

## PRIVACY POLICY

Last Updated 30/12/2025

Mobble Pty Ltd ACN 629 891 756 of 890 Lambing Gully Road, Avenel VIC 3664 (**“Mobble”**, **“we”**, **“our”** and **“us”**) is committed to providing quality services to you (**“User”**, **“you”**, **“your”**) and this privacy policy (**“Policy”**) outlines our ongoing obligations to you in respect of how we manage your personal information (**“Personal Information”**). It applies to Users globally, including those in Australia, the United States of America (**“U.S.”** or **“U.S.A.”**) and Canada. In Australia, we comply with the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth). For Users in the U.S., we comply with applicable state privacy laws, including the California Consumer Privacy Act (**“CCPA”**) and California Privacy Rights Act (**“CPRA”**). For Canadian users, we comply with the Personal Information Protection and Electronic Documents Act (**“PIPEDA”**) and relevant provincial privacy laws. This Policy also incorporates requirements for cross-border data transfers and user rights under applicable international data protection regulations, including the General Data Protection Regulation (**“GDPR”**) where applicable.

Together, these frameworks are referred to as the **'applicable privacy laws'**, and this Policy is intended to comply with the relevant laws as and when they apply, depending on your jurisdiction and the nature of the Personal Information being collected, used, disclosed or protected.

### 1. What is Personal Information and why do we collect it?

1.1 **“Personal Information”** (also referred to as **“Personal Data”** in some jurisdictions) means information or an opinion about an identified individual or an individual who is reasonably identifiable, whether the information is true or not and whether it is recorded in a material form or not. This may include names, addresses, email addresses, telephone numbers, account information, location data, or online identifiers.

1.2 We collect Personal Information for the primary purpose of:

- a) providing, improving, and managing our products and services;
- b) facilitating customer support;
- c) sending updates, marketing communications, and service announcements (where permitted); and
- d) fulfilling our legal and contractual obligations.

1.3 We collect this information directly from you via:

- a) forms and communications through our website ([www.mobble.io](http://www.mobble.io));
- b) email, phone, or written correspondence;
- c) third-party platforms or integrations you use with our services; and
- d) automatically through cookies and analytics tools

1.4 Where required by applicable privacy law:

- a) we rely on specific legal bases to process your data, including your consent, performance of a contract, legal obligation or our legitimate interests;
- b) you may opt out of marketing communications at any time by clicking the “unsubscribe” link or contacting us directly; and
- c) we will inform you at or before the point of collection why we are collecting the information and how it will be used.

## 2. Sensitive Information

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- 2.1 Sensitive information refers to categories of personal data that are subject to enhanced protections under applicable privacy and data protection laws.
- 2.2 Under the Privacy Act 1988 (Cth), “**Sensitive Information**” includes information or an opinion about an individual’s racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union or professional memberships, criminal record, or health or biometric information.
- 2.3 Under the CPRA, “**Sensitive Personal Information**” includes government-issued identifiers (e.g. social security or driver's licence numbers), financial account credentials, precise geolocation, racial or ethnic origin, religious beliefs, union membership, contents of certain communications, genetic or biometric data, and health or sex life information.
- 2.4 While the PIPEDA does not formally define "sensitive information," it is interpreted contextually. The Office of the Privacy Commissioner of Canada (“**OPC**”) considers sensitivity to be context-dependent and has issued guidance that information such as health records, financial details, biometric data, or social insurance numbers will generally be considered sensitive. As a result, higher standards of protection and express consent are typically required for the collection, use or disclosure of such information.
- 2.5 Under the GDPR, “**Special Categories of Personal Data**” include data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data processed to uniquely identify a person, data concerning health, or data concerning a natural person's sex life or sexual orientation.
- 2.6 We will only collect and process Sensitive Information where:
  - a) it is necessary for the primary purpose for which it was collected;
  - b) it is directly related to a secondary purpose which is lawful and reasonably expected;
  - c) we have obtained your explicit consent, where required by law; and
  - d) we are otherwise permitted or required to do so under applicable law.
- 2.7 We apply appropriate security and confidentiality measures to protect Sensitive Information, including restricting access, encryption, and data minimisation practices. You may contact us to request more information about our processing of Sensitive Information or to withdraw your consent at any time, where applicable.

## 3. Third-Party Data Collection

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- 3.1 Where reasonable and practicable, we will collect your Personal Information directly from you. However, in some circumstances, we may receive Personal Information about you from third parties (such as service providers, partners, or public sources). In such cases, we will take reasonable steps to:
- a) confirm that the third party has obtained your consent or has a lawful basis to share your information with us;
  - b) notify you of the categories and sources of the Personal Information we have received (as required by applicable law, including GDPR Article 14 and California's CPRA);
  - c) inform you of your rights, including the right to access, correct, or object to our processing of such information; and
  - d) apply appropriate due diligence to ensure that third-party disclosures comply with applicable privacy and data protection obligations.
- 3.2 If your Personal Information is transferred to us from a third party located outside your jurisdiction, we will ensure that appropriate safeguards are in place in accordance with international data transfer rules. Such safeguards will include, as applicable:
- a) the use of standard contractual clauses (SCCs) adopted by the European Commission for transfers from the European Economic Area (EEA), together with the UK international data transfer addendum for transfers from the United Kingdom and carrying out transfer impact assessments where required by law;
  - b) reliance on an adequacy decision or equivalent recognition where available (for example, adequacy for Canada under the European Union General Data Protection Regulation or recognition of participating organisations under the European Union–U.S. data privacy framework for eligible transfers to the United States);
  - c) execution of data transfer or data processing agreements incorporating appropriate contractual safeguards for jurisdictions such as Australia or other regions without adequacy decisions; and
  - d) implementation of additional technical and organisational measures (such as encryption, pseudonymisation and access controls) to ensure equivalent protection of Personal Information.
- 3.3 If any of the mechanisms described in clause 3.2 are invalidated, amended or replaced by a competent authority, we will promptly update our data transfer practices to rely on the most appropriate, lawful mechanism available at the time to ensure continued compliance with applicable data protection laws. We will reflect such updates in this Policy and, where required by law, provide additional notice of any material changes.

