

1. Overview

- 1.1. This Privacy Policy applies to Sell & Parker Pty Ltd (ACN 000 101 315), its associated entities and its related bodies corporate (as defined in the *Corporations Act 2001* (Cth)) (together, **Sell & Parker Group** or **we/us/our**).
- 1.2. We are committed to protecting personal information in accordance with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (**APPs**).
- 1.3. This Policy sets out how we collect, use, disclose, store and otherwise manage personal information across the Sell & Parker Group.
- 1.4. Entity-specific practices are set out in Schedule 1 (Entity-Specific Provisions).

2. Personal information and sensitive information

- 2.1. Personal information means information or an opinion about an identified individual or an individual who is reasonably identifiable.
- 2.2. We may also collect sensitive information (as defined in the Privacy Act), including but not limited to information relating to health, criminal history or membership of a professional association.
- 2.3. Sensitive information will only be collected, used or disclosed:
 - (a) for the primary purpose for which it was collected;
 - (b) for a directly related secondary purpose;
 - (c) with consent; or
 - (d) where otherwise permitted or required by law.

3. Collection of personal information

- 3.1. We collect personal information only where it is reasonably necessary for our functions or activities or where required or authorised by law.
- 3.2. The types of personal information we collect may include:
 - (a) names and contact details;
 - (b) business and transactional information;
 - (c) financial or credit information (including for credit assessment);
 - (d) identification information; and
 - (e) information you provide to us in communications or enquiries.
- 3.3. We collect personal information in a variety of ways, including:
 - (a) directly from you (including in person, by telephone, email or via our websites);
 - (b) from third parties (including referees, service providers or platforms), where permitted; and
 - (c) through automated means, including IP address, device information, browsing behaviour, website interactions, and cookies.
- 3.4. Where personal information is collected from a third party, we will take reasonable steps to ensure you are aware of the collection.
- 3.5. At or before the time of collection (or as soon as practicable after), we will take reasonable steps to notify you of:
 - (a) the purposes of collection;
 - (b) the consequences of not providing the information; and
 - (c) the disclosures contemplated by this Policy.
- 3.6. Personal information may also be collected and used for identity verification purposes in connection with the collection or delivery of goods. In certain circumstances, we are required by law or regulatory obligations to retain copies of identification and transaction records.
- 3.7. If you do not provide personal information requested by us, we may be unable to provide certain products or services or to otherwise deal with you.

4. Use of personal information

- 4.1. We use personal information for the primary purpose of collection and for related secondary purposes that you would reasonably expect.
- 4.2. Without limitation, we may use personal information to:
 - (a) supply, purchase or facilitate goods and services;
 - (b) process transactions and manage accounts;
 - (c) undertake credit assessments and manage credit risk;
 - (d) communicate with you, including responding to enquiries and providing updates; and
 - (e) comply with legal and regulatory obligations.
- 4.3. We may also use personal information for direct marketing purposes where permitted by law. This may include communications by SMS, email or other electronic means, subject to your consent.
- 4.4. You may opt out of receiving marketing communications at any time using the unsubscribe facility or by contacting us. You may also opt out of certain targeted advertising through your browser settings or advertising platform controls

5. Disclosure of personal information

- 5.1. We may disclose personal information where reasonably necessary for our operations or where required or authorised by law.
- 5.2. This may include disclosure to:
 - (a) related entities within the Sell & Parker Group;
 - (b) contractors, suppliers, logistics providers and other third-party service providers;
 - (c) professional advisers, insurers and financiers;
 - (d) credit reporting agencies;
 - (e) regulators, courts or law enforcement agencies; and
 - (f) government agencies where required under applicable laws or contracts.
- 5.3. We may also disclose personal information in connection with a sale, merger or restructuring of our business, subject to appropriate confidentiality arrangements.

6. Overseas disclosure

- 6.1. Some third-party service providers engaged by us may be located outside Australia. This may include the use of third-party marketing or communications platforms which store personal information outside Australia, including providers of cloud, data hosting and marketing services.
- 6.2. Where personal information is disclosed to an overseas recipient, we will take reasonable steps to ensure that the recipient does not breach the APPs in relation to that information, unless an exception applies under the Privacy Act.

7. Security and retention

- 7.1. We take reasonable steps to protect personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure.
- 7.2. These steps include physical, electronic and administrative safeguards.
- 7.3. We retain personal information only for as long as reasonably necessary for our business or legal purposes and thereafter:
 - (a) destroy the information; or
 - (b) de-identify it.

8. Access and correction

- 8.1. You may request access to personal information we hold about you.
- 8.2. You may also request correction of personal information that is inaccurate, out-of-date, incomplete, irrelevant or misleading.
- 8.3. We will respond to requests within a reasonable time and in accordance with the Privacy Act.
- 8.4. We may refuse access or correction where permitted by law and will provide reasons where required.

9. Complaints

- 9.1. If you believe we have breached the Privacy Act or the APPs, you may make a complaint to us.
- 9.2. We will investigate and respond within a reasonable timeframe.
- 9.3. If you are not satisfied with our response, you may refer the matter to the Office of the Australian Information Commissioner (**OAIC**).

10. Website, cookies and analytics

- 10.1. We may collect non-identifiable information about your interaction with our websites to improve functionality and user experience.
- 10.2. Our websites may use cookies and similar technologies to:
 - (a) recognise returning users;
 - (b) analyse traffic and usage patterns; and
 - (c) deliver relevant advertising.

These activities may include the use of analytics, tracking technologies and targeted advertising tools to better understand user behaviour and improve services. We may also use technologies such as pixel tags or web beacons to track user engagement with websites or communications.

- 10.3. We may engage advertising partners to deliver targeted advertising based on your website usage, interests and interactions (online behavioural advertising). You may opt out of such targeting through available platform tools or by adjusting your browser settings.
- 10.4. Our websites may contain links to third-party websites. We are not responsible for the privacy practices of those sites.

11. Changes to this Policy

- 11.1. We may amend this Policy from time to time.
- 11.2. The current version will be published on our website and will apply from the date of publication.

12. Contact

Privacy Officer
Sell & Parker Group
Email: privacy@sellparker.com.au