

APAX – PRIVACY POLICY

APAX.com.au Pty Ltd (ACN 620 124 334) trading as APAX (ABN) (**we, our, us**) are bound by the Australian Privacy Principles set out in the *Privacy Act 1988* (Cth) (**Act**). Unless otherwise indicated, words in this Privacy Policy have the same meaning as the APAX Terms and Conditions of Use (as published on the Website at www.apax.com.au/websitetermsandconditions from time to time).

About the information we hold

To best assist you in accessing our services, we may collect, hold and use records about you including your name, ABN, telephone number, email address, residential or business address, nationality, transaction history, banking/payment details, credit information and/or other contact information. We will only collect personal information about you where we consider it necessary for one or more of the activities or functions that we undertake in connection with providing and offering our services to you, or for any other purpose consented to by you or authorised by law.

Collection of personal information

When you access or use our Website and Services, you may be asked to provide certain personal information including the following:

- identification information (for example, name, date of birth, ABN, residential address, business address, photograph of your face) and including copies of documents that evidence that information such as your driver's licence and passport);
- your gender, age, occupation, ethnicity, interests; and
- financial information (for example, property purchasing history, salary, assets or other relevant information that may be required by any relevant financial service provider); and

When you access or use our Website we will also collect information that is sent to us by your computer, mobile device or other electronic access device. The information that is sent to us may include (without limitation): computer IP address; referral URL; geo-location; data about the web-pages you access; and statistics on page views and other information.

We may also collect information about you from other sources, these may include:

- credit report service providers;
- identity verification service providers; and
- real estate agents or other persons/entities involved with or facilitating any part of the delivery of our Services or any other services related to the Website.

Wherever possible, we will collect personal information from you personally, or from your appointed and authorised real estate agent on your behalf. If we collect information about you from third parties (as contemplated above, for example) we will tell you (or your appointed and authorised real estate agent acting as your agent) the type of information collected, from whom it was collected, the reason for collecting the information and whether the information is to be disclosed to any third parties.

How we use information

We collect and hold your personal information to ensure that we are able to offer you the best possible service. In particular, the collection of your personal information will help us to (as applicable):

- provide you with access to our Website and our Services, including:
 - your registration as a User, including creating and administering your User Account on the Website;
 - facilitating your participation in an Auction on the Website;
 - verification of your identity;

- the provision of customer support;
 - detection, management, enforcement and prevention of any violation of our Terms of Use or other agreement between you and APAX or an Auctioneer, and to ensure and/or facilitate compliance with any law, industry rules or regulations;
 - credit assessment or debt recovery purposes; and
 - the performance of any Services you request from APAX.
- keep you informed about our Services and about any Auction or Property, including:
 - updates, news or changes to our Website or Services;
 - issues regarding your User Account(s) and the Services you receive from us; and
 - in relation to any Auction or Property that you have requested updates for, notifications about that Auction or Property.
 - contact you (or arrange for third parties to contact you) for marketing and research purposes, including:
 - to request your participation in marketing research and surveys; and
 - to promote and market our services, or any property to you,
 (unless you inform us that you do not want to be contacted for this purpose);
 - gather, monitor, create, share and publish information about trends and behaviours relevant to the real estate industry, APAX Website and to our Services; and
 - undertake any other use or purpose notified to you at the time of collection of your personal information.

We will not use your personal information for any other purpose without your consent. However, we reserve the right to use or disclose your information where required or permitted by Australian law or court order.

If you do not provide us with certain personal information, then we may be unable to offer products and Services to you.

Information we collect may be disclosed to entities within the APAX group, to Auctioneers and other third parties that we engage to assist in the delivery of our products and Services. We may also disclose personal information about you to real estate agents, Vendors and Bidders to the extent necessary to facilitate the conduct of an Auction.

Sensitive information

We will generally not seek to collect sensitive information about you unless the collection is required by law or a permitted situation exists where it is necessary to collect such information. Unless otherwise permitted or required by law, we would seek your consent to the collection of sensitive information.

Storage, protection and security of information

We take all reasonable measures to ensure that your personal information is stored in a safe and secure environment, including in respect of electronic and hard copies of information. We do not routinely disclose your personal information to any other person or organisation unless we have obtained your consent to do so or are required or permitted to do so by law.

Third party service providers may hold or process data off-shore. Where personal information is transferred or disclosed overseas, we will take reasonable steps to ensure that the information transferred or disclosed is handled in accordance with the Australian Privacy Principles. We will also use all reasonable efforts to ensure that the information that it has transferred will not be held, inappropriately used or disclosed by the recipient of the information.

Any personal information held by us will be destroyed or permanently de-identified when it is no longer needed for any purpose for which we might legitimately use or disclose it and it is no longer required to be held by us as a matter of law.

How you can gain access or correct information

We take all reasonable steps to ensure that any personal information that we hold about you is accurate, complete and up-to-date. You can contact us to request access to personal information that we may hold about you, seek correction to that personal information or make a complaint about a breach of the Australian Privacy Principles.

Such requests or complaints should be made in writing and addressed to our privacy officer, the contact details of whom are set out below. Our privacy officer will establish the identity of an individual before dealing with their request or complaint and may therefore ask questions that relate to the personal information held.

A response to all requests or complaints will be provided as soon as is reasonably practicable and generally within ninety (90) days of receipt. A fee may apply to enable us to recover the reasonable costs of making personal information available to you.

If you believe that the personal information we hold about you is not accurate, complete or up-to-date we will take reasonable steps to make any necessary corrections.

If your concerns are not resolved to your satisfaction or you would like further information in regard to the Act, you may contact the Office of the Australian Information Commissioner on 1300 363 992.

Variation and consent to variation

We may, at any time, vary the terms of this privacy policy. We recommend that you check this privacy policy regularly so that you are aware of any variations made to this privacy policy. An up-to-date version of our privacy policy is available on the Website.

Contacting us

Should you require further information about our privacy policy, wish to make a request or complaint, or would like to opt out of receiving certain communications or information, you may contact:

The Privacy Officer
APAX
Level 1, 39-41 Mount Street, Prahran VIC 3181
Email: patrick@apax.com.au
Phone: +61418818976