

Privacy Policy

Our commitment

Privacy matters to us, and we know it matters to you. We are committed to protecting your privacy, keeping your personal information safe, maintaining the security of your data, and complying with the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) (“**Privacy Act**”).

Our Privacy Statement

This policy applies to Local: Residential Pty Ltd, Local: Residential Services Pty Ltd, Local: Management Pty Ltd and any related entities (“**Local**”, “**we**” or “**us**”).

This policy outlines how we collect, hold, manage and otherwise use your personal information.

What is personal information, and what do we collect?

What is personal information? The Privacy Act defines personal information to mean ‘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 whether the information or opinion is recorded in a material form or not’. Personal information can include a person’s name, residential address, email address, phone number, financial details or employment details.

We collect different types of personal information from you. It’s information we need to be able to communicate with you about things you’re interested in. Additionally, we collect and may hold your personal information for the purpose of assessing your rental application and any ongoing residential rental agreement. Any information is only collected and retained to enable us to keep you informed of our marketing and services, to make an assessment of your residential rental agreement, as required as part of your ongoing residential rental agreement with us, so we comply with any regulatory or legal requirements or as agreed.

The main types of information we collect

The main types of information we collect from you include but are not limited to:

- **identity information** – to make sure you are who you say you are, we’ll collect information like your name, date of birth, contact details and proof of identity documents;
- **financial and rental history information** – if you’re applying to live with us, we’ll also collect your employment, financial, credit and residential history, like your employment and



income details, payment and credit history, rental references and, if your application is successful, your payment details (to enable us to be paid rent); and

- **CCTV and written reports** – this is information we collect within our buildings, like CCTV or written reports. This information helps us protect our staff, residents and visitors and is important for preventing fraud, crime and misconduct.

As a general rule, we only gather personal information such as first and last names, addresses, telephone numbers and email addresses, when voluntarily submitted by you. For example, personal information may be collected from you in order to get your feedback on our websites and our services. In other instances, personal information may be collected from you in order to respond to your enquiries.

Sensitive personal information

We will only collect your sensitive information if it's relevant to the products or services we provide you and if allowed by law.

In Australia, sensitive information is specifically defined in the Privacy Act, and covers things like biometric, ethnic origin and health information. For example, we may need to collect biometric information to verify your identity or detect fraud.

We'll always ask for your consent before we collect and use your sensitive information. The only exceptions are when we're permitted to collect and use that information or when we're legally able to do so.

How do we collect your personal information?

There are two main ways we collect your personal information:

1. You give it to us

This might happen during any interaction you have with us where you might give us information about yourself, for example, when you set up an account, fill out a form on our website, chat with us online or over the phone, or contact us with a question or complaint.

2. We collect it ourselves

This is information we collect about you when you interact with us in some way. We might do this when you visit our website (including via cookies and other technologies) or use our products and services, or when you share your information with one of our third-party providers.

Any information we collect will be held in accordance with this privacy policy, and as required by law.

Collection from third parties

As mentioned, we may receive and collect some of your personal information where it is shared by you to one of our third-party providers (ie via your interest in our marketing and communication material, your interest in our products or services, as part of your assessment for a residential rental agreement with us or as part of your ongoing residential rental agreement). Some examples include:



- When completing the necessary checks to confirm that the details and information you provided are correct, a third-party provider may assist us with this process. Our third-party provider is focused on ensuring that any information provided by you during this process is securely stored and protected;
- when you become a renter with us, you will have access to our Resident App. This App is used for everything – from gaining access to your building and apartment to booking maintenance checks and bookable areas and communicating with us. Any personal information provided on our App will be shared with our third-party provider who assists us with our residential App;
- if you sign up for internet services as part of your residential rental agreement, your personal information will be collected and used by a third-party internet provider; and
- for payment of rent, we use a third-party provider that securely processes and stores payment data from our renters. Upon collection, payment details are converted into tokens, ensuring that no actual card or account information is stored or accessible;

Where we collect information from third parties, we take reasonable steps to ensure you are aware of this.

Don't want to share your information? We get it

Personal information is about you and, in some situations, you might not want to provide us with particular details. If that's the case, keep in mind that we may not be able to provide you with our products or services.

How do we use your personal information?

