

PRIVACY POLICY

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Sixthree Holdings Pty Ltd (“Alkasa”, “we” or “us” or “our”) registered in Australia with the ACN 647 162 972 is the data controller and operator of the Alkasa mobile application and alkasa.com.au.

Alkasa is committed to your privacy. This privacy policy explains our collection, use, disclosure, retention, and protection of your personal information.

Scope

This privacy policy is applicable to all Alkasa websites, applications, services, or tools (collectively “Services”), regardless of the method of access or usage, including via mobile devices.

You are contracting with Alkasa (the data controller) who is responsible for the collection, use, disclosure, retention and protection of your personal information in accordance with our privacy standards, this privacy policy, as well as any applicable national laws. Alkasa may transfer data to other members of the Alkasa corporate group, as described in this privacy policy.

We may amend this privacy policy at any time by posting the amended version on this site including the effective date of the amended version.

Personal Information We Collect

Definition of Personal Information:

Personal Information refers to data concerning an identified or identifiable natural person. An identifiable natural person is one who can be directly or indirectly identified, by reference to an identifier such as a name, an identification number, location data, an online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

We do not consider personal information to include data that has been anonymized or aggregated in such a way that it can no longer be used to identify a specific natural person, either in conjunction with other information or otherwise.

We collect personal information from you when you utilise our Services.

We collect personal information from you and any devices (including mobile devices) you use when you: use our Services, register for an account with us, provide us information on a web form, update or add information to your account, participate in community discussions, chats, or dispute resolution or when you otherwise correspond with us.

Some of this personal information, such as a way to identify you, is necessary to enter into our [Terms of Use](#). The provision of all other personal information is voluntary, but may be necessary in order to use our Services, such as the offer details or contact information needed to post an ad.

We may also collect personal information from other sources, as described below.

Personal information you give us when you use our Services or register for an account with us:

- Identifying information such as your name, addresses, telephone numbers or email addresses when you register for an account with us.
- Information you provide when interacting with an ad or other transaction-based content that you generate or that is connected to your account as a result of a transaction you are involved in.
- Other content that you generate, or that is connected to your account and your use of our Services such as your use of the following website functions: My Alkasa (Messages, Favourites, Saved Searches, My Favourites, My Preferences, My Details, Create Account, Ratings and Reviews) or the Help section.
- Financial information (such as credit card or bank account numbers) in connection with a transaction.
- In some instances, when you use our Services, you may provide age, gender, interests and favourites.
- You may also provide us other information through a web form, by updating or adding information to your account, through your participation in community discussions, chats, dispute resolution, or when you otherwise communicate with us regarding our Services.
- Additional information we are required or authorized by applicable laws to collect and process in order to authenticate or identify you or to verify the information we have collected.

Personal information we collect automatically when you use our Services or register for an account with us:

- We collect information about your interaction with our Services, your advertising preferences, and your communications with us. This is information we receive from devices (including mobile devices) you use when you access our Services. This information could include the following: Device ID or unique identifier, device type, ID for advertising, and unique device token.
- Location information, including location information from your mobile device. Please note that most mobile devices allow you to control or disable the use of location services by any application on your mobile device in the device's settings menu.
- Computer and connection information such as statistics on your page views, traffic to and from the sites, referral URL, ad data, your IP address, your browsing history, and your web log information.

Personal information we collect using cookies and similar technologies:

- We use cookies, web beacons, unique identifiers, and similar technologies to collect information about the pages you view, the links you click, and other actions you take when using our Services, within our advertising or email content.
- For more information about our use of these technologies, and how to control them, see our [User Cookie Notice](#).

Personal information collected from other sources:

- We supplement the personal information we collect directly with information collected from third parties and add it to your account information. For example, we collect and use demographic and other information that is publicly available in an applicable jurisdiction, additional contact information, credit check information, and information from credit bureaus, as allowed by applicable laws.
- **Social Media.** We allow you to share information with social media sites, or use social media sites to create your account or to connect your account with the respective social media site. Those social media sites may give us automatic access to certain personal information retained by them about you (e.g., content viewed by you, content liked by you, and information about the advertisements you have been shown or have clicked on, etc.). You control the personal information you allow us to have access to through the privacy settings on the applicable social media site and the permissions you give us when you grant us access to the personal information retained by the respective social media site about you. By associating an account managed by a social media site with your account and authorising us to have access to this information, you agree that we can collect, use and retain the information provided by these social media sites in accordance with this privacy policy. We may also use plug-ins or other technologies from various social media sites. If you click on a link provided via a social media plug-in, you are voluntarily establishing a connection with that respective social media site.
- If you give us personal information about someone else, you must do so only with that person's authorisation. You should inform them how we collect, use, disclose, and retain their personal information according to our privacy policy.

