

OUR SHARED HOMES PTY LTD – PRIVACY POLICY

Our Shared Homes Pty Ltd (ABN 72 695 358 840) (**we, us or our**) is committed to protecting your privacy. This policy explains how we collect, use and protect your personal information. It applies to all personal information we handle, whether we collect it through our website, in person, or through other means.

Quick overview

- We collect information you provide to us and information we gather when we interact with you
- We use this information to provide our services and improve your experience
- We protect your information using secure systems and processes
- You have rights regarding your personal information, including access and correction rights

Information we collect

Identity and contact details

- Name, address, email address and phone number
- Government-issued identification documents (passport, driver's licence)
- Biometric data (facial recognition data collected through our identity verification process)

Property and exchange information

- Property addresses and location details (including residential properties and land)
- Property and land photos and images
- Property and land descriptions, amenities and house rules
- Availability calendars and booking details
- Exchange and platform information
- Communications between members through the platform
- Exchange arrangements and booking details
- OSH credits balance and transaction history
- Exchange history and preferences
- Reviews and ratings

Service related information

- Payment and transaction details for products and services you've purchased from us or enquiries about our products and services
- Your preferences for our services and your marketing preferences
- Feedback and survey responses

Digital information

- IP address and general location information derived from your IP address
- Search and browsing behaviour
- Website usage patterns
- Cookie preferences

Professional information (for job applicants and workers)

- Employment history
- Professional experience
- Required authorisations and licences
- Professional registrations

Sensitive Information

We handle sensitive information with extra care and protection, and we only collect this information with your consent or when legally permitted. This includes:

Biometric information

- Facial recognition data (collected through our identity verification process to verify your identity and ensure platform security)
- Government identification documents (to verify your identity before you can use our platform)

How we collect personal information

- **Directly from you when you:** interact with us, contact us, fill out forms.
- **Automatically when you:** visit our website, use our technologies, interact with our online services.
- **From third parties:** service providers, business partners, public sources, government organisations and organisations or people authorised by you.

Why we collect, hold, use and disclose personal information

We collect and use your personal information to run our business and provide our services as set out below.

Business operations

- To manage our relationship with you as a customer or supplier
- To verify your identity and ensure platform security
- To administer OSH credits, including processing credit transactions, maintaining balances and tracking credit history
- To process and deliver our products and services
- To handle your inquiries, support requests, and communications
- To maintain accurate records for billing and administration
- To verify your identity through biometric verification before you can access our platform

Communication and support

- To respond to your questions and support requests
- To communicate important updates about our services
- To handle inquiries made through our website or platforms
- To manage your participation in surveys, feedback sessions, or events

Service improvement

- To conduct analytics and market research
- To improve our business operations and services

- To develop and enhance our applications and platforms
- To understand how our services are used

Marketing and promotions

- To send you promotional information about our services and events
- To inform you about products or services that may interest you
- To manage your marketing preferences
- To run competitions, promotions, and special offers
- To provide additional benefits to our customers

Employment purposes

- To assess employment applications
- To evaluate candidate qualifications
- To manage professional certifications and licences
- To maintain employment records

Legal and compliance

- To comply with our legal obligations
- To respond to court orders or legal processes
- To maintain required business records
- To fulfill regulatory requirements or reporting obligations
- To protect our legal rights and interests or as authorised by law

Platform safety and communications

To maintain a safe and secure platform, we may examine communications sent through our messaging system using both automated technology and, when required, human review. This helps us prevent fraud, investigate security issues, assess risks, meet our legal obligations, provide customer support, resolve disputes, and enforce our terms of service. We primarily rely on automated systems for this purpose. Human review only occurs when specifically needed, such as when a member reports a safety concern or we're investigating suspected fraudulent behaviour. We do not monitor your messages to send you marketing from other companies, and we do not sell or share your communications with third parties for their advertising purposes.

Member-to-member information sharing

You are responsible for any information you choose to share directly with other members through our messaging system. We strongly recommend against sharing sensitive access information such as entry codes, key safe combinations, alarm codes or security system details via digital messaging. We provide the messaging platform but do not control or monitor the information members share with each other. We have no liability for how members use, share or misuse information you voluntarily provide to them directly.