We use your personal information in a variety of ways. Some examples include:

- **to provide products and services to you** – we may use your personal information to provide products and services to you and conduct our business;
- **administration** – this includes many of the ordinary activities necessary to run our business. We may use your personal information to help us manage the services we provide to you, deal with enquiries and complaints and to maintain and update our records. For example, if you contact us with a question about your residential rental agreement, we'll need to verify your identity first to protect against fraud and will use your personal information to do that. Further, we will also use your information for charging and billing and to identify breaches of your residential rental agreement;
- **identifying fraud, crime and misconduct** – we may use your personal information to identify and help prevent identity theft, unauthorised access or other fraudulent activities at our sites. Personal information captured within our premises, including via CCTV, may also be used to manage fraud, crime, and misconduct;
- **communicating with you** – businesses need to be able to communicate with their customers, and we're no different. We may use phone, email, SMS, chat functions and



social media to communicate with you. We may also provide you with personalised experiences within search engines and web pages you visit;

- **improve our experience offering** – we are continually working to maintain and improve our resident experience and to develop new ones, and we may use your personal information to help us do this. For example, other information we collect extends to information about how you use the spaces you have access to. Information like if you access the gym or amenities spaces. This isn't to monitor your movements, but to gather behavioural data that help us make sure our buildings include the amenities that people use the most and re-purpose areas that could be used to create a better experience. This information is generally aggregated or de-identified when we analyse it, which means the information isn't personal information. We may share these insights with trusted partners;
- **direct marketing** – we want to make sure you hear about products, services or special offers from us that you might find useful or interesting. We may use the personal information we collect and hold about you to market and promote products, services and special offers directly to you. Additionally, we may also contact you with information about products, services and offers our very cool partners provide. You will always have the chance to opt out of non-rental-related communications; and
- **assessment of your residential rental agreement** – if you are interested in renting with us, your personal information will be collected and used to enable us to consider and assess your eligibility for a residential rental agreement with us.

Other

We may give access to your personal information to other external parties. Examples include:

- our professional advisors (ie lawyers, accountants, third-party lenders, insurers or other professional consultants etc);
- Australian Securities Investments Commissions, or to other government agencies, courts;
- to our financial institutions, our investors or joint venture partners; or
- as required by law.

Disclosure of your personal information to external parties will be limited, where possible, and only to where that third-party requires the disclosed information to perform their services to us or where required by law.

And, rest assured, we will never sell your personal information to third parties.

You have the right to opt out of marketing communication from us

If you don't want your personal information to be used for marketing, you can simply opt-out via the method provided in the communication or by contacting us at hello@localresidential.com.au



Any personal information we collect and hold in connection with your residential rental agreement that is no longer needed for the purpose it was obtained, we will take reasonable steps to destroy or permanently de-identify your personal information as soon as is reasonably possible or as required by law.

How we keep your information safe

We take all reasonable steps to ensure the security and protection of your personal information. Access is restricted to those involved in the administration or fulfilment of the enquiry entered or of any request for which you have provided your personal information.

We also limit the amount of information we keep, and we aim to ensure that any personal information is kept as current as possible, and that irrelevant or excessive data is destroyed or de-identified as soon as reasonably possible or as required by law.

Further, to safeguard the personal information provided by renters, we, and our third-party provider who assists us with keeping your information safe, adhere to ISO 27001 standards and implement rigorous network security and management processes. The cloud-based tech stack that we use is fortified with robust encryption protocols, ensuring data confidentiality during transmission and storage. Access controls are strictly enforced, employing multi-factor authentication and role-based permissions to limit data access to authorised personnel only. Regular security audits and vulnerability assessments are also conducted to identify and mitigate potential risks promptly. Additionally, continuous monitoring and logging mechanisms enable real-time detection of unauthorised access or anomalies. We maintain a comprehensive incident response plan to swiftly address any security breaches, ensuring minimal impact on renter data. By adhering to ISO 27001 standards and implementing these measures, we prioritise the protection of renter information across our cloud-based infrastructure.

Links To Other Sites

We may offer links to sites that are operated by other businesses. If you visit one of these linked sites, you should review their privacy and other policies. We are not responsible for the policies and practices of other businesses.

Changes and access to your personal information

It is an important to us that your personal information is up-to-date. We will take reasonable steps to make sure that your personal information is accurate and complete. If you find that the information we have is inaccurate, please advise us as soon as practicable so we can update our records in order to continue to provide quality services and products to you.

You may want to access your personal information. If you wish to do so, please notify us in writing. In order to protect your personal information, we may require identification from you before releasing your requested information.

Changes To Our Privacy Policy

From time to time, we may need to change this privacy policy, so we suggest you check here periodically. Rest assured, however, that any changes will not be retroactively applied and will not



alter how we handle previously collected information.

Need to reach us?

Your privacy matters to us. If you need to reach us to update your details, chat about how we manage your personal information or would like a copy of this Privacy Statement sent to you, please email hello@localresidential.com.au.