

## Spree Privacy Policy

Effective as at 21 November 2018

### Introduction

Spree respects your privacy and it is important to us that you have an enjoyable experience buying and selling with us but also that you feel comfortable and safe in the process. We are committed to helping you understand the following:

- The personal information we collect and how we use that personal information;
- When we might disclose your personal information; and
- How we store and protect you personal information.

This Privacy Policy applies to the Spree mobile application (the **App**) the landing page [www.spreeau.com](http://www.spreeau.com) and any other services or tools (known as **Services**) where this Privacy Policy is referenced.

Spree is responsible for the collection, use, disclosure, retention and protection of your personal information under applicable national laws.

Please take time to read and understand the Privacy Policy. By providing personal information, registering for an account and/ or by using our Services, you agree and accept the terms of the Privacy Policy and Terms of Use. If you do not provide the information required, we may not be able to provide all of our Services to you.

### Collection of Personal Information

Personal information may include your name, email address, contact number, postal address, birthday, gender and photos. Personal information does not include anonymous or aggregated information that can no longer be used to identify you as a specific person.

We collect, process and retain personal information that you provide and any devices (including mobile devices) you use when you do the following:

1. Register for an account with us;
  - a. Information such as your name, username, email address, contact number, postal address, preferred method of communication and social media account details (if you choose to login and register via Facebook).
2. Features and functions available on our Services;
  - a. Including, but not limited to, when you post and ad, reply an ad, communicate with us or other users, information you provide for the Services that you use or during a transaction or other transaction- related information.
3. Provide information via the Services;
  - a. Including, but not limited to, providing your name, email address, contact numbers and social media profile information through the landing page;
  - b. Including, but not limited to, any such information you provide whilst participating in community discussions or chats; and
  - c. Any other information disclosed by you through the use of our Services.
4. Engage with your account;
  - a. Including updating or adding personal information to your account, adding items to your watchlist. By providing this information you may also give us your age, gender, interests and favourites.
5. Interact with us;

- a. Including, but not limited to, when you register for a survey, campaign, contest, competition and/or lucky draw with us;
  - b. When you interact with us offline or through an external third party.
6. Contact us
    - a. Including via the landing page, social media, customer support, dispute resolution or any other means for contacting Spree.

Spree may also collect and process information to authenticate you or your account or to verify information that you provided to us as permitted by applicable laws.

Spree may also collect the following from you:

- Information from the devices you use when interacting with us or our Services such as device ID or unique user ID, device type, ID for advertising and unique device token;
- Information about your location such as geo location, last known location and meet up location;
- 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.

You may allow or deny permission for access of the above, however, it may affect your use of our Services.

We collect information using cookies and related technologies including, but not limited to:

- Information about the pages you view, the date and time you view pages, the links you click and other actions you take on our Services, or within our advertising or email content.

Information we collect from other sources including:

1. Information we get from third parties;
  - a. which we may use to supplement your account information. For example, we may collect and use demographic information that is publically available, additional contact information, credit check information and information from credit bureaus, as permitted by applicable national laws.
2. Information from social media sites;
  - a. Including when you use social media to register, share information or connect to your account. Those sites may automatically give us access to some personal information they hold about you. If you give us access to any account with video content, we may share your video viewing with, or collect information about your video viewing from, third-party social media sites for a period necessary to fulfil the purposes outlined in this Privacy Policy or until you withdraw consent. You control the personal information we have access to through your privacy settings on the social media site and the permissions you give us when you grant us access. Examples of information we collect from your selected social media network include basic account information and any other additional information or activities that you permit the third party social network to share. When you grant us access to information held by social media sites you agree that we may collect, use and retain it in accordance with this Privacy Policy
3. Information you provide about another user; and
  - a. If you submit any personal information relating to other people to us or to our service providers in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.
4. Public databases, joint marketing partners and other third parties.

We encourage you to use common sense and exercise good judgement when sharing information with other users and third parties through our Services.

### **Use of Personal Information**

We may use the information collected and received from you for the following purposes:

- Provide and personalise our Services and content shown to you;
- Develop, operate, improve, deliver and maintain our Services
- Provide you with access to and use of our Services as well as access to your history, internal messages and other features we may provide;
- To verify your identity, update our records and generally maintain your Account with us;
- To process or resolve any dispute arising from or in connection with any transaction, in accordance with our Terms of Service;
- Offer you site content that includes items and services that you may like or be interested in;
- Provide other services requested by you as described when we collect the information;
- To provide you with location-based services (such as advertising, search results and other personalised content).
- To process or resolve any dispute arising from or in connection with any transactions, in accordance with our Terms of Service.
- Responding to your queries and resolving complaints.
- Carry out polls, surveys, analysis and research on how our Services are being used and how we can improve them.

We may use any ad you post on the Spree mobile app, including the uploaded photo or image of the product as well as other data associated with the ad, for our own advertising purposes, including social media, Facebook ads, newsletters and ads or promotions for any media.

