

RESIC Privacy Policy

RESIC Group Pty Ltd Privacy Policy

Last updated: 17 June 2024

RESIC Group Pty Ltd ACN 670 152 253 and our Related Bodies Corporate (as defined by the provisions of the *Corporations Act 2001* (Cth)), namely:

- Holo Home Loans Pty Ltd T/A HoLo ACN 604 562 781 ([HoLo](#));
- OHPG Pty Ltd T/A Happy Buyers Club ACN 667 510 330 ([Happy Buyers Club](#));
- Develo Pty Ltd T/A Develo ACN 620 074 311 ([Develo](#)),

(together, **RESIC, we, us** and **our**) respect your privacy and are committed to protecting it. We comply with the Australian Privacy Principles and the *Privacy Act 1988* (Cth) (**Privacy Act**), which govern the way private sector organisations collect, use, keep secure and disclose Personal Information or Personal Data. The Privacy Act defines “Personal Information” to mean any information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent or can be reasonably ascertained, from the information or an opinion.

If you are a resident of the European Union or the United Kingdom, we are required to comply with the GDPR (as defined in clause 12) in relation to your Personal Data (as defined in clause 12).

If you have any concerns or complaints about the manner in which your Personal Information and Personal Data has been collected, used or disclosed by us, please contact us via the information set out in clause 11 and we will resolve your concern or answer your question.

We recommend that you keep this information for future reference.

1. The kinds of Personal Information and Personal Data collected, used and disclosed by RESIC

We will only use or disclose your Personal Information and Personal Data for the primary purposes for which it was collected or as consented to by you. At or around the time we collect Personal Information and Personal Data from you, we will endeavour to provide you with a notice which details how we will use and disclose that specific information. We set out some common collection, use and disclosure instances in the table below.

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Purpose	Type of Information	Uses	Disclosures
Website enquiries	<ul style="list-style-type: none"> ● Contact information: Such as your name, address, email address, phone numbers. ● Website enquiries: Such as your name, email address, phone number and any information you provide to us as part of your enquiry. ● User information: Such as your username and password where you use our services requiring this information. ● Transaction sales: Such as billing and account details, and payment card details. ● Customer Service: Information collected in connection with our customer services department. 	<p>The types of uses we will make of Personal Information and Personal Data collected for this type of purpose include:</p> <ul style="list-style-type: none"> ● Identity verification: (If required) verifying your identity. ● Referral: (In respect of your contact information only) offering you other RESIC services and developing client relationships. ● Services: Providing our services to you including: <ul style="list-style-type: none"> – enabling you to use our services; – conducting checks for financial standing and credit-worthiness (as detailed in our Credit Guide and outlined further in the “<i>Home loan application</i>” section below); – providing customer service functions, including handling customer enquiries and complaints. ● Marketing: (In respect of your contact information only) for the purposes set out in the “<i>Marketing services</i>” section below. ● General administrative and security use <ul style="list-style-type: none"> – Protecting RESIC’s websites from security threats, fraud or other criminal activities. – Administration and management functions of RESIC. – Maintaining and developing our services, business systems and infrastructure. – In connection with the sale of any part of RESIC’s business or a company owned by a RESIC entity. – Providing customer services to clients and for quality assurance purposes. 	<p>The types of disclosures we will make of Personal Information and Personal Data collected for the type of purposes listed include, without limitation, to:</p> <ul style="list-style-type: none"> ● third parties connected with the sales process including ecommerce, payment gateway providers and financial institutions; ● service providers (including IT service providers and consultants) who assist RESIC in providing our services; ● related bodies corporate of RESIC (including related entities); ● third parties in connection with the sale of any part of RESIC’s business or a company owned by a RESIC’s entity; and ● as required or authorised by law.
Marketing services	<ul style="list-style-type: none"> ● Contact information: Such as your name, email address, current postal and residential addresses, phone numbers, country of residence (and, if applicable, age). ● Online blogs/Forums: Information such as: <ul style="list-style-type: none"> – user account information (ie username and password and other contact information); and – any other information provided to RESIC or posted on our forums. 	<ul style="list-style-type: none"> ● General marketing and consumer analytics, including <ul style="list-style-type: none"> – aggregating with other information for marketing and consumer analytics purposes; – offering you updates on services, events or information that may be of interest to you; – marketing and promotional activities by us (including by email and text message) such as our email alerts, product awareness information and newsletters; and – for the Uses detailed above in “<i>Website enquiries</i>”. 	<p>We may disclose your Personal Information and Personal Data to:</p> <ul style="list-style-type: none"> ● third parties connected with the marketing process who assist us in providing our services to you; ● the parties listed in the Disclosure column for “<i>Website enquiries</i>”; and ● our internal companies to assist us in retargeting and cross referral opportunities.