Our disclosures of personal information to third parties

We may disclose personal information to:

Service providers

- IT service providers
- Identity verification service providers

- Data storage providers
- Web hosting and server providers
- Payment processors. We do not collect or store your payment card details directly - these are processed and stored by our third-party payment processor in accordance with payment card industry security standards
- Marketing and advertising providers
- Analytics providers

Professional advisers

- Bankers
- Auditors
- Insurers and insurance brokers
- Legal advisers

Business partners

- Our existing or potential agents
- Our business partners or contractors

Corporate transactions

If we merge with or are acquired by another company, or sell our business assets:

- Your information may be disclosed to our advisers
- Your information may be disclosed to the potential purchaser's advisers
- Your information may be included in the transferred assets

Legal and regulatory bodies

- Courts and tribunals
- Regulatory authorities including as required for reporting obligations
- Law enforcement officers

Other parties

- Third parties you have authorised
- Other platform members. We may display certain information (such as your name, property details, property photos, house rules, availability, exchange history and reviews) to other members of our platform to facilitate home exchanges
- Emergency services when necessary
- Any other parties as required or permitted by law

Member to Member information sharing

When you confirm an exchange arrangement with another member, we will share your verified name, email address, phone number and property address with that member to facilitate the exchange. By using our Platform and confirming exchanges, you authorise us to share this information. Other Members may also be able to view certain profile information, property Listings (including photos, house rules, and availability) , exchange history, reviews and ratings you have posted on the Platform.

Identity verification services

We use third-party identity verification services to verify your identity as part of our account security and fraud prevention measures. When you complete identity verification, our verification provider collects information about you and your device, including through cookies, to provide verification, fraud detection, authentication and analytics services.

Our identity verification provider maintains and processes its own copy of your verification data for its own purposes, including fraud prevention and service improvement. They handle this information in accordance with their own privacy practices.

After successful verification, we retain only your verification status and your verified name. We do not retain copies of your identity documents. Your verified name may be shared with other members when you complete an exchange arrangement.

Third Party data retention

Third-party service providers (including identity verification and payment processors) retain and handle your personal information according to their own privacy policies and retention schedules, which are outside our direct control. We require our service providers to handle your information in accordance with privacy laws, but for specific details about how they collect, use and retain your information, please refer to their respective privacy policies.

Overseas disclosure

Storage and access

We store your personal information in Australia. However, your information may be accessed from or transferred to locations outside Australia in these circumstances:

- When our service providers are located overseas
- When we work with overseas business partners
- When using cloud-based services or data storage solutions

Our approach to overseas disclosure

Before disclosing your personal information overseas, we take reasonable steps to ensure that the recipient treats your information in accordance with applicable law by only sending what is necessary, requiring recipients to protect your information through contractual agreements which require the recipient to comply with the privacy standards in applicable law or through other mechanisms that provide comparable safeguards and by monitoring how recipients handle your information.

Your privacy rights and choices

Providing information

You can choose whether to provide personal information to us, however, if you don't provide certain information, we may not be able to provide some services.

Identity verification (including biometric data and government identification documents) is mandatory to create and maintain an account on our platform. Without completing identity verification, you will not be able to access our services.

For other information, let us know if you don't want to provide it and we will let you know when information is required versus optional.

Information provided by third parties

When we receive your personal information from another person or organization, we handle it according to this privacy policy. If you give us information about someone else, you confirm that you have their permission to share it with us and that they understand how we'll use it as described here.

Access to your information

You can request access to the personal information we hold about you and we will respond to your request within a reasonable time. We may charge a reasonable administrative fee for providing access and if we cannot provide access, we will explain why and explore alternative ways to share relevant information.

Correction rights

You can ask us to correct any information that is inaccurate, out of date, incomplete, irrelevant or misleading and we will take reasonable steps to correct your information promptly. If we cannot make the correction, we will explain why and discuss alternatives. You can ask us to add a statement to your information noting your requested correction.

Account and information deletion

You may request deletion of your account and associated personal information by contacting us using the details in this policy. Please note that we may need to retain certain information where we have a legal obligation to do so, or where retention is necessary to resolve disputes, enforce our agreements, or for other business or operational reasons. We will inform you if we are unable to fully delete your information and explain the reasons why.

Marketing communications

You can opt-out of receiving marketing communications at any time. Each marketing communication will include an unsubscribe option. You can change your marketing preferences by contacting us. We will process your request as soon as practicable.

How to contact us about your rights or to make a complaint and what happens next

Step 1: Contact our privacy officer

- Email: support@oursharedhomes.com

What to include:

Your full name, contact details, clear details about your request or complaint, and any relevant dates or reference numbers.

Step 2: Our response

We will:

- Verify your identity before processing your request
- Investigate thoroughly (for complaints) or process your request (for rights)
- Respond to you in writing within reasonable timeframes and as required by law
- Explain what actions we will take and keep you updated on progress
- Not charge you for making a request (except for reasonable access fees if applicable)
- Help you understand and exercise your rights

Step 3: If you're not satisfied (complaints only)

If you're not satisfied with our response to your complaint, you can:

- Ask for a review by our senior management, or
- Contact external bodies:
- Australian residents: Office of the Australian Information Commissioner (Phone: 1300 363 992, Website: www.oaic.gov.au)

This is the same process whether you want to access your information, correct mistakes, change marketing preferences, or make a complaint about our privacy practices.

