

# Privacy Policy

This Privacy Policy applies to all products and services offered by Mondus Capital Pty Ltd (ACN 659 284 312) trading as Zeroo Home Loans and contains important information about the type of personal information we collect, the purposes for which it is used, how it is managed, to whom we disclose it and what measures are taken to ensure we are compliant with privacy laws. This Privacy Policy applies to anyone who deals with us, or anyone from or about whom we collect personal information.

The *Privacy Act 1988* (Cth) (Privacy Act) and the Australian Privacy Principles (APPs) govern this Privacy Policy. We are bound by the Privacy Act and are committed to complying with the APPs. We take the privacy of your personal information very seriously.

From time to time, we will make changes to this Privacy Policy and will publish those changes on our website.

It is important that you read and understand this Privacy Policy.

## 1. Information We Collect

### Personal Information

We may ask for personal information, such as your:

- Name;
- Email;
- Phone/Mobile Number;
- Address;
- Date of Birth;
- Payment details (such as bank account identifiers);
- Driver's licence; and
- Any other information which is relevant and necessary in providing and delivering our products and services, or to comply with the law.

We may also need to collect sensitive information that includes information or an opinion about you:

- Financial circumstances;
- Hardship information, including information about financial difficulty or vulnerability;
- Credit score;
- Criminal history;
- Which is relevant and necessary to providing products and delivering our services, or to comply with the law.

## Log Data

When you visit our website, our servers may automatically log the standard data provided by your web browser. This may include:

- your computer's Internet Protocol (IP) address;
- your browser type and version;
- the pages you visit and information downloaded including images and data;
- the time and date of your visit;
- Location data;
- Tracking your preferences; and/or
- the time spent on each page.

## Device Data

We may also collect data about the device you're using to access our website. This data may include the device type, operating system, unique device identifiers, device settings, and geo-location data. What we collect can depend on the individual settings of your device and software. We recommend checking the policies of your device manufacturer or software provider to learn what information they make available to us.

Data collection devices are used for various purposes, including:

- to provide you with better and more customised service, such as a more effective website;
- marketing measurement, personalisation and targeting; and/or
- collecting statistical information such as visitor traffic data.

## Business Data

Business data refers to data that accumulates over the normal course of operation on our platform. This may include transaction records, stored files, user profiles, analytics data, and other metrics, as well as other types of information created or generated as users interact with our services.

## 2. Basis for Processing

We will process your information lawfully, fairly, and in a transparent manner. We collect and process information about you only where we have legal bases for doing so to provide our product and services to you. These legal bases depend on the products and services you use and how you use them, meaning we collect and use your information only where:

- It is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract (e.g., when we provide a service or product you request from us).
- It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote our products or services, and to protect our legal rights and interests.
- You give us consent to do so for a specific purpose.
- We need to process your data to comply with a legal obligation.

Where you consent to our use of information about you for a specific purpose, you have the right to change your mind at any time (but this will not affect any processing that has already taken place).

We don't keep personal information for longer than is necessary. While we retain this information, we will protect it within commercially acceptable means to prevent loss and theft, as well as unauthorised access, disclosure, copying, use, or modification. Whilst we take the greatest endeavours to protect your personal information no method of electronic transmission or storage is 100% secure and we cannot guarantee absolute data security.

### **3. Collection**

At the time of request, we will inform you the main reasons for collecting your personal information. We will collect sensitive information where it is necessary for providing our services, functions and activities or purposes such as risk identification, compliance with legislation and credit evaluation.

The personal information we hold about you may also include sensitive information or credit information.

### **4. Use of Information**

We collect, hold, use, and disclose personal information in accordance with APP for the following purposes:

- To provide you with our website's core features.
- To assess and process applications for credit.
- To enable us to assess your credit worthiness.
- To enable you to access and use our website, associated applications, and associated platforms.
- To contact and communicate with you.
- For internal record-keeping and administrative purposes.
- Assessing risks.
- Training our employees, agents and representatives.
- To assist with audits, reviews and investigations or enquiries concerning our good or services supplied by us to you or otherwise.
- To exercise, enforce, take lawful action in respect of, secure or perfect any right or agreement.

### **5. Disclosure of Personal Information to Third Parties**

We may disclose personal information to:

- Third-party service providers for the purpose of enabling them to provide their services, including (without limitation) financial service providers, data storage, web-hosting and server providers, debt collectors, maintenance or problem-solving providers, professional advisors, and payment systems operators.
- Credit reporting agencies, courts, tribunals, and regulatory authorities, in the event you fail to pay for services or products we have provided to you.
- Courts, tribunals, regulatory authorities, and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or to establish, exercise, or defend our legal rights.

When you use a link from our website to which this Privacy Policy applies to third party websites, we have no control over these third-party websites. These third-party websites are not subject to our privacy standards and we

## 6. International Storage of Personal Information

Some of the personal information we collect through this website may be stored and processed in the United States and Australia, where we or our partners, affiliates, and third-party providers maintain facilities. By providing us with your information, you consent to the disclosure to these overseas third parties.