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Purpose	Type of Information	Uses	Disclosures
		<ul style="list-style-type: none"> ● Online accounts: If you create an account with RESIC and you provide us your Personal Information and Personal Data, we will use it for customer service related contact. 	
Referral services (Real Estate Library users only)	<ul style="list-style-type: none"> ● Contact information: Such as your name, email address, current postal and residential addresses, phone numbers, country of residence (and, if applicable, age). ● Bank account information: Bank account (including bank statements), credit or debit card details, BSB and account numbers. 	<ul style="list-style-type: none"> ● General marketing and referrals: Offering you updates on services, events or information that may be of interest to you. ● Referral: (In respect of your contact information only) offering you other RESIC services and developing client relationships. ● User payments: Facilitating payment for successful HoLo referral fees. 	<p>We may disclose your Personal Information and Personal Data to:</p> <ul style="list-style-type: none"> ● our contractors, agents and third party providers who undertake billing and credit services on our behalf; ● third parties connected with the marketing process who assist us in providing our services to you; ● the parties listed in the Disclosure column for “<i>Website enquiries</i>”; and ● our internal companies to assist us in retargeting and cross referral opportunities.
HoLo Platform use and Home loan applications (HoLo users only)	<ul style="list-style-type: none"> ● Contact and personal information: Such as your full name, date of birth, gender, current address and relevant previous addresses, driver’s licence number, and current and any previous relevant employers. ● Government identifiers: Primary identification information (such as a current drivers licence, passport, Medicare card, and birth certificate). ● Financial, credit and consumer credit history information, including: <ul style="list-style-type: none"> – earnings, spendings, liabilities and assets – past credit providers and the type of credit provided to you; – details and terms of your previous credit, including repayment and interest obligations, and repayment history; – financial hardship information; – information request (or credit enquiry); – information regarding any defaults on a consumer credit payment of \$150.00 or more which are at least 60 days overdue; and – a statement that you have since paid an amount that was recorded as default in your consumer credit report. ● Other information relevant to assessing your home loan application, including: 	<p>For full details relating to uses of Personal Information and Personal Data in relation to the use of credit information, please refer to our Credit Guide. Some of the uses include:</p> <ul style="list-style-type: none"> ● Purchases of RESIC’s services: Assisting you to make decisions relating to your finances and property purchase; assessing your credit history and financial situation; processing of your home loan application. ● Online accounts: If you create an account with RESIC and you provide us your Personal Information and Personal Data, we will use it for processing of account transactions and other customer service related contact. ● General administrative and security use: In connection with your home loan application. ● General financial analytics: Analysing financial circumstances and broker appropriate home loan products. ● User payments: Facilitating payment of successful HoLo referral fees. ● Compliance with legal and regulatory obligations, including provision of information to government assessment agencies as required by legislation. 	<p>For full details relating to disclosures of Personal Information and Personal Data in relation to any credit information, please refer to our Credit Guide.</p> <p>In summary, we may disclose this type of Personal Information and Personal Data to:</p> <ul style="list-style-type: none"> ● third party providers who assist us in providing our services to you, including home loan aggregators, lenders, banks and other parties who assist in assessing your credit and financial history, or providing you with a loan; ● relevant government entities; ● (if applicable) any borrowing partners or guarantors listed in your home loan application; ● third parties, such as external debt recovery agents, courts or other entities to which we are required by law to disclose Personal Information and Personal Data; and ● the parties listed in the Disclosure column for “<i>Website enquiries</i>”.

