



PRIVACY POLICY

Get Smart Home has developed this Privacy Policy to explain how we may collect, retain, process, share and transfer your [Personal Data](#) when you visit our Sites or use our Services or make payments. This Privacy Policy applies to your Personal Data when you visit [Sites](#) or use [Services](#), and does not apply to online websites or services that we do not own or control.

This Privacy Policy is designed to help you obtain information about our privacy practices and to help you understand your privacy choices when you use our Sites and Services.

We have defined some terms that we use throughout the Privacy Policy. You can find the meaning of a capitalized term in the [Definitions](#) section.

Please [contact us](#) if you have questions about our privacy practices that are not addressed in this Privacy Policy.

2. What Personal Data Do We Collect?

The primary purpose for collecting your Personal Data is to provide you with a secure, smooth, efficient, and customised experience. We may collect information about you when you visit our Sites or use our Services, including the following:

- **Registration and use information** – When you register to use our Services by establishing an [Account](#), we will collect Personal Data as necessary to offer and fulfill the Services you request. Depending on the Services you choose, we may require you to provide us with your name, postal address, telephone number, email address and identification information to establish an Account. We may require you to provide us with additional Personal Data as you use our Services.
- **Transaction and experience information** – When you use our Services or access our Site, make payments using credit cards etc, we collect information about the transaction, as well as other information associated with the transaction such as amount paid, accounts paid from, personal information etc.
- **Participant information** – When you use our Services or access our Sites, we collect Personal Data you provide us about the other participants associated with the transaction.
 - **Make payments:** When you make payments through the Services, we collect Personal Data such as name, postal address, telephone number, and financial account information about the participant who is paying the money. The extent of Personal Data required about a participant may vary depending on the Services you are using to make payment.
- **Information that you choose to provide us to obtain additional Services or specific online Services** – If you request or participate in an optional Site feature, or request enhanced Services or other elective functionality, we may collect additional information from you. We will provide you with a separate notice at the time of collection, if the use of that information differs from the uses disclosed in this Privacy Policy.



- **Other information we collect related to your use of our Sites or Services** – We may collect additional information from or about you when you communicate with us, contact our customer support teams or respond to a survey.

3. Why Do We Retain Personal Data?

We retain Personal Data to fulfill our legal or regulatory obligations and for our business purposes. We may retain Personal Data for longer periods than required by law if it is in our legitimate business interests and not prohibited by law. If your Account is closed, we may take steps to mask Personal Data and other information, but we reserve our ability to retain and access the data for so long as required to comply with applicable laws. We will continue to use and disclose such Personal Data in accordance with this Privacy Policy.

4. How Do We Process Personal Data?

We may [Process](#) your information for the following reasons:

- **To operate the Sites and provide the Services**, including to:
 - execute a payment;
 - confirm your identity;
 - authenticate your access to an Account;
 - communicate with you about your Account, the Site, the Services;
 - perform creditworthiness and other financial standing checks, evaluate applications, and compare information for accuracy and verification purposes
- **To manage our business needs**, such as monitoring, analyzing, and improving the Services and the Sites' performance and functionality.
- **To manage risk and protect the online website, the Services and you from fraud by verifying your identity**, and helping to detect and prevent fraud and abuse of the Sites or Services.
- **To market to you** by delivering marketing materials about Get Smart Home products and online Services and the products and services of unaffiliated businesses. We may also Process your Personal Data to tailor certain Services or Site experiences to better match our understanding of your interests.
- **To comply with our obligations and to enforce the terms of our Sites and Services**, including to comply with all applicable laws and regulations.
- **To make it easier for you to find and connect with others**, we may use your information you have shared with the Service to suggest connections between you and people you may know. For example, we may associate information that we learn about you through your and your contacts' use of the Services, and information you and others provide to suggest people you may know or may want to transact with through our Services. Social functionality and features designed to simplify your use of the Services with others vary by Service.
- **To respond to your requests**, for example to contact you about a question you submitted to our customer service team.



5. Do We Share Personal Data?

We may share your Personal Data or other information about you with others in a variety of ways as described in this section of the Privacy Policy.

We may share your Personal Data or other information for the following reasons:

With other members of the Get Smart Home corporate family: We may share your Personal Data with members of the Get Smart Home family of entities to, among other things, provide the Services you have requested or authorized; to manage risk; to help detect and prevent potentially illegal and fraudulent acts and other violations of our policies and agreements; and to help us manage the availability and connectivity of Get Smart Home products, Services, and communications.

