

OCTA CORP PTY LTD PRIVACY POLICY

This policy outlines the ways in which Octa Corp Pty Ltd (ACN 661 574 581), its related entities and franchisees trading as 'Octa Corp Pty Ltd' ("We") collect, use, disclose, store, secure, manage and dispose of your Personal Information in accordance with the Australian Privacy Act 1988 (Cth) and the New Zealand Privacy Act 2020 (Privacy Laws). We comply with all Privacy Laws in respect of the collection, management and disclosure of your personal information.

All statements and advice made on our website www.octacorpptyltd.com.au are made in good faith and are general in nature. No warranty of accuracy or reliability arising in any way for errors or omissions (including responsibility to any person of negligence) is accepted by Octa Corp Pty Ltd or any employee or director thereof.

Where the words "**Personal Information**" are used in this policy, that expression means information or an opinion that is either specifically about you, or if you are not specifically identified but you are reasonable capable of being identified, irrespective as to:

- (a) Whether the information or opinion is true or not; and
- (b) Whether the information or opinion is recorded in a material form or not.

The Kinds of Personal Information We Collect and Hold

The kinds of Personal Information we collect from you may vary depending upon the nature of the building services you have instructed us to provide. Generally, we will initially collect information regarding your name, address and contact details in order to process any enquiry you may submit to us regarding the construction of your renovation by us. Where necessary to provide building services to you, we may also collect from you the proposed building site address, evidence of your ownership of the building site address, and your financial details, including the details of your financier, in order to process your payments to us.

We may also collect:

- (a) any information you provide to us during telephone calls, or in any email correspondence to our representatives from time to time;
- (b) any information that you provide to us directly through our Websites, Customer Care team or our Customer Experience Surveys.

How We Collect and Hold your Personal Information

We will collect the majority of your Personal Information from you directly, in different ways including:

- (a) when you visit our Websites;
- (b) when you make an enquiry about our services using our Websites or over the phone;
- (c) through your access and use of social media, our Websites, including information collected using cookies and similar technologies (including third party cookies such as Google Analytics) both directly and indirectly;
- (d) during conversations between you and our representatives;
- (e) when you ask to be placed on one of our mailing lists;
- (f) when you enter promotions or competitions conducted by us, interact with our advertisements or participate in a survey or other market research activities;
- (g) when you contact us with a complaint in relation to our services; or
- (h) when you become a customer or a debtor of ours.

We may also however obtain your Personal Information from:

- (a) Government Departments or Agencies by undertaking searches or by request;
- (b) your legal representative;
- (c) your financier;
- (d) Real estate or other property agents who have referred you to us; or
- (e) our franchisees and related bodies corporate.

We will obtain your consent before contacting any third party for the purposes of collecting your Personal Information.

We collect website activity statistics such as the number of visitors, pages visited, time and date of visit and where you accessed our Websites from, so that we can make informed decisions relating to improving our Websites and the services we deliver. This information is anonymous and doesn't identify a person.

When you visit our Website a cookie is placed on your computer. The cookie does not contain personal information that can identify you, but may contain information about the page you visited on our Websites. If you do not wish for this to occur, you can remove cookies from your computer, by following the standard procedures applicable to your internet browser.

We may also work with other companies who use tracking technologies, including web beacons, to serve ads on our behalf across the internet. These companies may collect non-personally identifiable information about your visit to our Websites about your interaction with our mobile app or communications, including advertising and e-mails. If you object to web beacons, we

recommend that you follow the instructions for deleting existing cookies and disabling future cookies.

What happens if you choose not to provide your personal information?

If you choose not to provide us with your personal information, we may not be able to:

- (a) provide services you may require;
- (b) process any promotions or benefits;
- (c) some functions on our Websites may be restricted or not operational;
- (d) tailor the content of our Websites to your preferences and your experience of our Websites may not be as useful or enjoyable.

The Purposes for which we Collect, Hold, Use and Disclose your Personal Information

We collect, hold, use and disclose your Personal Information for the following purposes:

- (a) providing building services to you or someone else you know;
providing you with information about other services that we, our related entities and other organisations that we have affiliations with, offer that may be of interest to you;
- (b) facilitating our internal business operations, including providing personal information to our related bodies corporate, suppliers, contractors, service providers and the fulfilment of any legal requirements;
- (c) facilitating payments for our services;
- (d) monitoring and analysing our service standards as well as customer needs and satisfaction with the view of improving our building services;
- (e) for our administrative, marketing (including direct marketing and marketing research), other communications, planning, service development, support, quality control, human resources, educational, data analytics and research purposes, and for our franchisees, related bodies corporate, contractors or service providers;
- (f) to administer any contest, promotion and survey that we may run from time to time (for instance to deliver a prize you may have won in a contest);.
- (g) to process and respond to any complaint or enquiry made by you; and
- (h) to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country.

