

Promontory Point Pty Limited t/a Better That Connect (ACN 663 219 029) (**BT Connect, we, us or our**) and its Related Bodies Corporate (as defined in the *Corporations Act 2001* (Cth)) are committed to protecting and maintaining the privacy, accuracy and security of the personal information you provide to us.

We abide by and are bound by the Australian Privacy Principles and the *Privacy Act 1988* (Cth) (**Privacy Act**), which govern the way private sector organisations collect, use, keep secure and disclose personal information.

The Privacy Act defines “Personal information” to mean any information or an opinion about an identified individual, or an individual who is reasonably identifiable; whether the information is true; and whether the information is recorded in material form.

“Personal Data” means any information relating to an identified or identifiable natural person (i.e. by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person). We are required to comply EU General Data Protection Regulation (GDPR) for persons located in the European Union in relation to your Personal Data. Please refer to section 10 if this applies to you.

About this Privacy Policy

The purpose of this Privacy Policy is to explain:

- the scope and application of this Privacy Policy;
- the kind of Personal Information and Personal Data *BT Connect* may collect about you and how we collect the information;
- how we use your Personal Information and Personal Data;
- how we may disclose your Personal Information and Personal Data;
- how we protect the Personal Information and Personal Data we hold about you; and
- how you can access and manage, including transfer and delete, the Personal Information and Personal Data we hold about you.

This Privacy Policy applies to Personal Information and Personal Data collected by *BT Connect* by any means or technology. By using the *BT Connect* App or the website operated by *BT Connect* (“platform”), or otherwise interacting with us in relation to the service offered by us and the products and services offered by our business partners (including participating in offered promotions), you consent to *BT Connect* using your Personal Information and Personal Data as

set out in this Privacy Policy.

If you have any concerns or questions, please contact us at the details set out in section 9 and our privacy officer will resolve your concerns and answer your questions (resident of the European Union, refer to section 10).

Links to other sites

Our platform may contain links to other sites, including our business partners who are offering products and services via *BT Connect's* platform, that are not owned or controlled by *BT Connect*. Please be aware that we are not responsible for the privacy practices of such other sites and you access these sites at your own risk. You should therefore familiarise yourself with privacy policies of those sites.

Section I: What kind of Personal Information and Personal Data do we collect and hold?

In the process of conducting our business, we are likely to collect a range of Personal Information or Personal Data from or about you. The types of Personal Information or Personal Data we collect generally includes:

- your name, your Company name;
- residential, shipping and billing addresses;
- email address;
- telephone or mobile numbers;
- username and password stored with us;
- other Personal Information or Personal Data that may be volunteered by you in the content of any enquiry you make with us;
- any Personal Information or Personal Data collected as a result of your interactions with, or posts about, us on blogs and forums online such as: user account information and any other Personal Information or Personal Data contained in such a post;
- Personal Information or Personal Data collects as a result of your interactions with us on social media, through feedback and surveys or entry into any competitions;
- interests and information about your transactions with us or our business partners, including the products and services provided to you though or by our business partners through the use of our platform.

If you utilise our platform, we may use technology to collect information as to your activities, including the IP address of your computer (or other devices), your browsing history on our platform and transactional data including your product scanning, auction and payment history.

If you are an employee or contractor with *BT Connect*, we will collect the following information from you:

- contact information such as your name, email address, postal and residential address, phone numbers, country of residence, next of kin contact details;
- employee record information;
- identifying information such as: your photo, passport and residency details, date of birth, licence;
- CV, resume or application related information (including references);
- Tax, superannuation and payroll information;
- Background checks information (which may be obtained from you or third parties).

In general, we do not collect "sensitive information" (such as information about ethnic origin, religious or political views, health information etc) from you.

Credit card information

We do not store any credit card information obtained through our platform. We pass it onto our bank or where applicable, our supplier for processing. If you use Stripe, Apple Pay, Google Pay or After Pay to complete your transaction, your Personal Information or Personal Data (including credit card information) will be collected and used by those parties in accordance with their individual privacy policies, which are available on their websites for review.

