

# Privacy Policy

## 1. Introduction

1.1 CheckVault Pty Ltd ABN 46 159 355 781 AFSL 429768 of Level 26, 1 Bligh Street, Sydney NSW 2000, Australia (CheckVault, we, our, us), and its related bodies corporate, recognises the importance of protecting the privacy of individuals accessing and using our website, [www.checktender.com.au](http://www.checktender.com.au), (Website). This document describes CheckVault's policy (Website Privacy Policy) regarding handling of personal information received by us through your access and use of the Website.

1.2 CheckVault respects your rights to privacy under the Privacy Act 1988 (Cth) (Act) and the National Privacy Principles and the Australian Privacy Principles in respect of the collection, use, disclosure and handling of personal information from individuals.

1.3 When used in this Website Privacy Policy, the term "personal information" has the meaning given to it in the Act. In general terms, it is information or an opinion, whether true or not, about an identified person or a person who is reasonably identifiable.

## 2. Collection and Use of Personal Information

2.1 CheckVault may collect your personal information in the following circumstances:

- (1) to process your online registration, including without limitation, any identity verification or security procedure to verify your identity and other information provided to us;
- (2) to provide you with further information and correspondence about our services;
- (3) in the course of providing our services through the Website, including without limitation, information regarding services requested by you, creating your profile for use of our services, for publication of our profile directory, and uploading any documents provided by you to provide our services;
- (4) to assist with the completion of transactions for you, including without limitation, providing your personal information to CheckVault's related bodies corporate, contractors or service providers to provide our services, including our escrow service;
- (5) to provide you with access to protected areas of our Website; and
- (6) to comply with any applicable law, rule, regulation, lawful and binding determination, decision or direction of a regulator, , including without limitation the Anti-Money Laundering and Counter-Terrorism Act 2006 (Cth) (AMLCT Act).

2.2 The information we may collect includes:

- (1) name;

- (2) mailing or street address;
- (3) e-mail address;
- (4) telephone contact number;
- (5) ARBN, ABN, ACN, business name, company name, trading name and any other entity name;
- (6) profession, occupation, title and/or position description;
- (7) insurance policies, WorkCover information, licence type and number and other information required by applicable laws and regulations;
- (8) type of request;
- (9) any additional information relating to you that you provide to us through use of the services offered on the Website;
- (10) information you provide to us through our service centre or customer surveys;
- (11) any additional information necessary to fulfil a particular request; and
- (12) transaction details, including credit card and bank account details in relation to any deposit or payment made using our escrow service. Payment details provided through our Website are processed through a secure web server with strong encryption.

2.3 If you do not provide us with information described above, we may not be able to provide the requested services to you.

2.4 CheckVault uses personal information collected through the Website for the following purposes:

- (1) to process your online registration and verify your identity and other information, including without limitation providing your personal information to CheckVault's related bodies corporate, contractors or service providers for the purpose of identity verification and fraud prevention services;
- (2) to provide products and services and send communications requested by you and other customers;
- (3) to facilitate and assist with the completion of the transaction, including without limitation, providing your personal information to CheckVault's related bodies corporate, contractors or service providers, providing the Buyer's personal information to the Seller and the Seller's personal information to the Buyer and providing other project related information to the parties to a particular transaction facilitated through the Website;
- (4) for the administrative, marketing, planning, product or service development and research purposes of CheckVault, its related bodies corporate, contractors or service providers;

(5) to answer enquiries, and provide information or advice about existing and new products or services;

(6) to conduct account management and payment processing including billing, external payment and accounting systems, including providing personal information to CheckVault's related bodies corporate, contractors or service providers;

(7) for any purpose made known to you at the time at the time of collection of your personal information;

(8) at CheckVault's sole discretion (not obligation), to facilitate any mediation, arbitration, tribunal hearing, court proceeding or other proceedings in relation to a dispute regarding a transaction facilitated by the Website; and

(9) to comply with any applicable law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority.

2.5 We may send you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications are sent in various forms, including mail, SMS and email, in accordance with applicable marketing laws, such as the Spam Act 2003 (Cth). If you indicate a preference in regards to a method of communication, we endeavour to use that method whenever practical to do so. In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see details below) or by using opt-out facilities provided in the marketing communications and we will ensure that your name is removed from our mailing list. We do not sell or rent personal information under any circumstances.

2.6 We use general, aggregated information to generate statistics and measure site activity to improve the usefulness of customer visits. Such information does not include personal information.