#### **4. Third-Party Links and Services**

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Our website or services may contain links to websites or services operated by third parties. These links are provided for your convenience only. We do not control and are not responsible for the

content, privacy policies, or practices of any third-party sites or services. We encourage you to read the privacy policies of those third parties before providing them with your Personal Information.

## **5. Disclosure of Personal Information**

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5.1 Your Personal Information may be disclosed in a number of circumstances, including:

- a) to third-party service providers, contractors, or partners who assist us in operating our business or providing our services, and who are bound by appropriate confidentiality and data protection obligations;
- b) where you have given your consent for the disclosure;
- c) where required or authorised by applicable law, regulation, legal process, or government request; and
- d) In connection with a merger, acquisition, or asset sale, where permitted by law and with appropriate safeguards.

5.2 We ensure that any third parties with whom we share your Personal Information are subject to strict privacy and data protection obligations consistent with this Privacy Policy and applicable laws.

## **6. Security of Personal Information**

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6.1 We take reasonable technical and organisational measures to protect your Personal Information from misuse, interference, loss, and unauthorised access, modification or disclosure. These safeguards include physical, electronic and managerial procedures to protect data integrity and security.

6.2 We retain Personal Information only for as long as necessary to fulfil the purposes for which it was collected, or as required to comply with legal, regulatory, tax, or accounting obligations. When Personal Information is no longer required, we take reasonable steps to securely destroy or permanently de-identify it in accordance with applicable privacy laws,

## **7. Access to your Personal Information**

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7.1 You may access the Personal Information we hold about you and request that it be updated, corrected or restricted, subject to applicable legal exceptions. You may also have the right to object to the processing of your data or to receive a copy of your data in a portable format, depending on your jurisdiction. To exercise these rights, please contact us in writing using the information outlined in Clause 12.

7.2 We do not charge a fee for handling access or correction requests unless the request is manifestly unfounded or excessive, in which case a reasonable fee may be charged, or the request may be refused.

7.3 To protect your Personal Information, we may require you to verify your identity before granting access or processing your request. We aim to respond to all valid requests within the timeframe required by applicable laws and will notify you if an extension is needed.

## **8. Maintaining the accuracy of your Personal Information**

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- 8.1 We take reasonable steps to ensure that the Personal Information we collect, use, and disclose is accurate, complete, and up to date, in accordance with applicable privacy laws. This includes updating records where necessary and responding promptly to correction requests made under Clause 7.
- 8.2 If you become aware that any Personal Information we hold about you is incorrect or has changed, please notify us as soon as practicable. Upon receiving a valid request, we will take reasonable steps to verify and correct the information in a timely manner. We may need to confirm your identity before making the requested changes, to help ensure the security of your Personal Information.
- 8.3 Maintaining accurate information helps us to provide you with better services and comply with our legal obligations.

## **9. Delete all personal information and Mobble data**

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- 9.1 You may have the right, under applicable privacy laws to request the deletion of Personal Information we hold about you.
- 9.2 This request form is intended for individuals who wish to have all personally identifiable information, as well as any current and historical property-related data associated with their account, permanently deleted from Mobble's systems. You can find the form here <https://www.mobble.io/delete-personal-data>. Please note that once submitted and processed, this action is permanent and cannot be undone.
- 9.3 Upon receipt of your request, our customer support team will contact you to verify your identity and confirm the scope of the deletion request. Please be aware that, subject to legal and regulatory requirements, certain information may need to be retained in accordance with applicable laws (e.g. for tax, regulatory, or dispute resolution purposes).
- 9.4 Once the verification process is complete, we will confirm whether the deletion has been executed or provide an explanation if certain data must be retained. We aim to complete deletion requests within the timeframe required by applicable law, and you will be notified once the process is complete.

## **10. Mobile Messaging Terms (SMS Compliance Disclosure)**

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- 10.1 By opting in to receive SMS communications from Mobble, you consent to receive recurring text messages, including service updates, alerts and promotional content, at the mobile number you provide. Message frequency may vary, and standard message and data rates may apply.
- 10.2 You may opt out at any time by replying STOP to any message. Upon doing so, you will receive a confirmation message and no further SMS communications will be sent unless you opt in again. For assistance or additional information, reply HELP or contact us at using the information outlined in Clause 12.
- 10.3 Mobble adheres to the Telephone Consumer Protection Act ("TCPA"), 10DLC carrier requirements, and applicable privacy regulations and laws. We do not share your mobile number with third parties

for their own marketing purposes.

## 11. **Policy Updates**

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- 11.1 We may update this Policy from time to time to reflect changes in our practices, technologies, legal obligations or for other operational, legal or regulatory reasons. Where required by applicable law, we will provide appropriate notice of material changes and, where legally required, obtain your consent before those changes take effect.
- 11.2 We encourage you to review this Privacy Policy periodically to stay informed about how we collect, use and protect your Personal Information. The most current version of this Privacy Policy will always be available on our website. Please refer to the 'Last Updated' date at the top of this Policy to see when it was most recently revised

## 12. **Privacy Policy Complaints and Enquiries**

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If you have any queries or complaints about our Privacy Policy, please contact us at:

**Mobble Pty Ltd** (ACN 629 891 756)

890 Lambing Gully Rd, Avenel, VIC, Aus, 3664

[j@mobble.io](mailto:j@mobble.io)

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