Anonymity and pseudonymity

Due to the nature of the services we provide and the goods offered for sale on our platform, it is only practicable or reasonable for *BT Connect* to deal with you on a named basis. Your Personal Information or Personal Data may be required in order to provide you with our services or the products you purchase on our platform from our business partners, or to resolve any issue you may have.

Section II: How do we collect Personal Information and Personal Data?

BT Connect collects Personal Information or Personal Data directly from you when you submit it

via the platform operated by *BT Connect*.

We may also collect Personal Information or Personal Data from publicly available sources or third parties, such as via our business partners, where we are responsible for delivering goods directly to you, or social media platforms such as Facebook or Twitter.

Depending on the reason for requiring the information, some of the information we ask you to provide may be identified as mandatory or voluntary. If you do not provide the mandatory information or any other information we require in order for us to provide our services to you or the products you purchase on our platform from our business partners, we may be unable to provide our services to you in an effective manner, or at all.

If we collect details about you from someone else, we will, whenever reasonably possible, make you aware that we have done this and why unless: (a) the information has been provided by you on application to register or work with *BT Connect*, (b) such information is publicly available or (c) as otherwise required or authorised by law.

Unsolicited Personal Information or Personal Data

In the event that we collect unsolicited Personal Information or Personal Data from you, or a third party, in circumstances where we have not requested or solicited that information, and it is determined in the sole discretion of *BT Connect*, that the Personal Information or Personal Data is not required, we will destroy the information or ensure that it is de-identified. However, where such information or data relates to your engagement with or by *BT Connect* we may choose to keep that.

How to we hold your Personal Information or Personal Data?

Once we collect your Personal Information or Personal Data, we will either hold it securely and store it on infrastructure owned or controlled by us or with a third party service provider who has taken reasonable steps to ensure they comply with the Privacy Act.

Cookies and IP addresses

A cookie is a small amount of data, which may include a unique identifier. Cookies are sent to your browser from a website and stored on your device. We assign a different cookie to each device that accesses our website. We use cookies to recognize your device, monitor traffic patterns and trends, and provide you with a personalized experience on our sites. In most cases, cookies do not identify you personally but may identify your internet service provider or computer. For example, *BT Connect* does use cookies to identify repeat users and make it easier for you to navigate our site and where applicable, provide customer services to you. We do not share that information with third parties. You do not need to allow the use of cookies on our site, however, if

you reject cookies your ability to use some features of our site will be limited.

Some of our media partners may also use cookies on our site. We have no access to or control over these tracking technologies. This information is generally not personally identifiable and is analysed to determine user preferences and provide feedback so we can make improvements to our site.

Section III: How do we use Personal Information and Personal Data?

Use Details

BT Connect may use your Personal Information or Personal Data for the purposes for which it was initially collected or purposes related to such initial purpose if such purposes would be within your reasonable expectations. For example, to:

- provide you with our services and information in relation our business partners' products being sold via *BT Connect* (which may include warranty services, repairs and replacement of products and customer care plan services, promotions and competitions);
- delivery of products procured via *BT Connect* and to respond to questions in relation to those products and the transaction to which they relate;
- forecast your future needs for our business partners' products;
- keep a record of our dealings with each other and enable us to contact you when necessary;
- develop a data profile to enable us to tailor our services to you;
- marketing products and services of our business partners to you that *BT Connect* considers may be of interest to you;
- in the sale of any part of *BT Connect's* business or a company owned by *BT Connect*; or
- (where applicable) conduct promotions in which you participated.
- Where you are a contractor or an employee of *BT Connect*, your Personal Information or Personal Data may be used to:
 - addressing your suitability for a role;
 - for the purposes of administration and performance monitoring uses; or
 - in the sale of any part of *BT Connect's* business or a company owned by *BT Connect*.

We may also use your Personal Information and Personal Data for purposes authorised by laws

or regulations, such as to prevent or investigate an alleged crime or fraud (and we are not required to seek your further consent).