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Purpose	Type of Information	Uses	Disclosures
	<ul style="list-style-type: none"> - property data regarding current loan details, interest rates, repayments and available equity (if any) - court proceedings regarding your credit situation; - information about you recorded on the National Personal Insolvency Index, regarding bankruptcy and debt agreements; - publicly available information affecting your creditworthiness; and - opinions of credit providers relevant to your loan application. 		
Employees and contractors	<ul style="list-style-type: none"> ● Contact information: Such as your name, e-mail address, current postal and residential address, phone numbers, country of residence, next of kin contact details. ● Employee record information. ● Identifying information: Such as your photo, passport and residency details, date of birth. ● CV, resume or application related information: Such as the details provided in your resume or CV, your eligibility to work in Australia, your education, previous employment details, professional memberships or trade qualifications. ● Tax, superannuation and payroll information: Such as your Tax File Number and ATO Declaration, superannuation details and financial institution details. ● Background check information: Information obtained from you or third parties to perform background checks. ● Medical or health information which you voluntarily provide to us as part of pre-employment medicals, random drug and alcohol testing or such other information which may be related to an incident which has occurred during the course of your employment or engagement with RESIC. ● Performance related information: Pre-employment testing and other information collected by RESIC's systems in the course of your employment or engagement with RESIC. ● Information collected from referees. ● Security information: Such as CCTV footage and photographs taken on our premises. 	<ul style="list-style-type: none"> ● Background checks: Assessing candidate suitability for role or engagement, including by obtaining: <ul style="list-style-type: none"> - verification of your identity and age; - criminal history background checks and social media checks (including publicly available information including Facebook, X, Instagram, YouTube); - confirmation of eligibility to work in Australia; - confirmation of education and qualifications; - confirmation of previous employment; - medical history and general fitness assessment to ensure you are able to perform your job safely and effectively; and - consideration regarding medical leave. ● Administration and performance monitoring use: Including for the purpose of: <ul style="list-style-type: none"> - dealings related to the employer/employee relationship or the contractor/principal relationship (as the case may be); - use of such information whether or not the employment or contractor relationship is prospective, current or past; - use of such information to monitor systems, performance and time usage and internet usage; and - administration and management of RESIC. 	<p>We may disclose your Personal Information and Personal Data to:</p> <ul style="list-style-type: none"> ● relevant superannuation companies; ● government agencies, including but not limited to the Australian Taxation Office, Centrelink and Department of Human Services; ● relevant Worker's Compensation organisation (eg WorkCover Queensland etc); ● recruitment agents used in connection with your application with us; ● third party referees nominated by you in connection with an application made to RESIC; ● third party parties in connection with obtaining any background checks, pre-employment screening; ● service providers (including IT service providers and payroll providers), if any; ● third parties in connection with the sale of any part of RESIC's business or a company owned by RESIC; ● financial institutions for payroll purposes; and ● as required or authorised by law.

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2. How RESIC collects and holds Personal Information and Personal Data

2.1 Collection generally

As much as possible or unless provided otherwise in this Privacy Policy or a notification, we will collect your Personal Information and Personal Data directly from you. When you engage in certain activities, such as filling out a survey or sending us feedback, we may ask you to provide certain information. It is completely optional for you to engage in these activities.

Depending upon the reason for requiring the information, some of the information we ask you to provide may be identified as mandatory or voluntary. If you do not provide the mandatory information or any other information we require in order for us to provide our services to you, we may be unable to provide our services to you in an effective manner, or at all.