With other companies that provide services to us: We may share Personal Data with third-party service providers that perform services and functions at our direction and on our behalf. These third-party service providers may, for example, provide you with Services, verify your identity, assist in processing transactions, send you advertisements for our products and Services, or provide customer support.

With other financial institutions that we have partnered with to jointly create and offer a product or service: We may share Personal Data with other financial institutions that we have partnered with to jointly create and offer a product.

With other third parties for our business purposes or as permitted or required by law: We may share information about you with other parties for Get Smart Home's business purposes or as permitted or required by law, including:

- if we need to do so to comply with a law, legal process or regulations;
- to law enforcement authorities or other government officials, or other third parties pursuant to a subpoena, a court order or other legal process or requirement;
- if we believe, in our sole discretion, that the disclosure of Personal Data is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity;
- to protect the vital interests of a person;
- to investigate violations of or enforce a user agreement or other legal terms applicable to any Service;
- to protect our property, Services and legal rights;
- to facilitate a purchase or sale of all or part of Get Smart Home's business;
- in connection with shipping and related services for purchases made using a Service;
- to help assess and manage risk and prevent fraud against us, our Users and fraud involving our Sites or use of our Services, including fraud that occurs at or involves our business partners, strategic ventures, or other individuals and merchants, such as eBay, Inc.;
- to banking partners as required by card association rules for inclusion on their list of terminated merchants;
- to credit reporting and collection agencies;
- to companies that we plan to merge with or be acquired by; and



- to support our audit, compliance, and corporate governance functions.

With your consent: We also will share your Personal Data and other information with your consent or direction, including if you authorize an account connection with a third-party account or platform.

7. How Do We Use Cookies and Tracking Technologies?

When you visit our Sites, use our Services, or visit a third-party website for which we provide online Services, we and our business partners and vendors may use cookies and other tracking technologies (collectively, “Cookies”) to recognize you as a User and to customize your online experiences, the Services you use, and other online content and advertising; measure the effectiveness of promotions and perform analytics; and to mitigate risk, prevent potential fraud, and promote trust and safety across our Sites and Services. Certain aspects and features of our Services and Sites are only available through the use of Cookies, so if you choose to disable or decline Cookies, your use of the Sites and Services may be limited or not possible.

Do Not Track (DNT) is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third-parties. We do not respond to DNT signals.

8. What Privacy Choices Are Available To You?

You have choices when it comes to the privacy practices and communications described in this Privacy Policy. Many of your choices may be explained at the time you sign up for or use a Service or in the context of your use of a Site. You may be provided with instructions and prompts within the experiences as you navigate the Services.

• Choices Relating to the Personal Data We Collect

- Personal Data. You may decline to provide Personal Data when it is requested by Get Smart Home, but certain Services or all of the Services may be unavailable to you.
- Location and other device-level information. The device you use to access the Sites or Services may collect information about you, including Geolocation Information and User usage data that Get Smart Home may then collect and use. For information about your ability to restrict the collection and use of such information, please use the settings available in the device.

• Choices Relating to Cookies

- You may have options available to manage your cookies preferences. For example, your browser or internet device may allow you delete, disable, or block certain cookies and other tracking technologies. You can learn more by visiting AboutCookies.org. You may choose to enable these options, but doing so may prevent you from using many of the core features and functions available on a Service or Site.
- You may have an option regarding the use of cookies and other tracking technologies when you use a Service or visit parts of a Site. For example, you may be asked if you want the Service or Site to “remember” certain things about you, and we will use cookies and other tracking technologies to the extent that you permit them.

• Choices Relating to Your Registration and Account Information



- If you have an Account, you generally may review and edit Personal Data by logging in and updating the information directly or by contacting us. [Contact us](#) if you do not have an Account or if you have questions about your Account information or other Personal Data.
- **Choices Relating to Communication**
 - **Notices, Alerts and Updates from Us:**
 - **Marketing:** We may send you marketing content about our Sites, Services, products, products we jointly offer with financial institutions, as well as the products and services of unaffiliated third parties and members of the Get Smart Home corporate family through various communication channels, for example, email, text, pop-ups, push notifications, and messaging applications. You may opt out of these marketing communications by following the instructions in the communications you receive. If you have an Account with us, you may also adjust your communication preferences in your Account settings. For messages sent via push notifications, you may manage your preferences in your device.
 - **Informational and Other:** We will send communications to you that are required or necessary to send to Users of our Services, notifications that contain important information and other communications that you request from us. You may not opt out of receiving these communications. However, you may be able to adjust the media and format through which you receive these notices.