We may use your information to update you on your listings and our Services and to send you marketing and/or promotional materials on the latest products and services of Spree. These updates will be sent by email and/or through push notifications and you can choose to unsubscribe from these updates at any time through the “Settings” page of your Account or unsubscribe option in the email you have received. We may use your information to send you service-related messages including, but not limited to, a welcome/confirmation email when you register your Account and to enforce our Terms of Service and other policies. These messages will be sent by email and/or through push notifications and you may not opt-out of receiving service-related messages from Spree, unless you deactivate your account.

We may use cookies to manage our user’s sessions and preferences and tracking information. We may use the information collected through cookies to promote, highlight, or otherwise feature certain items in connection with your use of the Services. We may use the responses to these promoted or featured items, or your search queries and results, to customise our Services to you. Declining the use of cookies may limit your access to certain features of the Website.

We may contact you via Spree chat, email, telephone call, SMS messages or postal mail from the information we collect of that you have provided:

- To give you customer support about your account such as to troubleshoot problems, to collect fees or monies owed to us, for dispute resolution purposes or to get your opinion through surveys;
- For other reasons such as to enforce our Terms of Use or policies and any other agreement we may have with you.

We use your personal information to customise our advertising and marketing, including to:

- Personalise, measure and improve our advertising;
- Contact you, either via email, telephone call, SMS text messages or postal mail to offer you discounts and special promotions and to let you know about our Services. Message and data rates may apply;
- Deliver targeted marketing, service updates and promotional offers.

We use your personal information for legal compliance reasons, including to:

- Prevent, detect, mitigate and investigate fraud, security breaches, potentially prohibited or illegal activities;
- Enforce our Privacy Policy, our Terms of Use or other policies; and
- Otherwise comply with applicable national laws.

### **Retention Period**

We will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law. We may also keep personal information from closed accounts to comply with applicable national laws, stop fraud, assist with any investigations, enforce our Terms of Use and take any other actions under applicable national laws. If we no longer require your personal information, we will securely dispose of it.

### **Communications**

Where permitted by applicable law, we may contact you and/or send to you commercial communications via electronic communications, such as email, to inform about our products, services, offers, or any commercial content related to Spree. If you don't want to receive marketing communications from us, you can unsubscribe via the link in the email you received from us.

Upon download of certain Services, you are provided the option to opt into receiving push notifications from Spree on your device and within the application. We send you push notifications from time-to-time to:

- (a) inform you of service related messages,
- (b) communicate messages from other users from Spree and
- (c) update you about any events or promotions that we may be running.

If you no longer wish to receive notifications from us, you can, where applicable, change your preferences by logging into your account or by disabling notifications in your device settings. To ensure you receive proper notifications, we will need to collect certain information about your device such as operating system and user identification information. Please note that even if you opt-out from receiving commercial communications, you may still receive administrative communications from Spree, including notifications about your account activities (e.g. account confirmations, password changes, etc.), and any other important announcements.

### **Public Information and Aggregate Personal Information**

Any information you post on the Services will become public and may be available to other users and the general public. We urge you to be very careful when deciding what information to disclose through the Services. Public information is any information, including personal information, you share with a public audience, including personal information you publish on the App. Public information is available to anyone on or off our Services and can be seen or accessed through online search engines, APIs, and offline media,

Please note that your user name and your public photo will be made available to the public when you participate in some of our Services, posting an ad, so you should exercise discretion when using our Services. Personal information posted by you or disclosed by you to other users may be collected by other users of such Services and may result in unsolicited messages. We are not responsible for protecting such information that you may choose to disclose to third parties through our Services.

In many cases, we will automatically collect certain non-personal information about your use of the Services. We collect this information to ensure that the Services function properly. We might collect, among other things, information about your browser or device, app usage data, information through cookies, pixel tags and other technologies, and aggregated information. This information may include:

- App usage data, such as the date and time the App on your device accesses our servers and what information and files have been downloaded to the App based on your device number. We may also, on some versions of the App, collect information about other applications that you may have on your device (but not about the contents of those applications). We may also collect information collected automatically through your browser or device, or through the App when you download and use it. We may collect Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, device manufacturer and model, language, Internet browser type and version and the name and version of the Services (such as the App) you are using;
- the operating system you are using, the domain name of your Internet service provider and your "click path" through the Services;
- IP address. We may also derive your approximate location from your IP address; and
- Non-personal information when you voluntarily provide it, such as your preferred method of communication.

We may aggregate personal information, which when aggregated does not personally identify you or any other user of the Services. We may use and disclose aggregated personal information for any purpose under applicable law.

### **Disclosure of your information**

We may disclose the personal information we collect from you to our affiliates for the following:

- provide content and services;
- help detect and stop possible fraud and illegal acts, violations of our Terms of Use, and data security breaches;
- offer you personalised advertising;
- guide decisions about their products, sites, applications, services, tools and marketing communications. Other group companies will not send you marketing communications unless you have consented to receiving their communications

We may disclose your information to third-parties:

- third party service providers who provide services such as website hosting, data analysis, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, auditing and other services; and to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock, assist us in providing customised advertising, help 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;
- Other third parties when you have given consent to share your information via Spree.
- Potential partners, investors and other parties with a view to a potential business partnership, collaboration, joint venture or otherwise in furtherance of our business.