How We Use Your Personal Information

We utilise your personal information to deliver and enhance our services, personalise your experience on our platforms, communicate with you regarding your account and our services, provide customer support, deliver personalised advertising and marketing, and identify, prevent, mitigate, and investigate fraudulent or unlawful activities.

We use the personal information we collect from you for a range of different business purposes and according to different legal bases of processing. The following is a summary of how and according to which legal bases we use your personal information.

We use your personal information to fulfill an agreement with you and provide you with our Services, to comply with our legal obligation, protect your vital interest, or as may be required for the public good. This includes:

- To provide access to and use of our Services, account management, operate, measure and improve our Services, keep our Services safe, secure and operational, and customise site content that includes items and services that you may like in response to actions that you take.
- To give you access to your internal messages and other features.
- To contact you regarding your account, to troubleshoot problems with your account, to resolve a dispute, to collect fees or monies owed, or as otherwise necessary to provide you customer service.
 - When contacting you for such purposes as outlined above, we may contact you via email, telephone, SMS/text messages, postal mail, and via mobile push notifications.
- To provide other services requested by you as described when we collect the information, including displaying a location with your ad via Google Maps (for more information see the [Google Privacy Notice](#)).
- We use general location information to provide you with location-based services (such as advertising, search results, and other personalised content).
- To prevent, detect, mitigate, and investigate fraud, security breaches or other potentially prohibited or illegal activities.
- To enforce our [Terms of Use](#), this privacy policy, or other policies, applicable laws, and any agreement we may have with you.

We use your personal information to pursue our legitimate interests where your rights and freedoms do not outweigh these interests. We have implemented controls to balance our interests with your rights. This includes to:

- Improve our Services, for example by reviewing information associated with stalled or crashed pages experienced by users allowing us to identify and fix problems and give you a better experience.
- Personalise, measure, and improve our advertising based on your advertising customisation preferences.
- Contact you via email, postal mail or telephone in order to offer you coupons, discounts and special promotions, poll your opinions through surveys or questionnaires and inform you about our Services, as authorised by applicable law.
- Contact you about public policy matters, or other current events, related to your ability to use our Services.
- Deliver targeted marketing, service updates, and promotional offers based on your communication preferences.
- Measure the performance of our email marketing campaigns (e.g. by analysing open and click rates).
- Monitor and improve the information security of our site and mobile applications.

With your consent, we may use your personal information to:

- Provide you with marketing via telephone calls, email, SMS or text.
- Provide you with marketing from other corporate group companies.
- Provide you with marketing from third parties.
- Customize third party advertising you might see on third party websites.
- Use your precise geo-location to provide location-based services.

You have the right to withdraw your consent at any time.

We may use technologies considered automated decision making or profiling. We will not make automated decisions about you that would significantly affect you, unless such a decision is necessary as part of a contract we have with you, we have your consent, or we are required by law to use such technology.

Your Choices Regarding How We Use Your Personal Information

You have options regarding how we employ your personal information to communicate with you, provide you with marketing material, tailor relevant advertising, and whether you wish to remain logged into your account.

Communication preferences

You can control the methods by which we may contact you in My Profile. There, you can also choose which newsletters and promotions you want to receive.

Marketing

If you do not wish to receive marketing communications from us, you can unsubscribe via the link in an email you received, change your marketing preferences in My Profile, indicate your communication preferences using the method described within the direct communication from us or contact us as described in the Contact Us section below. Keep in mind, we do not sell, rent, or otherwise disclose your personal information to third parties for their marketing purposes without your consent.

Advertising

If you do not wish to participate in our advertising personalisation programs, you can opt-out by following the directions provided within the applicable advertisement, or through the programs described in our [User Cookie Notice](#). The effect of an opt-out will be to stop personalised advertising, but it will still allow the collection of personal information as otherwise described in this privacy policy. We do not allow third parties to track or collect your personal information on our sites for their own advertising purposes, without your consent.

Staying Signed in

When you sign into your account within the App, you stay signed in. If you use our website (including through a mobile device), you will stay signed in for a certain period of time. If you are using a public or shared computer, we encourage you to sign out at the end of your session. You or any other user of the computer/browser you signed in on will be able to view and access most parts of your account and take certain specific actions during this signed in period without any further authorisation. The specific actions and account activities that you or any other user of this computer/browser may take include:

- Listing an ad
- Manage your ads

- Apply for or unsubscribe from our Services
- View the profile page
- Send messages to Alkasa from your account

If you attempt to change your password, update any other account information or attempt other account activity beyond those listed above, you may be required to enter your password.

You can typically end your signed in session by either signing out and/or clearing your cookies. If you have certain browser privacy settings enabled, simply closing your browser may also end your signed in session. If you are using a public or shared computer, you should sign out and/or clear your cookies when you are done using our Services to protect your account and your personal information.