9. How Do We Protect Your Personal Data?

We maintain technical, physical, and administrative security measures designed to provide reasonable protection for your Personal Data against loss, misuse, unauthorized access, disclosure, and alteration. The security measures include firewalls, data encryption, physical access controls to our data centers, and information access authorization controls. While we are dedicated to securing our systems and Services, you are responsible for securing and maintaining the privacy of your password(s) and Account/profile registration information and verifying that the Personal Data we maintain about you is accurate and current. We are not responsible for protecting any Personal Data that we share with a third-party with your consent.

10. Can Children Use Our Services?

The Sites and Services are not directed to children under the age of 13. We do not knowingly collect information, including Personal Data, from children or other individuals who are not legally able to use our Sites and Services. [Contact us](#) if you believe that we have mistakenly or unintentionally collected information from a child under the age of 13.

11. What Else Should You Know?

Changes to This Privacy Policy.

We may revise this Privacy Policy from time to time to reflect changes to our business, the Sites or Services, or applicable laws. The revised Privacy Policy will be effective as of the published effective date.

Transfers of Your Personal Data to Other Countries

Our operations are supported by a network of computers, cloud-based servers, and other infrastructure and information technology, including, but not limited to, third-party service providers. We and our third-party service providers may store



and Process your Personal Data elsewhere in the world. We will protect your information as described in this Privacy Policy if your Personal Data is transferred to other countries. By using our Sites and Services, you consent to your Personal Data being transferred to other countries, including countries that have different data protection rules than your country. We do not represent that our Sites and Services are appropriate or available in any particular jurisdiction.

12. Contact Us

You may contact us if you have general questions about our Privacy Policy and practices or questions about your Account information or Personal Data.

Alternatively, you can contact us at:

Email: info@getsmarthome.com.au
Mail: 8/53-57 Rimfire Drive, Hallam VIC 3803

Handling your complaints

We aim to:

- Acknowledge receipt of all complaints within 5 business days.
- Resolve all complaints within 45 days. This may not be possible in all circumstances.

Where we cannot resolve a complaint within 45 days, we will notify you of the reason for the delay as well as an indication of when we expect to resolve the complaint. If you are not satisfied with the outcome of your complaint, you may wish to contact the Financial Ombudsman Service for most complaints about your credit information. Alternatively, you may contact the Office of the Australian Information Commissioner.

13. Definitions

Account means a Get Smart Home member account.

Device Information means data that can be automatically collected from any device used to access the Sites or Services. Such information may include, but is not limited to, your device type; your device's network connections; your device's name; your device's IP address; information about your device's web browser and the internet connection being used to access the Site or Services; Geolocation Information; information about apps downloaded to your device; and biometric data (e.g., Touch ID/Fingerprint to verify your identity)

Geolocation Information means information that identifies with reasonable specificity your location by using, for instance, longitude and latitude coordinates obtained through GPS, Wi-Fi, or cell site triangulation. Some of our Services may ask you for permission to share your current location. Some of the Sites and Services require this information to provide a



specific product or online Service. If you do not agree to our collection of the geolocation information, our Sites or Services may not function properly when you try to use them.

Get Smart Home means Boss Reality Australia ACN 613 663 460 t/a Get Smart Home and subsidiaries or affiliates. In this Privacy Policy, Get Smart Home is sometimes referred to as “we,” “us,” or “our,” depending on the context.

Personal Data means information that can be associated with an identified or identifiable person. “Personal Data” can include name, postal address (including billing and shipping addresses), telephone number, email address, payment card number, other financial account information, account number, date of birth, and government-issued credentials (e.g., driver’s licence number, national ID, or passport).

Process means any method or way that we handle Personal Data or sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, and consultation, disclosure by transmission, disseminating or otherwise making available, alignment or combination, restriction, erasure or destruction of Personal Data.

Services means any products, services, content, features, technologies, or functions, and all related websites, applications and services offered to you by Get Smart Home in connection with an Account or Guest Transaction.

Sites means the websites, mobile apps, official social media platforms, or other online properties through which Get Smart Home offers the Services and which has posted or linked to this Privacy Policy.

Technical Usage Data means information we collect from your phone, computer or other device that you use to access the Sites or Services. Technical Usage Data tells us how you use the Sites and Services, such as what you have searched for and viewed on the Sites and the way you use our Services, including your IP address, statistics regarding how pages are loaded or viewed, the websites you visited before coming to the Sites and other usage and browsing information collected through Cookies.

User means an individual who uses the Services or accesses the Sites and has established a relationship with Get Smart Home (for example, by opening an Account and purchasing Get Smart Home products) or otherwise uses the Services offered by Get Smart Home.