We may disclose your information to law enforcement and other parties in connection with the law, including:

- law enforcement or governmental agencies, or authorised third-parties, in response to a verified request regarding a criminal investigation, alleged or suspected illegal activity, or any other activity that may expose us, you or any of our users to legal risk
- credit agencies or bureaus as authorised by applicable national laws;
- other third parties 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 if we otherwise believe in good faith that the disclosure is needed to prevent imminent physical harm, harm to property, financial loss or to report suspected illegal activity.

We may disclose the personal information we collect from you to provide you with our Services, to comply with the law, to enforce our policies, to protect our services, rights or property, to enable our marketing and advertising activities, or to prevent, detect, mitigate and investigate fraud or other illegal activities.

We may use or disclose the personal information we collect from you or you provide to us as we believe necessary or appropriate, including, but not limited to, using and disclosing personal information for the following purposes: to protect people or property, to protect our services, rights or property, to comply with legal requirements, to respond to legal process or law enforcement requests and to comply with requests from other public and government authorities.

We respect your privacy and we will not sell your personal information to any third party. We may disclose data and aggregate statistics about users of our Services and sales to prospective partners, advertisers, sponsors and other reputable third parties in order to describe our Services, deliver targeted advertisements or for other lawful purposes, but these data and statistics will not include information which can be used to identify you.

### **Access, Deletion and Modification of Information**

You can see, review and change your personal information through your account. Please update your personal information immediately if it changes or is inaccurate.

If you want to delete or deactivate your account on the App, a request can be made through the App and we will close your account and remove your personal information from view as soon as reasonably possible, based on your account activity and as required under applicable national laws.

We will honour your right to request access to, or modification or deletion of, your personal information. We may have the right to withhold that access or refuse to modify or erase your personal information under applicable national laws, but we will give you reasons if we do so.

It is important that you protect against unauthorised access of your Account and information by choosing your password carefully, and keeping your password and Account secure (e.g. by signing out after using our Services).

### **Security of Information**

We protect your information using organisational, technical and administrative security measures. No website or Internet transmission is, however, completely secure. Consequently, Spree cannot guarantee that unauthorised access, hacking, data loss, or other breaches will never occur. Your use of the Services is at your own risk. If you have reason to believe that your interaction with us is no longer secure please immediately notify us by contacting Spree customer support.

Spree urges you to take steps to ensure your personal information is safe. It is important that you protect against unauthorised access of your Account and information by choosing your password carefully, and keeping your password and Account secure (e.g. by signing out after using our Services).

### **Third Parties**

This Privacy Policy addresses only the use and disclosure of personal information we collect from you. If you choose to disclose your information to others, or if you are directed to a third party website, their privacy notices and practices will apply.

We can not guarantee the privacy or security of your information once you provide it to a third party. We have no control over, and are not responsible for, this third party's collection, use and disclosure of your Personal Information. We encourage you to check the privacy and security policies of third parties and trading partners before entering into a transaction and choosing to share your information, even when dealing with buyers or sellers on the App.

Spree does not provide you permission to add other users to your mailing list, call or send SMS text messages for commercial purposes, even if a user bought an item or service from you, unless the user has given their explicit consent. Sending unwanted, threatening or abusive emails or SMS text messages, or making unwanted, threatening or abusive calls breaches our Terms of Use and will not be tolerated as it is an abuse of our Services. If you are experiencing such contact or want to report such contact, please contact our customer service.

### **Change of Ownership**

If we were to merge with or be bought by another company, we may share information with them in accordance with our global privacy standards. The new combined entity would comply with this Privacy Policy. If your personal information is to be collected, used, disclosed or retained for any purposes not covered in this Privacy Policy, you will receive advance notice of any changes.

### **Use of Services by Minors**

The Services are not directed to individuals under the age of eighteen (18). As a condition of using our Services, you agree that you are at least 18 years of age. We do not knowingly collect personal information from individuals under eighteen (18) and we request that these individuals do not provide personal information through Our Services

### **Transfer of Personal information**

Spree, our affiliates and service providers may transfer, store and/or process your personal information outside of your country of residence. These countries may have data protection rules that are different from those in Australia. Employees in those countries may review and analyse your personal information in connection with the Services. By accepting this Privacy Policy, you agree to such transferring, storing and/or processing of personal information.

### **Notice of Changes to the Privacy Policy**

Spree reserves the right to modify this Privacy Policy at any time by posting the new Privacy Policy on the Services. All changes to the Policy will be effective when posted, and your continued use of any Spree Services after the posting of the new Privacy Policy will constitute your acceptance of, and agreement to be bound by, those changes. We may announce any changes to this Privacy Policy on our Services if we believe they are material.

### **Contacting Us**

If you have any questions, comments or complaints in relation to this Piracy Policy, please contact us by email to [support@spreeau.com](mailto:support@spreeau.com)