

# **Last K Ventures Pty Ltd**

## **Privacy Policy for Groundfloor™ System Users**

In this Privacy Policy, 'us' 'we' or 'our' means Last K Ventures Pty Ltd (ACN 613 910 571), operating as Groundfloor™. We are committed to respecting your privacy. Our Privacy Policy sets out how we collect, use, store and disclose your personal information.

By providing personal information to us, you consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy and any other arrangements that apply between us. We may change our Privacy Policy from time to time by publishing changes to it via the mobile app.

### **What personal information do we collect?**

We collect your name, your email address, your telephone number and other contact details, and other personal information that we may request in order to facilitate your dealings with us. We collect information when you register to use our service and when you interact with us via our mobile app.

### **Can you engage with us in an anonymous or pseudonymous manner?**

Under Australia's privacy laws, where it is lawful and reasonable to do so, you may deal with us on an anonymous or pseudonymous basis. However, if you choose to interact with us in an anonymous or pseudonymous fashion, or you do not provide us with the personal information we request, then we may be unable to provide you with the services that you request.

### **Why do we collect, use and disclose personal information?**

We may collect, hold, use and disclose your personal information for the following purposes:

- to enable you to access and use our mobile app and lockers;
- to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you; and
- to comply with our legal obligations, resolve any disputes that we may have with any of our users, and to fulfil and enforce our contracts and agreements relating to our services.

### **Do we use your personal information for direct marketing?**

We do not disclose or sell your personal information for direct marketing.

### **To whom do we disclose your personal information?**

We may disclose personal information for the purposes described in this privacy policy to:

- our employees and related bodies corporate;
- our software partner (please see further information below);
- the owner and/or operator of the building in which the Groundfloor™ lockers are located, and their authorised employees;
- professional advisers, dealers and agents;
- specific third parties authorised by you to receive information held by us; and/or
- other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

### **Disclosure of personal information outside Australia**

In order to provide our services to you, we may disclose personal information to our software partner based in Singapore.

When you provide your personal information to us, you consent to our disclosure of your information to our software partner based in Singapore and you acknowledge that we are not required to ensure that our partner handles that personal information in compliance with Australian Privacy Law. We will, however, take reasonable steps to ensure that our partner will deal with such personal information in a way that is consistent with the Australian Privacy Principles.

### **Security**

We may hold your personal information in either electronic or hard copy form. We take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure. We use physical, administrative, personnel and technical measures to protect your personal information. However, we cannot guarantee the security of your personal information.

### **Accessing or correcting your personal information**

We encourage you to update us regularly with your personal information to ensure that we hold information about you that is up-to-date, accurate and complete. You can request access to the personal information we hold about you by using the details below. Sometimes, we may not be able to provide you with access to all your personal information and, where this is the case, we will tell you why in writing. Some of the circumstances where we may refuse access to or correct your personal information is where access to or correction of information would have an unreasonable impact on the privacy of others, the information relates to existing or anticipated legal proceedings (and the information would not be discoverable in those proceedings), giving access would be unlawful or the request for access is frivolous or vexatious. We may also need to verify your identity when you request your personal information. While there is no cost for requesting access to or correction of your information, we reserve the right to charge a fee to cover our cost in collating, copying and providing information to you. We will endeavour to notify you of the fee before giving you access to the information.

### **Contact us**

For further information about our Privacy Policy or practices or to make a complaint about the way we have handled your personal information, please contact the Director of our Customer Service Team at:

- (a) postal address: Level 27, 101 Collins Street, Melbourne VIC 3006; or
- (b) email: [ask@groundfloordelivery.com](mailto:ask@groundfloordelivery.com)

Please include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint in the timeframe required by law. We may request further information from you regarding your complaint to assist us in investigating and resolving your complaint. If you think that we have failed to resolve the complaint satisfactorily, you may escalate the complaint to the Office of the Australian Information Commissioner.

**Effective:** March 2020