If you provide personal information about a third party individual to us, you must ensure that the third party individual is aware of this Privacy Policy, understands it and agrees to accept it. If you provide personal information about a third party individual and that individual does not have the capacity to understand and agree to these terms (for example, a minor), we require a parent or guardian to acknowledge and agree to this paragraph.

We may also use your personal information for other purposes, either after notifying you at the time of collection or where those uses are otherwise permitted by law. Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy and permitted by law.

Disclosure of Personal Information

We may disclose personal information to the following for the purposes of providing our services to you, and as required by law:

- (a) our employees, franchisees and related bodies corporate, contractors or service providers for the purposes of operating our Websites, our business, fulfilling requests by you, and to otherwise provide services to you including, without limitation, suppliers and manufacturers, web and cloud hosting providers, cyber security service providers, order fulfilment and shipping providers, customer service desk, IT systems administrators, mailing houses, couriers, payment processors, support providers, data entry service providers, data analysts, electronic network administrators, debt collectors, archivists and professional advisors such as accountants, solicitors, business advisors and consultants;
- (b) suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes;
- (c) to government and regulatory bodies and law enforcement agencies;
- (d) any other organisation for any authorised purpose with your express consent, including your insurers and your solicitors.

We also may also share non-personal information, such as the number of users who visited our Websites during a specific time period or who enquired about a particular service or project through the Websites, with our marketing partners, advertisers and others from time to time. This information generally is shared in an aggregated form.

We are not responsible for the privacy policies of any of our suppliers or any third party. Third parties are responsible for informing you about their own privacy practices. However, we will make reasonable requests to the third party to follow this Privacy Policy regarding handling of your personal information.

Direct Marketing Materials

We may send you direct marketing communications and information about our services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the Australian Spam Act 2003 (Cth) and the New Zealand Unsolicited Electronic Messages Act 2007. If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out

facilities provided in the marketing communications and we will then ensure that your name is removed from the mailing list.

We may also disclose your personal information to our related bodies corporate, our other business partners and our service providers to give you information and offers about services offered by us or these companies.

How you May Access or Seek the Correction of Personal Information Held by Us

You may access or seek the correction of any Personal Information held by us by contacting the Octa Corp Pty Ltd Consultant with whom you are dealing in your current building matter with us. Alternatively, you may contact your relevant Head Office using the contact details available at our Websites.

We are committed to protecting your privacy and as such we treat all complaints very seriously. Our Privacy Officer will address your concerns with our National Head Office and contact you to ensure you are satisfied with our proposed resolution. If we do not respond to you within 14 days or you are not satisfied with our response, you are entitled to lodge a complaint to the applicable Privacy Commissioner:

For Australia at:

Office of the Australian Information Commissioner

www.oaic.gov.au

1300 363 992

For New Zealand at:

Office of the Privacy Commissioner

www.privacy.org.nz

0800 803 909

Our Disclosure of Your Personal Information to Overseas Recipients

We will generally only disclose your Personal Information to the following persons:

- (a) One of our franchise Octa Corp Pty Ltd builders in your area;
- (b) One of our related entities;
- (c) Our consultants, contractors and service providers where the disclosure is necessary to assist us in providing the building services you have requested, we provide to you.

We may also in the course of fulfilling our contract with you disclose your Personal Information to overseas recipients. This may occur in the following circumstances:

- (a) Where you instruct us to disclose, whether in writing or verbally, information which contains your Personal Information to an overseas party; or

(b) Where your Personal Information is disclosed for the purposes of preparing documentation on your behalf, and the employee, agent, representative, or contractor retained to assist in the preparation of the documentation is based overseas.

Countries in Which Overseas Recipients Likely to be Located

We do not as a matter of course disclose the Personal Information of our Australian and New Zealand clients or customers to overseas recipients. Where we intend to do so, we will advise you of the location in which such overseas recipient is likely to be located so as to obtain your informed consent to such a disclosure before it is made.

Accessing Third Party Links

Our Websites may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

Updates to this Policy

We reserve the right to make changes to this Privacy Policy from time to time. Please review our Websites periodically to see any updates to the information provided here. This Privacy Policy was last updated on 24 January 2023.