# **Privacy Policy**

#### Our commitment to privacy

Blackbird Property Management Pty Ltd ABN 61 633 355 245 is committed to managing personal information in accordance with the Australian Privacy Principles under the Privacy Act 1988 (Cth) (**Privacy Act**).

This document sets out our policies for managing your personal information and is referred to as our **Privacy Policy**.

In this Privacy Policy, "we" and "us" refers to Blackbird Property Management Pty Ltd and "you" refers to any individual about whom we collect personal information.

#### About us

We are an Australian owned property management business. We work with hosts all over Australia taking care of all of the details to ensure their clients enjoy the best stay.

#### What information do we collect about you?

We collect personal information about you when you visit our website, telephone us, email us and otherwise contact us. You may provide us with basic personal information such as your name, date of birth, phone number, address and email address when requesting our services or submitting an enquiry. We may also collect your credit card or bank account details (where you sign up for our host or guest services).

We may also collect additional personal information you provide to us, or authorise us to collect, as part of your interactions with us. This information may be sensitive in nature at times.

When you sign up as a guest, our guest screening service will collect information required to verify your identity including identity documents and photographs.

#### How do we collect your personal information?

*Direct interactions:* We collect information from you in a variety of ways, including when you interact with us electronically or in person, when you access our website, interact on our social media pages, use a contact form, telephone us or send us an email, and when we provide our products or services to you. We may also collect personal information about you from other sources, such as third parties.

Automated technologies or interactions: We use cookies on our website. A "cookie" is a small file stored on your computer's browser, which assists in managing customised settings of the website and tailored delivery of content. We collect certain information such as your device type, browser type, IP address, pages you have accessed on our websites and on third-party websites. You are not identifiable from such information.

This helps us to analyse data about web page traffic to:

- identify which pages are being used;
- monitor which pages you find useful and which you do not;
- provide you with a better user experience by tailoring the website to your needs, likes and dislikes;
  and
- gather and remember information about your preferences.

You can use the settings in your browser to control how your browser deals with cookies. However, in doing so, you may be unable to access certain pages or content on our website.

We also use Google Analytics to measure how many people visit our website, how they found our website, which pages they view on our website, and whether they download any content. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. By using our website, you consent to the processing of data about you by Google in the manner described in Google's Privacy Policy: https://policies.google.com/privacy.

Similar analytics are available via our social media pages. If you interact with us via a social media page, it is your responsibility to check their privacy practices and ensure you consent to them before providing any personal information.

Our website does not use encryption or other technologies to ensure the secure transmission of information via the internet. You are encouraged to exercise care in sending personal information via the internet as no internet based service can be completely secure and you use and transmit and exchange information at your own risk.

#### Why do we collect and use your personal information?

We collect personal information as we consider it to be reasonably necessary to carry out our business, which may include (but is not limited to);

- verifying your identity;
- determining your eligibility and suitability to use our services;
- delivery of our services including property management services, styling, event management, marketing and guest services;
- contacting and communicating with you including responding to queries, complaints and feedback from you or your guests;
- responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
- to ensure the proper functioning of our website, our business and operations;
- to provide you with an account via out website;
- to assist us with marketing, product and service development and research requirements;
- sending you information that we think will be of interest to you; and
- advertising and marketing our services.

#### Who do we disclose your personal information to?

The ways that we may use and disclose your personal information depend on the reason that you engaged us and the consents that you have given us. We may interact with guests, other businesses, advertising platforms and marketing services on your behalf in accordance with our engagement.

We may disclose information to third parties we engage in order to run our business, including our employees, officers, insurers, professional advisers, agents, suppliers, service providers and contractors.

We may from time to time need to disclose personal information where we believe it is necessary to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, in the course of a legal proceeding or in response to a law enforcement agency request.

If there is a change of control in our business (whether by merger, sale, transfer of assets or otherwise) customer information, which may include your personal information, could be disclosed to a potential purchaser under a confidentiality agreement.

We may use and disclose your personal information for other purposes explained at the time of collection, as would reasonably be expected or otherwise as set out in this Privacy Policy.

Third parties to whom we have disclosed your personal information may contact you directly to let you know they have collected your personal information and to give you information about their privacy policies.

