

Overview

As part of illion we recognise the importance of protecting Personal Information, this Policy outlines illion Tenancy's privacy and data protection practices.

By using our illion Tenancy Services you agree to your personal information (or the personal information you supply) being used in accordance with this Privacy Policy.

If your Personal Information was provided to us by another party, we will have sought their confirmation that you authorised them to provide us with your Personal Information in accordance with this Privacy Policy, and they informed you of your rights to access and request correction of your Personal Information, as set out below.

We may update our Privacy Policy from time to time to reflect changes to applicable law or changes to our business practices. The updated Privacy Policy will be published on this website and will apply to all Personal Information held from that time onwards.

Personal Information we collect

The Personal Information we collect from or about individuals, is the information that is reasonably necessary for our business purposes, being the provision of Tenancy review and assessment services. We may collect a significant amount of Personal Information from or about an individual including their:

- name:
- date of birth;
- identification details (such as Drivers Licence number)
- phone number/s:
- email address/es;
- residential / business / postal address;
- residence type;
- employment information;
- credit information; and
- publicly available information.



We do not have a need to collect sensitive information (such as race, religion, ethnicity, health information, criminal record, sexual orientation, trade union memberships etc.) so will not collect this information.

How we collect and hold Personal Information

As a provider of information services, the information we collect is predominantly held in a digital format. The collection of information may also include forming an opinion about an individual from the combined data elements we hold to allow us to present information in a more readily usable form.

We are serious about the security of the information we collect. To protect this information, we employ contractual and administrative steps to ensure that this information is protected against any unauthorised access, disclosure or misuse. In addition to this we also utilise significant technology solutions to protect against unauthorised access or disclosure.

All our employees undertake training in handling information, with particular emphasis on protecting the personal information of individuals. We limit physical and digital access to our premises and computer networks to those that require such access.

We collect information from our subscribers, from individuals, third party service/data providers, court records, publicly accessible databases, surveys or authorised parties.

We also may collect Personal Information about our subscribers, landlords, tenants, prospective tenants, employees and prospective employees, so that we can meet internal operational requirements, complete business transactions, conduct research, deliver products and services, administer accounts, provide subscriber support or meet regulatory requirements.



Purpose of collection, holding, using and disclosing Personal Information

We collect, hold, use and disclose Personal Information to operate our business, including providing services to our subscribers and individuals. Some of the most common purposes for this will be:

- assisting our subscribers in assessing applications for tenancy;
- assisting individuals in understanding their tenancy history;
- for identity verification purposes;
- managing our relationship with individuals and our subscribers;
- ensuring Personal Information is accurate and up to date;
- assisting our subscribers in risk management;
- for audit and record keeping purposes and to comply with our legal and regulatory obligations;
- processing and managing applications to work with us;
- for analytics, product development, research and benchmarking;
- sharing with our group companies to assist with the management of information.
- While this list is not exhaustive, any purposes outside of this list will be consistent with those permitted under privacy laws.

We also use aggregated, de-identified information (this information is not Personal Information as it does not identify any individual/s) for research, analysis and product development. This non-personal information may be incorporated into products and services provided to our subscribers for their business use.



Accessing and correcting Personal Information

Under privacy laws, an individual has the right to access and request correction of any Personal Information we hold about them. We also recognise the accuracy of the Personal Information we hold about an individual is critical to our business so encourage individuals to correct any errors where they exist.

To access Personal Information, we have established the Public Access Centre with the following contact points:

Telephone: 0800 836 268

E-mail: admin@illiontenancy.co.nz

While we take reasonable steps to ensure that the Personal Information held by us is accurate and up to date, we generally rely on our subscribers, data suppliers and individuals to inform us if the information we hold is inaccurate or incomplete.

Once Personal Information is provided it is important that any errors are corrected, these should be raised using the details above.

Making a complaint

While we aim to address matters quickly and efficiently, we understand there are times when things may go wrong and an individual may want to make a complaint.

To make a complaint it may be beneficial to complete the <u>Online Form</u> to ensure all relevant information is available, otherwise please speak with us on the contact number above. Alternatively, you may want to contact:

illion Tenancy

Attention to: Privacy Complaints Company: illion New Zealand



Postal Address: PO Box 9589 Newmarket, Auckland 1031 Email: complaints@illion.co.nz

As per the illion <u>Complaint Handling Policy</u>, we will address complaints as quickly and efficiently as possible, at a minimum we will acknowledge receipt of a complaint within one business day and commit to investigating the complaint and providing a response within 30 days, provided that we have access to all necessary information. In cases where further information, assessment or investigation is required, we will seek to agree on an acceptable alternative time frame.

If a privacy related complaint continues to be unresolved there may be the option to escalate the matter to the <u>Office of the Privacy Commissioner</u> (New Zealand).

Disclosure of information overseas

illion's businesses operate across Australia and New Zealand. Australia and New Zealand privacy laws are substantially similar. If we disclose information to our related companies as part of our internal operations, we will comply with Australian law in respect of Australian information and New Zealand law in respect of New Zealand information.

While our subscribers are generally local entities they may have operations overseas, this means we are unaware of what information our subscribers may disclose overseas. If information is supplied overseas we will take steps to ensure our subscribers continue to protect this information in line with Australian and/or New Zealand privacy laws. Unfortunately, it is not possible to identify those countries where our subscribers may allow their information to be disclosed to, or accessed from.

In supplying our services, we may utilise service providers, resources, and cloud-based processes located outside of Australia or New Zealand. We use reputable service providers and ensure they have appropriate controls and contractual obligations relating to security of data.

We have access to, and supply global businesses with information relating to local and global businesses, this may include limited Personal Information relating to the officers of the relevant businesses. It is not possible to list those countries in which this information may be accessible.



Use of Cookies (or technology identifiers)

We may use technology known as a "cookie" to collect statistical information about an individual when they visit the illion website or use any of our products or services. Cookies are small pieces of information captured in the browser when a device is used to access online content. This information is then used to record information about the visit, allowing it to remember the details of the visit and provide a more meaningful experience when the individual next visits our website.

The cookies we use do not identify the individual but may link to an email address if the visit to our website was from a link supplied in an email sent from us.

Cookies can be switched off by adjusting the settings on the web browser, or by choosing "do not accept cookies" when prompted. If cookies are disabled or removed then access to all of the content and facilities available on the website may not occur.

From time to time we may collect, use, store and disclose non-identifiable information relating to an individual's use of the illion website or any of our products or services. For example, we may record information such as the areas of the illion website visited along with the time, date and URL of the pages accessed, details of the device used to access the illion website, the IP address and/or the previous websites visited before linking to illion. We normally use this information in the aggregate to administer and improve our website and monitor website usage.

We may allow our service providers to also use cookies on our website to track performance and to advertise products and services elsewhere on the Internet.

Direct Marketing

illion Tenancy does not use or allow Personal Information relating to Tenants or Prospective Tenants to be used for Direct Marketing.

illion Tenancy may use the Personal Information of its subscribers to provide details of products or services that may be relevant to them.



Contact Us

If you have any questions relating to this Privacy Policy, please contact us at Privacy@illion.com.au.

A copy of this Policy, including updates, is available at any time via our website www.illiontenancy.co.nz under the Privacy link. If a printed copy is required this can be requested on 0800 836 268 or by email request to admin@illiontenancy.co.nz If required in a particular format, illion Tenancy will take reasonable steps to make this happen but may charge a fee depending on the format required.

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