Furthermore, *BT Connect* may also use or disclose your Personal Information or Personal Data, and we are not required to seek your further consent:

- when it is disclosed or used for a purpose related to the primary purposes of collection (detailed above), and you would reasonably expect your Personal Information or Personal Data to be used or disclosed for such a purpose;
- if we reasonably believe that the use or disclose is necessary to lessen or prevent a serious or imminent threat to an individual's life, health or safety or to lessen or prevent a threat to public health or safety;
- if we have reason to suspect that unlawful activity has been, or is being engaged in; or
- if it is required or authorised by law.

Procedures

In the event that we propose to use or disclose your Personal Information or Personal Data other than for reasons set out above, we will first notify you and seek your consent to such disclosure or use. Your Personal Information or Personal Data is only disclosed to organisations or parties for purposes of us providing you with products or services from our business partners. We take such steps as a reasonable to ensure that these organisations or parties are aware of the provisions of this Privacy Policy in relation to your Personal Information or Personal Data.

Section IV: Direct marketing

BT Connect may also, from time to time, use your Personal Information or Personal Data to contact you to identify promotions, competitions, products and services offered by our business partners that may be of interest to you.

Consent

By supplying us your information, you provide us with your express and informed consent to communicate with you via email, SMS, MMS, social media or post to inform you about products and services offered by us or our business partners which we consider are relevant to you (**Direct Marketing Communications**).

Without limitation to the preceding paragraph, if you have provided, inferred or implied consent (i.e. not opting out where an opt-out opportunity has been provided to you) or if it is within your reasonable expectation that we send you Direct Marketing Communications given the transaction

or communication you have had with us, then we may also use your Personal Information or Personal Data for the purpose of sending you Direct Marketing Communications which we consider may be of interest to you.

Communications opt-out

This permission is not limited in time unless you choose to opt out by contacting us using the contact information provided below, or by utilising an 'unsubscribe' facility on a communication we send to you in which case, *BT Connect* will take steps to ensure you do not receive any future such Direct Marketing Communication.

Some business partners of *BT Connect* advertise with Google. Google may show you these advertisements based on your previous visits to our site. If you do not wish to see these advertisements you can opt-out by visiting the Google advertising opt-out page here:

<https://policies.google.com/technologies/ads>

Section V: Disclosure of Personal Information or Personal Data

We will never sell, rent, lease or disclose your Personal Information or Personal Data to other organisations, except as outlined in this Privacy Policy. Personal Information or Personal Data provided to a member of the *BT Connect* group of companies may be shared within the *BT Connect* companies within the group. In addition, we may disclose your Personal Information or Personal Data to organisations outside *BT Connect* such, as our business partners and others, which assists us to deliver products and services procured via our platform. These third parties are too numerous to list and will change from time to time. Some examples of the types of such organisations may include, but are not limited to:

- the business partners who utilise our *BT Connect* platform;
- our business partners and Related Bodies Corporate (as defined in the *Corporations Act 2001* (Cth)) being the product and service suppliers to you and their delivery partners;
- financial services providers, such as our banks or third-party suppliers for securing payment of the products or services provided to you via our platform, such as Apple Pay, PayPal, Google Pay, Stripe and After Pay, and where applicable credit report agencies or debt collectors;
- technology service providers, such as internet service providers, database management services, digital mail providers who send communications on our behalf, live help service providers and service providers for the prevention of fraud and protection of data;
- service providers who perform market research or manage or review the services

provided to you;

- mailing systems and courier companies, which organise delivery of the products you have purchased via the platform; and
- our professional advisers, accountants, lawyers and auditors;
- third parties in connection with the sale of any part of *BT Connect's* business or a company owned by BT Connect;
- as required or authorised by law;
- (in addition to the above) in the case you are engaged by *BT Connect* as a contractor or employee, to Government departments, superannuation companies, worker's compensation organisations, third party referees; recruitment agents, financial institutions for payroll purposes.