Ways you can Access, Control, and Rectify Your Personal Information

We respect your right to access, rectify, request deletion, or request limitations on our usage of your personal information as required by applicable law. We also take measures to ensure the accuracy and currency of the personal information we collect.

You have the right to know what personal information we possess about you:

- We will furnish you with a copy of your personal information in a structured, commonly used, and machine-readable format upon request.
- If your personal information is inaccurate or incomplete, you have the right to request its correction.
- You have the right to object to our processing of your personal information.
- Additionally, you can request the deletion or restriction of how we use your personal information; however, this right is subject to applicable law and may affect your access to some of our Services.

Access, correction, and deletion of your personal information:

You can see, review and change most of your personal information by signing into your account. Please, update your personal information immediately if it changes or is inaccurate. Keep in mind, once you make a public posting, you may not be able to change or remove it.

We will honour any statutory right you might have to access, modify or erase your personal information. To request access and to find out whether any fees may apply, if permitted by applicable laws, please contact us following the instructions in the Contact Us section below. Where you have a statutory right to request access or request the modification or erasure of your personal information, we can still withhold that access or decline to modify or erase your personal information in some cases in accordance with applicable laws.

If you request that we stop processing some or all of your personal information or you withdraw (where applicable) your consent for our use or disclosure of your personal

information for purposes set out in this privacy policy, we might not be able to provide you all of the Services and customer support offered to our users and authorised under this privacy policy and our [Terms of Use](#).

Upon your request, we will close your account and remove your personal information from view as soon as reasonably possible, based on your account activity and in accordance with applicable laws.

Sharing Your Personal Information

We may disclose your personal information to other entities within the Sixthree Holdings Pty Ltd corporate structure or to third parties. Such disclosure may be necessary to grant you access to our Services, fulfill our legal obligations, enforce our Terms of Use, facilitate our marketing and advertising efforts, or identify, prevent, mitigate, and investigate fraudulent or unlawful activities related to our services. We endeavour to limit the disclosure of personal information to what is directly relevant and essential for the intended purpose. We do not sell, lease, or otherwise divulge your personal information to third parties for their marketing and advertising purposes without your consent.

We may disclose your personal information to the following parties for the following purposes:

Corporate group members, who may use it to:

- Provide joint content and services (like registration, transactions, and customer support)
- Help detect, investigate, mitigate and prevent potentially fraudulent and illegal acts, violations of our Terms of Use, and data security breaches.
- Provide you personalised advertising.
- Improve their products, sites, applications, services, tools, and marketing communications.
- Members of our corporate group will use your personal information to send you marketing communications only if you have consented to receive such communications from them or if otherwise permitted by law.

Service Providers and financial institutions partners as follows:

- Third party service providers who help us to provide our Services, payment processing services, assist us in providing customize advertising, to assist us with the prevention, detection, mitigation, and investigation of potentially illegal acts, violations of our Terms of Use, fraud and/or security breaches, bill collection, affiliate and rewards programs and other business operations.
- Third party financial institutions with whom we partner to offer financial products to you, for them to provide joint content and services (such as, registration, transactions and customer support). These third-party financial institution partners will use your personal information to send you marketing communications only if you have requested their services.

Third party providers of websites, applications, services and tools and corporate group members:

- With whom we partner so that they can publish or advertise your listings and their content on their websites or in their applications, services and tools. If we transfer personal information along with the content of your listings to third party providers, this will be solely on the basis of an agreement limiting use by the third-party provider of such personal information to processing necessary to fulfil their contract with us and obligating the third-party provider to take security measures with regard to such data. Third party providers are not permitted to sell, lease or in any other way transfer the personal information included in your listings to third parties.

Law enforcement, legal proceedings, and as authorised by law:

- To comply with our legal requirements, enforce our Terms of Use, respond to claims that a listing or other content violates the rights of others, or protect anyone's rights, property or safety.
- To law enforcement or governmental agencies, or authorized third-parties, in response to a verified request or legal process relating to a criminal investigation or alleged or suspected illegal activity or any other activity that exposes us, you, or any other of our users to legal liability. We will only disclose information we deem relevant to the investigation or inquiry, such as name, city, state, postcode, telephone number, email address, User ID history, device ID, IP address, fraud complaints, offers and listing history.
- To credit agencies or bureaus as authorized by applicable national laws (e.g. information on late or missed payments or other defaults on your account that may be reflected in your credit report or file).
- To third parties involved in a legal proceeding, if they provide us with a subpoena, court order or substantially similar legal basis, or we otherwise believe in good faith that the disclosure of information is necessary to prevent imminent physical harm or financial loss or to report suspected illegal activity.