Protecting your information

We use multiple layers of security to protect your information.

Technical safeguards

- Enterprise-grade encryption for data storage and transmission
- Regular security testing and monitoring
- Automated threat detection systems

Operational security

- Staff training on security and privacy

- Strict access controls based on job requirements
- Regular security audits and incident response procedures testing

Physical security

- Secure premises with controlled access
- Secure disposal of physical documents
- Equipment security protocols

User-generated content and public information

When you post content on our platform-including property listings, reviews, ratings, comments, photos or profile details-this information becomes accessible to other users and may be viewed by the public. Once you make information publicly available, we have no control over how others may access, use, copy or share that content. We are not liable for any use or misuse of publicly posted content by other users or third parties. Please exercise caution when deciding what information to share publicly on the platform.

How long we keep your information

We keep your personal information only as long as we need it for the purposes we collected it, or as required by law. When we no longer need it, we securely destroy or de-identify it.

Cookies and Analytics

What We Use

We use cookies, tracking pixels, and similar technologies on our website and in our emails to improve your experience and our services.

Cookies

- Small text files stored on your device
- Help remember your preferences
- Enable certain website functions
- Make your interactions with our website more efficient

Tracking Pixels

- Tiny, invisible images in web pages and emails
- Help us understand how you interact with our content
- Allow us to measure email engagement
- Enable more relevant content delivery

How we use these technologies

Essential Functions

- Remember your login status
- Maintain your session security
- Store your preferences
- Enable core website features

Analytics and Performance

- Understand how our website is used
- Measure page views and traffic
- Analyse user navigation patterns
- Identify areas for improvement

Personalisation

- Remember your preferences
- Tailor content to your interests
- Improve your browsing experience
- Provide relevant recommendations

Your control over cookies and tracking

You have several options to control cookies and tracking technologies:

- Adjust your browser settings to refuse or delete cookies
- Install browser extensions that block tracking technologies
- Configure your email client to block images by default (this prevents tracking pixels in emails from loading)
- Adjust your device privacy settings to limit tracking

Please note that if you block all cookies, including essential cookies, you may not be able to access certain features of our platform or your user experience may be significantly affected. Some functionality requires cookies to work properly.

Google Analytics

We use Google Analytics to understand how people use our website. This involves cookies that collect information about your browsing activity. You can opt out of Google's advertising features through your Google account settings, browser add-ons, or your device's privacy settings. Google provides various tools and options to control how your data is used for advertising purposes. You can learn more about how Google uses your data and your available options on Google's privacy pages.

Meta advertising tools

We use Meta's advertising tools (such as Meta Pixel) to understand how our ads perform and to show you more relevant advertisements on Meta platforms like Facebook and Instagram when you visit our website or app. You can manage whether we connect information from our website with your Meta account for advertising purposes by adjusting your settings within your Meta account preferences.

Artificial Intelligence (AI) Technologies

Overview

We use artificial intelligence and machine learning technologies in our business operations and services, including AI tools provided by third parties. We only use these technologies when legally permitted and necessary for our business.

How we use AI

We may use AI technologies to:

- Improve and optimise our services and operations
- Automate routine tasks and communications
- Personalise your experience with our services
- Support quality assurance processes
- Assist with customer support and queries

Data protection and security

When we work with third-party AI providers, we ensure they handle your personal information in accordance with privacy laws through contractual requirements and appropriate safeguards.

Your rights and our commitments

Any information generated or inferred about you by AI technologies is treated as personal information, and you maintain all the rights outlined in this privacy policy. When using AI with your personal information, we commit to:

Transparency and control

- We'll inform you when AI is used to make decisions that may significantly affect you
- We maintain human oversight and review of significant AI-generated decisions
- Our staff are trained to understand AI limitations and verify outputs before relying on them
- We implement processes to verify the accuracy of AI-generated outputs

Security

- We use appropriate technical and organisational measures to maintain the security and integrity of your personal information
- We regularly test and monitor AI outputs for accuracy and reliability

Risk mitigation

- We regularly assess and document risks associated with using AI to process personal information
- We implement appropriate measures to address these risks
- We continuously monitor AI performance and regularly review their impact

Use by minors

Our platform and services are designed for adults and require users to be at least 18 years of age. We do not intentionally collect personal information from minors. If you are under 18, you must have your parent's or guardian's permission before registering or sharing any information with us. If we discover that we have inadvertently collected information from a minor without proper parental consent, we will delete it promptly. We encourage parents and guardians to monitor their children's internet use.

Amendments

We may update this policy at any time by posting the revised version on our website. We recommend that you review our website regularly to stay current with any policy changes.

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