2.2 Other collection types

We may also collect Personal Information and Personal Data about you from other sources and third parties. Some examples of these alternative collection events are:

- (a) when we collect Personal Information and Personal Data about you from third parties; or
- (b) when we collect Personal Information and Personal Data about you from publicly available sources including but not limited to, court judgments, directorship and bankruptcy searches, Australia Post, White Pages directory, and social media platforms (such as Facebook, Twitter, Google, Instagram etc).

2.3 Notification of collection

If we collect details about you from someone else, we will, whenever reasonably possible, make you aware that we have done this and why, unless special circumstances apply, including as described in this clause 2.3(a) to clause 2.3(c) below. Generally speaking, we will not tell you when we collect Personal Information and Personal Data about you in the following circumstances:

- (a) where information is collected from any personal referee you have listed on any application form (including any employment application) with RESIC;
- (b) where information is collected from publicly available sources including but not limited to court judgments, directorship and bankruptcy searches, social media platforms (such as Facebook, Twitter, Google, Instagram etc); or
- (c) as otherwise required or authorised by law.

2.4 Unsolicited Personal Information and Personal Data

In the event we collect Personal Information and Personal Data from you, or a third party, in circumstances where we have not requested or solicited that information (known as unsolicited information), and it is determined by RESIC (in its absolute discretion) that the Personal Information and Personal Data is not required, we will destroy the information or ensure that the information is de-identified.

In the event that the unsolicited personal information collected is in relation to potential future employment with RESIC, such as your CV, resume or candidacy related information, and we determine we may consider you for potential future employment, we may keep that information in our human resource records.

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2.5 How we hold your Personal Information and Personal Data

Once we collect your Personal Information and Personal Data, we will either hold it securely and store it on infrastructure owned or controlled by us or with a third party service provider who have taken reasonable steps to ensure they comply with the Privacy Act. We provide some more general information on our security measures in clause 9 (**Data security and quality**).

2.6 Cookies and IP addresses

If you use our website, we may utilise “cookies” which enable us to monitor traffic patterns, trends and to serve you more efficiently if you revisit our website. In most cases, a cookie does not identify you personally but may identify your internet service provider or computer.

We may gather your IP address as part of our business activities and to assist with any operational difficulties or support issues with our services. This information does not identify you personally.

However, in some cases, cookies may enable us to aggregate certain information with other Personal Information and Personal Data we collect and hold about you. RESIC extends the same privacy protection to your Personal Information and Personal Data, whether gathered via cookies or from other sources, as detailed in this Privacy Policy.

You can set your browser to notify you when you receive a cookie and this will provide you with an opportunity to either accept or reject it in each instance. However, if you disable cookies, you may not be able to access certain areas of our websites or take advantage of the improved web site experience that cookies offer.

3. Uses and discloses of Personal Information and Personal Data

3.1 Use and disclose details

We provide a detailed list at clause 2 of some common uses and disclosures we make regarding the Personal Information and Personal Data we collect.

3.2 Other uses and disclosures

We may also use or disclose your Personal Information and Personal Data and in doing so we are not required to seek your additional consent:

- (a) when it is disclosed or used for a purpose related to the primary purposes of collection detailed above and you would reasonably expect your Personal Information and Personal Data to be used or disclosed for such a purpose;
- (b) if we reasonably believe that the use or disclosure is necessary to lessen or prevent a serious or imminent threat to an individual's life, health or safety or to lessen or prevent a threat to public health or safety;
- (c) if we have reason to suspect that unlawful activity has been, or is being, engaged in;
or
- (d) if it is required or authorised by law.

3.3 Use and disclosure procedures

In the event we propose to use or disclose such Personal Information and Personal Data other than for reasons set out in the above table at clause 2 or as otherwise outlined in this Privacy Policy, we will first notify you or seek your consent prior to such disclosure or use.

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Your Personal Information and Personal Data is disclosed to these organisations or parties only in relation to the services we provide to you or for a purpose permitted by this Privacy Policy.

We take such steps as are reasonable to ensure that these organisations or parties are aware of the provisions of this Privacy Policy in relation to your Personal Information and Personal Data.

