personal Information, please contact us as on the contact details set out at the bottom of this policy. All complaints will be considered by Privacy Officer and we may seek further information from you to clarify your concerns. If we agree that your complaint is well founded, we will, in consultation with you, take appropriate steps to rectify the problem. If you remain dissatisfied with the outcome, you may refer the matter to the Office of the Australian Information Commissioner.

## **7. Overseas transfer**

Your Personal Information may be transferred to recipients located outside Australia, including the United States and other jurisdictions where our service providers operate (such as cloud hosting providers and payment processors). Where we transfer Personal Information overseas, we take

reasonable steps to ensure that the recipient handles the information in accordance with the Australian Privacy Principles or provides comparable protections.

## **8. GDPR**

In some circumstances, the European Union General Data Protection Regulation (GDPR) provides additional protection to individuals located in Europe. The fact that you may be located in Europe does not, however, on its own entitle you to protection under the GDPR. Our website does not specifically target customers located in the European Union and we do not monitor the behaviour of individuals in the European Union, and accordingly the GDPR does not apply.

## **9. How to contact us about privacy**

If you have any queries, or if you seek access to your Personal Information, or if you have a complaint about our privacy practices, you can contact us through:

Privacy Officer

Setli Pty Ltd

Email: [contact@setli.com.au](mailto:contact@setli.com.au)

Website: [www.setli.com.au](http://www.setli.com.au)

## **10. Transfer Safeguards**

Where we transfer your Personal Information overseas, we will take reasonable steps to ensure the overseas recipient handles your information in accordance with the Australian Privacy Principles, including by entering into contractual arrangements that require the recipient to protect your information to a standard comparable to that required under Australian privacy law.