



# PRIVACY POLICY

## PURPOSE;

To describe when Proppy collects personal information, what it is used for, to whom it is disclosed, and to ensure that Proppy complies with its obligations under the Privacy Act 2020.

## POLICY:

This policy covers the following topics;

1. The information Proppy collects and when
2. How Proppy uses the information
3. Sharing of information
4. Storage and protection of personal information
5. Accessing and correction of personal information
6. Internet use
7. Security of captured data
8. Changes to the privacy policy

### 1. The information Proppy collects and when.

Proppy collects personal information from buyers and vendors (Users) who use Proppy's Website.

Additional personal information is collected by Proppy from third parties in relation to identity verification, financial credit checks, Company Office checks, online checks (through search engines), and background and legal checks as deemed appropriate.

### 2. How Proppy uses this information.

The personal information collected is used:

- to check user identities to satisfy Proppy's obligations under Fraud & Anti Money Laundering and Fair Dealing legislation and obligations;
- to facilitate approval and listing of property on the Website;
- to assist in the preparation and issue of Contractual Documentation;
- to carry out any activity in connection with any legal, governmental or regulatory requirement, or in connection with legal proceedings, crime or fraud prevention, detection or prosecution; and
- for general administrative and business purposes.

### 3. Sharing of information.

Proppy will only publish generic information about property on the public pages of its Website. Proppy will under no circumstances, sell or receive payment for licencing or disclosing personal information held.

More detailed information about Users and property will only be disclosed to:

- Registered Buyers;
- Credit reference agencies (unless we have agreed otherwise) who may share the information with other organisations and who may keep a record of the searches made against the borrowers name;
- Anyone who hosts or maintains data centers, service platforms and other infrastructure and systems where information is processed or stored on behalf of Proppy;
- Any person or organisation Proppy may be required to pass information onto by reason of legal, governmental or regulatory authority including law enforcement agencies;
- Any person or organisation as authorised by the Privacy Act 2020; and
- Any person as necessary to protect or enforce Proppy's legal rights and interests, or to defend any claims made against it.

### 4. Storage and protection of personal information

Where Proppy stores or records personal information, all reasonable steps will be taken to keep such information:

- secure and to prevent unauthorised disclosure, and
- accurate and up to date.

### 5. Access and correction of personal information

- Every User of the Website will have online access to their personal registration information and may change such information themselves or request correction of the details held by contacting Proppy (such amendments may need to be validated by Proppy).
- Proppy will take all reasonable steps to correct its information so that it is accurate, complete and current.
- Proppy will delete any personal information when it is no longer required for the purpose for which it was collected.

### 6. Internet Use

Cookies are small pieces of information which can be stored on a hard drive (persistent cookies) or in memory (session cookies). Proppy cookies stored to a user's computer cannot read the hard drive or command the computer to perform any action.

### 7. Security of captured data

To prevent unauthorised access, maintain data integrity and ensure appropriate use of any customer information collected, Proppy will put in place physical, electronic and managerial processes to protect the information collected.

- Proppy's system will store data in an encryption protected environment;

- Proppy will contract an independent internet security specialist to conduct regular vulnerability and penetration testing; and
- Proppy will regularly review all aspects of data security in respect of the advice received from the security specialists.

#### 8. Changes to Proppy Privacy Policy

Any changes to this policy will be advertised on the Proppy Website and be effective from the date posted on the Website