3.4 Communications opt-out

If you have received communications from us and you no longer wish to receive those sorts of communications, you should contact us via the details set out in clause 11 and we will ensure the relevant communication ceases. Any other use or disclosure we make of your Personal Information and Personal Data will only be as required or authorised by law or as permitted by this Privacy Policy or otherwise with your consent.

4. Sensitive information

4.1 Sensitive information generally

Sensitive information is a subset of Personal Information and Personal Data. It means information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political organisation, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information about an individual, genetic information, biometric information that is to be used for the purpose of automated biometric verification or biometric identification or biometric templates.

4.2 Collection and use of sensitive information

In general, we attempt to limit the collection of sensitive information we may collect from you, but depending on the uses you make of our services this may not always be possible and we may collect sensitive information from you in order to carry out the services provided to you. However, we do not collect sensitive information from you without your consent.

The type of sensitive information we may collect about you is dependent on the services provided to you by RESIC and will be limited to the purpose(s) for which it is collected. We set out some types of sensitive information we may collect about you in the "*Employees and contractors*" section of the table at clause 2 above.

We do not use sensitive information to send you Direct Marketing Communications (as set out in clause 5 below) without your express consent.

4.3 Consent

We may collect other types of sensitive information where you have consented and agree to the collection of such information. Generally speaking, we will obtain this type of consent from you at (or around) the point in time in which we collect the information.

5. Direct Marketing

5.1 Express informed consent

You give your express and informed consent to us using your Personal Information and Personal Data set out in:

- (a) the "*Website enquiries*" section of the table at clause 2 of this document above; and
 - (b) the "*Marketing services*" section of the table at clause 2 of this document above,
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to provide you with information and to tell you about our 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**).

5.2 Inferred consent and reasonable expectations of direct marketing

Without limiting clause 5.1, if you have provided inferred or implied consent (eg not opting out where an opt-out opportunity has been provided to you) or if it is within your reasonable expectation that we send you Direct Marketing Communications given the transaction or communication you have had with us, then we may also use your Personal Information and Personal Data the purpose of sending you Direct Marketing Communications which we consider may be of interest to you.

5.3 Opt-out

If at any time you do not wish to receive any further Direct Marketing Communications from us or others under this clause 5, you may ask us not to send you any further information about services and not to disclose your information to other organisations for that purpose. You may do this at any time by using the “unsubscribe” facility included in the Direct Marketing Communication or by contacting us via the details set out in clause 11.

6. Credit Information and our Credit Guide

6.1 Credit information generally

The *Privacy Act 1988* (Cth) contains provisions regarding the use and disclosure of credit information, which applies in relation to the provision of both consumer credit and commercial credit.

6.2 Credit information and RESIC

We use credit related information for the purposes set out in the “*Home loan applications*” section of the table at clause 2 above and our **Credit Guide**.

6.3 Storage and access

We will store any credit information you provide us, or which we obtain about you, with any other Personal Information and Personal Data we may hold about you. We do not store credit information you provide to us with any overseas providers. See clause 8.1 for more information regarding the storage of your information.

You may request to access or correct your credit information in accordance with the provisions of clause 10 and the provisions of our **Credit Guide**.

6.4 Complaints

Please see clause 11 and the provisions of our **Credit Guide** if you wish to make a complaint in relation to our handling of your credit information.

6.5 Our Credit Guide

Please see our **Credit Guide** for further information as to the manner in which we collect, use, store and disclose credit information.

7. Anonymity and pseudo-anonymity

Due to the nature of the services RESIC provides to you, it is impractical (and, in some cases, impossible) for us to deal with you on an anonymous basis or through use of a pseudonym.

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8. Cross Border Disclosure

8.1 Cross border disclosures

Some Personal Information and Personal Data collected and held by RESIC, such as your user name and email address, may be disclosed to, and held at, a destination outside Australia, including but not limited to **the United States of America**, where we utilise third party service providers to assist RESIC with providing our services to you. Personal Information and Personal Data may also be processed by staff or by other third parties operating outside Australia who work for us or for one of our suppliers, agents, partners or related companies. RESIC does not disclose your user identification, financial information or relevant uploads for storage in countries other than Australia.