Where we transfer personal information from an Australia to another country, you acknowledge that third parties in other jurisdictions may not be subject to similar data protection laws. There are risks that any such third party engages in any act or practice that would contravene the data privacy laws in our jurisdiction, and this might mean that you will not be able to seek redress under our jurisdiction's privacy laws. Always read the privacy and security statements of these respective third parties when using their websites.

## 7. Your Rights and Controlling Your Personal Information

**Consent:** By providing your information to us, you consent to us collecting, holding, using, and disclosing your information in accordance with this privacy policy.

**Information from Third Parties:** If we receive personal information about you from a third party, we will protect it as set out in this privacy policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

**Restrict:** You may choose to restrict the collection or use of your personal information. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by contacting us using the details below. If you ask us to restrict or limit how we process your personal information, we will let you know how the restriction affects your use of our website or products and services.

**Access to and accuracy of personal information:** You may request details of the personal information that we hold about you. You may request a copy of the personal information we hold about you. Where possible, we will provide this information unless we are prevented by law from giving you that access. You may request that we erase the personal information we hold about you at any time. You may also request that we transfer this information to another third party. If we are unable to provide you with the requested information, we will provide you with a written explanation. We take reasonable measures to ensure that the personal information we hold about you is accurate and up to date.

**Website Links** this Privacy Policy applies to websites and mobile apps operated by us. We have no control over third party websites, which are not subject to our privacy standards. We take no responsibility for the conduct or adherence to the APP of these third parties. Always read the privacy and security statements of these respective third parties when using their websites.

**Correction:** If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant, or misleading, please contact us using the details below. Under the Privacy Act, you have the right to request we correct information. We will take reasonable steps to correct any information found to be inaccurate, incomplete, misleading, or out of date. We will promptly update any information that is incorrect and confirm to you when we have done so.

Pseudonym: where possible, you have the option of interacting with us anonymously or pseudonymously. Whilst you are entitled to interact with us anonymously or by using a pseudonym, we may need to identify you in order to provide our products and services.

Unsubscribe: To unsubscribe from our e-mail database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

## 8. Notification of Data Breaches

We will comply with laws applicable to us in respect of any data breach. For further information on how we handle data breaches, please refer to our data breach policy.

## 9. Cookies

We use “cookies” in a limited manner to collect information about you and your activity across our site. A cookie is a small piece of data that our website stores on your computer and accesses each time you visit so we can understand how you use our site. This helps us serve you content based on preferences you have specified. Cookies are frequently used on our website. Cookies are not used by us to collect or store your personal information. You can choose if and how a cookie will be accepted by configuring your preferences and options in your internet browser. You can manually configure your browser to refuse cookies or may manually delete existing cookies from your hard drive. However, by deleting or refusing to accept cookies you may frustrate or hinder your access or use of our website.

We use cookies for different purposes such as:

- to allocate a unique number to your internet browser;
- to customise our website for you;
- for statistical purposes;
- for security purposes; or
- to authenticate or identify whether you are registered on our website, without requiring you to re-enter details each time you log on to our website.

The types of data we collect includes:

- your device’s IP address (collected and stored in an anonymized format);
- search terms and pages visited on our website;
- date and time when pages were accessed;
- downloads, time spent on page, and bounce rate;
- referring domain and out link if applicable;
- device type, operating system and browser information;
- device screen size;
- your geographic location.

## **10. Business Transfers**

If we or our assets are acquired, or in the unlikely event that we go out of business or enter bankruptcy, we would include data among the assets transferred to any parties who acquire us. You acknowledge that such transfers may occur, and that any parties who acquire us may continue to use your information according to this policy.

## **11. Changes to This Policy**

From time to time and at our discretion, we may change our privacy policy to reflect current acceptable practices. We will take reasonable steps to let users know about changes via our website. Your continued use of this site after any changes to this policy will be regarded as acceptance of our practices around privacy and personal information.

If we make a significant change to this privacy policy, for example changing a lawful basis on which we process your personal information, we will ask you to re-consent to the amended privacy policy.

## **12. Complaints**

If you believe that we have breached a relevant data protection law and wish to make a complaint, please contact us using the details below and provide us with full details of the alleged breach. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your complaint.

You also have the right to contact a regulatory body or data protection authority in relation to your complaint.

## Contact Details

For any questions or concerns regarding your privacy, you may contact us using the following details:

Mondus Capital Pty Ltd

1/2 Keith Campbell Ct, Scoresby VIC 3179

Email: [info@mymondus.com](mailto:info@mymondus.com)

Phone: 0422362290

Office of the Australian Information Commissioner

GPO Box 5218, Sydney NSW 2001

Website: [www.oaic.gov.au](http://www.oaic.gov.au)

Phone: 1300 363 992

Zeroo Home Loans is a trading name of Mondus Capital Pty Ltd (ACN 659 284 312) and does not constitute a separate legal entity.