Change of Ownership:

If we are subject to a merger or acquisition with/by another company, we may share information with them in accordance with our global privacy standards. Should such an event occur, we will require that the new combined entity follow this privacy policy with respect to your personal information. If we intend to handle your personal information for any purposes not covered in this privacy policy, you will receive prior notification of the processing of your personal information for the new purposes.

International Data Transfers:

We will only transfer your personal data to third countries, i.e. countries outside Australia, on the basis of appropriate safeguards.

Retention Period for Your Personal Information

We retain your personal information for the duration necessary to provide the Services you have requested, or for other essential purposes such as compliance with legal obligations, resolution of disputes, and enforcement of our policies.

Our specific retention times for personal information are documented in our records retention schedules. How long we retain personal information can vary significantly based on context of the Services we provide and on our legal obligations. The following factors typically influence retention periods:

- *How long is the personal information needed to provide our Services?* This includes such things as maintaining and improving the performance of our products, keeping our systems secure, and maintaining appropriate business and financial records. This is the general rule that establishes the baseline for most of our data retention periods.
- *Is the personal information sensitive?* If so, a shortened retention time is generally appropriate.
- *Have you provided consent for a longer retention period?* If so, we will retain data in accordance with your consent.
- *Are we subject to a legal, contractual, or similar obligation to retain your personal information?* Examples can include mandatory data retention laws in the applicable jurisdiction, government orders to preserve data relevant to an investigation, or personal information retained for the purposes of litigation.

After it is no longer necessary for us to retain your personal information, we will dispose of it in a secure manner according to our data retention and deletion policies.

Cookies & Similar Technologies

When you visit or interact with our platforms, services, applications, tools, or communication channels, we or our authorised service providers may employ cookies and similar technologies to enhance your experience, provide a more efficient and secure environment, and for advertising and marketing purposes. You may refer to our comprehensive [User Cookie Notice](#) for further details.

How We Protect Your Personal Information

We employ technical and administrative security measures to safeguard your personal information, reducing the risks of loss, misuse, unauthorised access, disclosure, and alteration. Our protective measures include firewalls, data encryption, physical access controls at our data centres, and authorisation controls for information access. If you suspect misuse of your account, please contact us using the methods in the 'Contact Us' section of this privacy policy.

Additional Privacy Information

This section outlines supplementary privacy details related to your use of our Services, which you may find valuable.

When you share your personal information on our sites or applications – what happens?

Other users have access to the information you share on Alkasa. For example, other users can see your ratings, reviews and associated comments. Other users can also see any information you chose to share in your profile.

When you use our Services, your public user ID may be displayed and available to the public and associated with all your public Alkasa activity. Notices sent to other users about suspicious activity and notice violations on our sites may refer to your public user ID and specific items. If you associate your name with your user ID, the people to whom you have revealed your name may then be able to identify your Alkasa activities.

Your responsibilities over information you receive on Alkasa

When you correspond with another user and receive personal information of the other user (such as their name, email address, contact details, shipping and billing address) you are, independent from us, the controller of such data and you must comply with the applicable privacy laws.

You may use the personal information that you have access to only for Alkasa transaction-related purposes, or for other services offered through Alkasa (such as fraud complaints, and member-to-member communications), and for purposes expressly consented by the user to whom the information relates. Using personal information of other users that you have access to for any other purpose constitutes a violation of our [Terms of Use](#).

Unwanted or threatening email

We do not tolerate abuse of our Services. You do not have permission to add other users to your mailing list (email or postal), call, or send him/her text messages for commercial purposes, even if this user purchased something from you, unless the user has given his/her explicit consent. Sending unwanted or threatening email and text messages is against our Terms of Use. To report Alkasa-related spam or spoof emails please contact us.

Communication tools

We may scan messages automatically and check for spam, viruses, phishing and other malicious activity, illegal or prohibited content or violations of our Terms of Use, this privacy policy or our other policies.

Children's Privacy

Our websites are general audience websites and not intended for children. We do not knowingly collect personal information from users deemed to be children under their respective national laws.

Third Party Privacy Practices

This privacy policy addresses only our use and handling of personal information we collect from you in connection with providing you our Services. If you disclose your information to a third party or visit a third-party website via a link from our Services, their privacy policies

and practices will apply to any personal information you provide to them or they collect from you.

We cannot guarantee the privacy or security of your personal information once you provide it to a third party and we encourage you to evaluate the privacy and security policies of your trading partner before entering into a transaction and choosing to share your personal information.

Contact Us

For inquiries or complaints concerning this privacy policy or our data handling practices, please contact us [here](#).

You can also reach us via email at info@alkasa.com.au.

Your right to lodge complaints with a data protection supervisory authority remains unaffected.