As we use service providers and platforms which can be accessed from various countries via an Internet connection, it is not always practicable to know where your information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed above.

In addition we may utilise overseas IT services (including software, platforms and infrastructure), such as data storage facilities or other IT infrastructure. In such cases, we may own or control such overseas infrastructure or we may have entered into contractual arrangements with third party service providers to assist RESIC with providing our services to you.

8.2 Provision of informed consent

By submitting your Personal Information and Personal Data to RESIC, you expressly agree and consent to the disclosure, transfer, storage or processing of your Personal Information and Personal Data outside of Australia. In providing this consent, you understand and acknowledge that countries outside Australia do not always have the same privacy protection obligations as Australia in relation to Personal Information and Personal Data. However, we will take steps to ensure that your information is used by third parties securely and in accordance with the terms of this Privacy Policy.

The Privacy Act requires us to take such steps as are reasonable in the circumstances to ensure that any recipients of your Personal Information and Personal Data outside of Australia do not breach the privacy principles contained within the Privacy Act. By providing your consent, under the Privacy Act, we are not required to take such steps as may be reasonable in the circumstances. However, despite this, we acknowledge the importance of protecting Personal Information and Personal Data and have taken reasonable steps to ensure that your information is used by third parties securely and in accordance with the terms of this Privacy Policy.

8.3 If you do not consent

If you do not agree to the disclosure of your Personal Information and Personal Data outside Australia by RESIC, you should (after being informed of the cross border disclosure) tell RESIC that you do not consent. To do this, either elect not to submit the Personal Information and Personal Data to RESIC after being reasonably informed in a collection notification, or please contact us via the details set out in clause 11.

9. Data security and quality

9.1 RESIC's security generally

We have taken steps to help secure and protect your Personal Information **and Personal Data** from unauthorised access, use, disclosure, alteration, or destruction. You will appreciate, however, that we cannot guarantee the security of all transmissions or Personal Information, especially where human error is involved or malicious activity by a third party.

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Notwithstanding the above, we will take reasonable steps to:

- (a) make sure that the Personal Information and Personal Data we collect, use or disclose is accurate, complete and up to date;
- (b) protect your Personal Information and Personal Data from misuse, loss, unauthorised access, modification or disclosure both physically and through computer security methods; and
- (c) destroy or permanently de-identify Personal Information and Personal Data if it is no longer needed for its purpose of collection.

9.2 Accuracy

The accuracy of Personal Information and Personal Data depends largely on the information you provide to us, so we recommend that you:

- (a) let us know if there are any errors in your Personal Information and Personal Data; and
- (b) keep us up-to-date with changes to your Personal Information and Personal Data (such as your name or address).

We provide information about how you can access and correct your information in clause 10.

10. Access to and correction of your Personal Information and Personal Data

You are entitled to have access to any Personal Information and Personal Data relating to you which we hold, except in some exceptional circumstances provided by law (including the Privacy Act). You are also entitled to edit and correct such information if the information is inaccurate, out of date, incomplete, irrelevant or misleading.

If you would like access to or correct any records of Personal Information and Personal Data we have about you, you are able to access and update that information (subject to the above) by contacting us via the details set out in clause 11.

11. Resolving Privacy Complaints

11.1 Complaints generally

We have put in place an effective mechanism and procedure to resolve privacy complaints. We will ensure that all complaints are dealt with in a reasonably appropriate timeframe so that any decision (if any decision is required to be made) is made expeditiously and in a manner that does not compromise the integrity or quality of any such decision.

11.2 Contacting RESIC regarding complaints

If you have any concerns or complaints about the manner in which we have collected, used or disclosed and stored your Personal Information and Personal Data, please contact us by email at complaints@resicgroup.com.au.