2.7 We may disclose your information:

(1) to our related bodies corporate, contractors or service providers for the purposes of operation of our Website or our business, fulfilling orders by you, and to otherwise provide products and services to you, including without limitation, relevant parties to a transaction facilitated by our Website, web hosting providers; IT systems administrators, mailing houses, couriers, escrow agents, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants, etc;

(2) to suppliers and other third parties with whom we have commercial relationships, for marketing and related purposes;

(3) to authorised persons named by you on your account;

(4) for any authorised purpose with your express consent;

(5) to the buyer or seller in a transaction (Buyer or Seller) (as the case may be) to assist with the completion of a transaction; and

(6) as required or authorised under any applicable law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or provided in co-operation with any governmental authority, including without limitation, under the AMLCT Act.

2.8 We will only disclose your personal information overseas if the disclosure is to you, or to one of your authorised representatives, or if it is with your express consent. We will not send your information outside of Australia in any other circumstances.

### 3. "Cookies" and "log files"

3.1 We may send a "cookie", a small summary file (containing a unique I.D. number) to your computer. This enables us to recognise your computer and greet you each time you visit our Website without bothering you with a request to register and also enables us to keep track of products you view so that, if you consent, we can send you news about these products. We also use cookies to measure traffic patterns, to determine which areas of our site have been visited and to measure transaction patterns in the aggregate. We use this to research our users' habits so that we can improve our online services. Our cookies do not collect personal information. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.

3.2 We may log IP addresses (i.e. the electronic addresses of computers connected to the Internet) to analyse trends, administer the site, track users movements, and gather broad demographic information.

3.3 Our website uses Google Analytics, a website service that enables the tracking of user analytics including but not limited to browser information, operating system information, pages viewed while browsing the website, website session times and referring website addresses, and enables us to help understand website traffic and usage. We also use the Google Ads service to enable remarketing services, and Google UserID, demographic and interest reports. Information about you regarding your web usage behaviour is held by Google and is subject to its Privacy Policy which can be viewed [here](#). Information from Google's UserID service may be connected to other data that we hold about you.

3.4 You can opt out of Google's use of cookies by visiting Google's [Ads Settings](#) and you can opt out of Google Analytics here <https://tools.google.com/dlpage/gaoptout/> Information about privacy issues relating to Google Analytics can be found here [https://support.google.com/analytics/topic/2919631?hl=en&ref\\_topic=1008008](https://support.google.com/analytics/topic/2919631?hl=en&ref_topic=1008008)

3.5 Third party vendors, including Google and Facebook, show our ads on sites across the Internet, and use cookies to serve ads to you based on your past visits to our website.

3.6 You can opt out of a third-party vendor's use of cookies, or the collection and use of information for ad targeting, by visiting the [Network Advertising Initiative opt out page](#) or [www.aboutads.info/choices](http://www.aboutads.info/choices).

#### **4. Security of your personal information**

4.1 We will take reasonable steps to protect any personal information we receive from you via our Website from misuse and loss and from unauthorised access, modification or disclosure. We may hold your information in either electronic or hard copy form. Personal information is destroyed or de-identified when no longer needed.

4.2 However as the Website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us and you do so at your own risk.

#### **5. Links to other Websites**

5.1 Our Website may contain links to websites operated by third parties (Third Party Websites). CheckVault is not responsible for the privacy practices or the content of Third Party Websites. Third Party Websites are responsible for informing you about their own privacy practices.

#### **6. Access and Correction**

6.1 You may request access to any personal information we hold about you at any time by contacting us (see details below). Where we hold information that you are entitled to access, we will endeavour to provide you with suitable means of accessing it (e.g. by emailing or mailing it to you).

6.2 If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request amendment of it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment then we will add a note to the personal information stating that you disagree with it.

#### **7. Contacting Us**

7.1 If you have any questions about our Website Privacy Policy, or any concerns or a complaint regarding the treatment of your privacy or breach of the Australian Privacy Principles by us, please use the Contact Us page on this Website to email us, or write to us at:

CheckVault Pty Ltd

GPO Box 52

Sydney NSW 2001

7.2 Your complaint will be treated as confidential. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns

and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in an appropriate manner with which you are satisfied.

7.3 More information about privacy law and privacy principles is available from the Privacy Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).

7.4 We may change this Website Privacy Policy from time to time. All changes to this Policy will be posted in an updated version of the Policy on this Website.