Section VI: Cross border disclosure

BT Connect's servers are located in Australia, and so when we are storing your Personal Information or Personal Data we only store it in Australia.

The third parties (including our IT service providers) listed above that we utilise to assist us and our business partners in providing products and services to you, may be located in Australia or overseas. As we use service providers and platforms which can be accessed from various countries via an Internet connection, it is not always practicable to know where your information may be held. If your information or data is stored in this way, disclosures may occur to destination outside Australia, including (but not limited to) the United States or other countries.

Informed consent

By submitting your Personal Information or Personal Data to *BT Connect*, you expressly agree and consent to the disclosure, transfer, storing or processing of your Personal Information or Personal Data outside of Australia. In providing this consent, you understand and acknowledge that countries outside Australia do not always have the same privacy protection obligations as Australia in relation to Personal Information or Personal Data. However, we will take steps to ensure that your information is used by third parties securely and in accordance with the terms of this Privacy Policy.

The Privacy Act requires us to take such steps as are reasonable in the circumstances to ensure that any recipients of your Personal Information or Personal Data outside of Australia do not breach the privacy principles contained within the Privacy Act. By providing your consent, under the Privacy Act, we are not required to take such steps as may be reasonable in the circumstances. However, despite this, we acknowledge the importance of protecting Personal

Information or Personal Data and have taken reasonable steps to ensure that your information is used by third parties securely and in accordance with the terms of this Privacy Policy.

If you do not agree to the disclosure of your Personal Information or Personal Data outside Australia by *BT Connect*, you should (after being informed of the cross border disclosure) tell *BT Connect* that you do not consent. To do this, either elect not to submit the Personal Information or Personal Data to *BT Connect* after being reasonably informed in a collection notification or please contact us via the details set out at in Section X below.

Section VII: Data Security and Quality

BT Connect takes reasonable steps to ensure that your Personal Information or Personal Data is protected from misuse, interference or loss and unauthorised access, modification or disclosure. We have systems and procedures in place to protect your privacy whenever we collect, store, and use or disclose Personal Information or Personal Data. We will regularly upgrade these systems and review our procedures to ensure high standards of security are used to protect your Personal Information or Personal Data. As a condition of working for *BT Connect* all our employees and service providers sign up to express confidentiality obligations. However, since no system is 100% secure or error free, we cannot guarantee that your Personal Information or Personal Data is totally protected, for example, from hackers or misuse. If you enter Personal Information or Personal Data on our platform, you should exercise due care to safeguard any passwords, ID number, or other special access features associated with your use of our platform.

We will take reasonable steps to destroy or permanently de-identify Personal Information or Personal Data from our systems which is no longer required by us.

Section VIII: How to access and amend Personal Information or Personal Data

We strive to keep your Personal Information and Personal Data accurate, up-to-date and complete. You are entitled to find out what information we hold about you and correct that information if it is wrong, incomplete, out of date, misleading or irrelevant.

If you become aware that any information we hold about you is incorrect or out-of-date, please let us know immediately via the contact details set out below at section 9. We will be happy to accept updated Personal Information or Personal Data in writing from the owner of that information at any time. However, in order to protect your privacy and security, we will take reasonable steps to verify your identity before granting you access or enabling you to make corrections to your Personal Information or Personal Data.

Our objective is to respond to any request within a reasonable timeframe and no later than 30 days. We will inform you if this timeframe is not achievable.

In some circumstances, *BT Connect* may not be in a position to grant access to Personal Information or Personal Data, such circumstances include:

- providing access is likely to pose a serious threat to the safety of an individual or the public;
- providing access is likely to unreasonably impact on the privacy of others;
- the request for access is frivolous or vexatious;
- providing access would reveal information which relates to existing or anticipated legal proceedings or otherwise impact on any negotiations;
- providing access is unlawful (including being unlawful as directed by a court or tribunal order) or is likely to impact on actions being taken in relation to alleged unlawful activities relating to the functions and activities of *BT Connect*; or
- granting access would impact on a commercially sensitive decision-making process.