11.3 Steps we take to resolve a complaint

In order to resolve a complaint, we:

- (a) will liaise with you to identify and define the nature and cause of the complaint;
 - (b) may request that you provide the details of the complaint in writing;
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- (c) will keep you informed of the likely time within which we will respond to your complaint; and
- (d) will inform you of the legislative basis (if any) of our decision in resolving such complaint.

11.4 Register of complaints

We will keep a record of the complaint and any action taken in a Register of Complaints.

12. GDPR

12.1 Definitions

In providing our services, or collecting and using your Personal Data, we are required to comply with the GDPR where you are a European Union resident or a United Kingdom resident.

The following defined terms have the associated meanings:

- (a) “**Data Subject**” has the meaning attributed to that term in the GDPR.
- (b) “**GDPR**”, when used in the context of European Union residents, means Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC and when used in the context of United Kingdom residents, means the UK General Data Protection Regulation as implemented by the *Data Protection Act 2018*; and
- (c) “**Personal Data**” means the Personal Data (having the meaning attributed to that term in the GDPR) of the Data Subjects whose data is processed for the purposes of the provision of our retail services.

12.2 GDPR Obligations

If you are a resident of the European Union or the United Kingdom for the purposes of the GDPR, then in addition to what is set out in clauses 1 to 11 above, the following applies to you.

Under the GDPR, RESIC is considered a “data controller” in the provision of its services to you, and as such determines the purposes and means for processing of personal data.

In addition to your rights of access and correction set out above, as a Data Subject you may:

- (a) (**access**) request access to your Personal Data held by RESIC;
 - (b) (**rectification**) request to update or rectify any of the Personal Data that we hold about you by contacting us at the details specified above and request Personal Data updates;
 - (c) (**erasure**) withdraw your consent to RESIC’s use of your Personal Data as described in this policy by deletion or erasure of your Personal Data that we hold where that data is no longer required for the purpose for which it was collected;
 - (d) (**restriction on processing**) obtain from RESIC a restriction on processing of your Personal Data where:
 - (1) accuracy of the Personal Data is contested;
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- (2) the processing by the processor is unlawful (and you oppose erasure but request restriction of use);
 - (3) RESIC no longer needs your Personal Data; or
 - (4) you have objected to processing pursuant to your right to object under Article 21(1) of the GDPR; and
- (e) **(data portability)** request that RESIC:
- (1) provides you with a copy of the Personal Data that RESIC holds about you in a portable and machine readable form; or
 - (2) share your Personal Data with a nominated third party.

12.3 Exercising Data Subject rights

If you wish to exercise any of your Data Subject rights, then please send your request in writing to the details above in clause 12.2. We will process your request promptly and in any event, within one month of receipt of receiving it.

12.4 Complaints

If you have any concerns in relation to RESIC collection or processing of your Personal Data, then you also have a right to complain to a supervisory authority (within the meaning of the GDPR).

13. Consent, modifications and updates

13.1 Interaction of this Policy with contracts

This Privacy Policy is a compliance document prescribed by law rather than a legal contract between two or more persons. However, certain contracts may incorporate all, or part, of this Privacy Policy into the terms of that contract. In such instances, RESIC may incorporate the terms of this policy such that:

- (a) certain sections or paragraphs in this policy are incorporated into that contract, but in such a way that they do not give rise to contractual obligations onto RESIC, but do create contractual obligations on the other party to the contract; and
- (b) the consents provided in this policy become contractual terms provided by the other party to the contract.

13.2 Acknowledgement

By using our website, purchasing a service from RESIC, where you have been provided with a copy of our Privacy Policy or had a copy of our Privacy Policy reasonably available to you, you are acknowledging and agreeing:

- (a) to provide the consents given by you in this Privacy Policy; and
- (b) that you have been informed of all of the matters in this Privacy Policy.

13.3 Modifications and updates

We reserve the right to modify our Privacy Policy as our business needs require. We will take reasonable steps to notify you of such changes (whether by direct communication or by posting a notice on our website). If you do not agree to our continued use of your personal

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information due to the changes in our Privacy Policy, please cease providing us with your Personal Information and contact us via the details set out in clause 11.