## Do we use or disclose your personal information for direct marketing?

When you provide us with your contact details, you give your express and informed consent to us providing you with information and telling you about our products, services or events or any other direct marketing activity (including third party products, services, and events) which we consider may be of interest to you, whether by post, email, SMS, messaging applications and telephone (**Direct Marketing Communications**).

If at any time you do not wish to receive any further Direct Marketing Communications you may do this at any time by using the "unsubscribe" facility included in the Direct Marketing Communication or by contacting us at the details set out at the end of this document.

If you opt-out of receiving our Direct Marketing Communications, we may still contact you in relation to our ongoing relationship with you.

#### Do we disclose your personal information overseas?

Any personal information collected and held by us may be held at, a destination outside Australia, most commonly on Autohost, Guesty and Microsoft servers for their cloud based applications.

By submitting your personal information to us, you expressly consent to the disclosure, transfer, storing or processing of your personal information outside of Australia. In providing this consent, you understand and acknowledge that countries outside of Australia do not always have the same privacy protection obligations as Australia in relation to personal information.

We take such steps as are reasonable in the circumstances to ensure that any recipients of your personal information outside of Australia are bound by privacy principles equivalent to those contained within the Privacy Act or agree to meet the requirements of the Privacy Act.

If you do not agree to the transfer of your personal information outside of Australia, please either do not provide us with your personal information or contact us via the details set out at the end of this document.

## Can you deal with us anonymously?

Providing us with your personal information is optional and you may be able to remain anonymous or use a pseudonym when interacting with us. However, it may not always possible for this to occur especially if we are providing you with our services as we will need to verify property and account ownership. We will inform you if you are unable to remain anonymous or use a pseudonym when dealing with us.

## How do we hold your information?

We take all reasonable steps to maintain physical and electronic security to safeguard and secure your personal information from misuse, interference, loss and unauthorised access, modification and disclosure. Subject to the law, we take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for its purpose of collection. Our files are held for 7 years before they are securely destroyed unless otherwise agreed by us.

#### Third party websites

The website may contain links to third-party websites. We do not have any control over and are not responsible for the content or privacy practices of websites that are linked to our website. You access and use any linked website at your own risk. You should read the privacy policies on any linked website and only access and use the linked websites if you agree to the terms of those privacy policies.

If you elect to pay for our services using a third party platform such as Stripe, your payment will be processed externally by that third party. Our guest facing platforms including Guesty and Autohost also hold personal information. Their privacy policies can be accessed here:

Stripe: https://stripe.com/en-au/privacy

Autohost: https://www.autohost.ai/en/privacy

Guesty: https://privacy.guesty.com/privacy-policy

You should refer to their privacy policies to understand what information they collect and how they treat your personal information. You should not use a third party platform if you do not consent to your personal information being collected, used and stored as set out in their privacy policies.

Where we maintain social media pages, we are not responsible for the content or privacy practices of the hosts of those pages. Your personal information will be processed and hosted by those third parties. It is your responsibility to check their privacy practices to ensure you consent to them before providing us with any personal information.

### How can you access or seek correction of your personal information?

Please let us know if there are any errors in your personal information and keep us up-to-date with changes to your personal information (such as your name or address).

You are entitled to request access any personal information relating to you which we hold. You are also entitled to request that we correct such information if it is inaccurate, out of date, incomplete, irrelevant or misleading.

Please contact us via the details set out at the end of this document if you wish to access or correct any personal information we have about you. We will only decline your request where permitted or required under law including the Privacy Act.

#### What should you do if you have a complaint about the handling of your personal information?

You may contact us at any time if you have any questions or concerns about this Privacy Policy or about the way in which your personal information has been handled using the contact details at the end of this document.

If you are not satisfied with our response to your complaint, or you consider that we may have breached the Australian Privacy Principles or the Privacy Act, a complaint may be made to the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992 or by using the contact details on the website www.oaic.gov.au.

# How are changes made to this Privacy Policy?

We may amend this Privacy Policy from time to time, with or without notice to you.

We recommend that you visit our website regularly to keep up to date with any changes.

# How can you contact us?

Our contact details are:

**Privacy Officer** 

**Email**: hello@blackbirdpropertymanagement.com.au

**Phone**: 0424 160 005

This Privacy Policy was last updated on 16 February 2022.