Section IX: Complaints

We encourage and value your feedback. If you have any questions about our Privacy Policy, or have a problem or complaint, please let us know. We will respond to a complaint as soon as possible, but within 5 Business Days to let you know who is responsible for managing your complaint. We will also try to resolve the complaint within 10 Business Days. When this is not possible, we will contact you within that time to let you know how long it will take to resolve the complaint.

In order to resolve a complaint, we:

- will liaise with you to identify and define the nature and cause of the complaint;
- may request that you provide the details of the complaint in writing;
- will keep you informed of the likely time within which we will respond to your complaint; and
- will inform you of the legislative basis (if any) of our decision in resolving such complaint.

Our contact details are:

Promontory Point Pty Ltd

412/2 Point Street
PYRMONT NSW 2009
Attention: Privacy Officer
E-mail: admin@betterthatconnect.com

If you believe *BT Connect* has not adequately dealt with your complaint, you may complain to the Privacy Commissioner, whose contact details are found at www.oaic.gov.au.

We will keep a record of the complaint and any action taken in a Register of Complaints.

Section X: GDPR

Definitions

In providing our or our business partners' products and services, or collecting and using your Personal Data, we are required to comply with the GDPR where you are a European Union resident.

The following defined terms have the associated meanings:

- **"Data Subject"** has the meaning attributed to that term in the GDPR.
- **"GDPR"** means Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC; and
- **"Personal Data"** means the Personal Data (having the meaning attributed to that term in the GDPR) of the Data Subjects whose data is processed for the purposes of the provision of our retail services.

GDPR Obligations

If you are a resident of the European Union for the purposes of the GDPR, then in addition to what is set out in Sections 1 - 9 above, the following applies to you.

Under the GDPR, *BT Connect* is considered a "data processor" in the provision of its platform that facilitates the buying and selling of retail goods and services.

In addition to your rights of access and correction as set out above, as a Data Subject you may:

- **(access)** request access to your Personal Data held by *BT Connect*;
- **(rectification)** request to update or rectify any of the Personal Data that we hold about you by contacting us at the details specified above and request Personal Data updates;
- **(erasure)** withdraw your consent to *BT Connect*'s use of your Personal Data as described in this policy by deletion or erasure of your Personal Data that we hold where that data is no longer required for the purpose for which it was collected;
- **(restriction on processing)** obtain from the controller (usually, this is your employer) a restriction on processing of your Personal Data where:
 - accuracy of the Personal Data is contested;
 - the processing by the processor is unlawful (and you oppose erasure but request restriction of use);
 - *BT Connect* no longer needs your Personal Data; or
 - you have objected to processing pursuant to your right to object under Article 21(1) of the GDPR;
- **(data portability)** request that *BT Connect*:
 - provides you with a copy of the Personal Data that *BT Connect* holds about you in a portable and machine readable form; or
 - share your Personal Data with a nominated third party.

Exercising Data Subject rights

If you wish to exercise any of your Data Subject rights, then please send your request in writing to the details above in this section.

We will process your request promptly and in any event, within one month of receipt of receiving it.

Complaints

If you have any concerns in relation to *BT Connect*'s collection or processing of your Personal Data, then you also have a right to complain to a supervisory authority (within the meaning of the GDPR).

Section XI: Consent and changes in this Privacy Policy

Modifications and updates

We reserve the right to modify this Privacy Policy at any time, so please review it frequently. Changes to this Privacy Policy will be published by posting an updated Privacy Policy on the *BT Connect* platform. If we make material changes to this policy, we will notify you here, by email, or by means of a notice on our home page.

Interaction of this policy with contracts

This Privacy Policy is a compliance document, rather than a legal contract between two or more persons. However, certain contracts may incorporate all, or part of this Privacy Policy, into the terms of that contract. In such instances, *BT Connect* may incorporate the terms of this policy such that certain sections or parts are incorporated, and the consents provided by this policy become contractual terms provided by the other party to the contract.

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