
1. Who we are and respect for your privacy

- 1.1 Colomba Property Pty Ltd ("Colomba", or "we") provides decluttering, downsizing, moving support, sale/disposal coordination, cleaning, gardening and related transition services
- 1.2 Due to the nature of the services, from time to time we assist elderly or vulnerable individuals to provide these transition services, accordingly we may receive or become aware of Sensitive Information.
- 1.3 Colomba Property Pty Ltd respects your right to privacy and is committed to safeguarding the privacy of our clients, customers, and website visitors. We adhere to the APPs contained in the Privacy Act 1988 (Cth) ("the Act"). This policy sets out how we collect and treat your Personal Information.
- 1.4 "APP" means an Australian Privacy Principle, and "APPs" means the Australian Privacy Principles.
- 1.5 "Personal Information" is information we hold which is identifiable as being about you.
- 1.6 "Sensitive Information" is Personal Information that attracts a higher level of privacy protection under the Act, and includes health information.
- 1.7 "You" means the client receiving the services.

2. The Kind of Personal Information Collected and Held

- 2.1 Colomba will, from time to time, receive and store Personal Information you enter onto our website, provided to us directly or given to us in other forms.
- 2.2 You may provide basic information such as your name, phone number, address, and email address to enable us to send information, provide updates and process your product or service order. We may collect additional information at other times, including but not limited to, when you provide feedback, when you provide information about your personal or business affairs, change your content or email preference, respond to surveys and/or promotions, provide financial or credit card information, or communicate with your customer support.
- 2.3 Additionally, we may also collect other information you provide while interacting with us in order to provide the services, which may include property details, representative details, service instructions, photographs/inventories of possessions, payment information, and potentially health or information related to any vulnerabilities you may have. Health information is considered Sensitive Information under the Act.
- 2.4 In providing our services, we may collect or become aware of Sensitive Information about you where it is reasonably necessary for our functions or activities and:
 - (a) you have consented to the collection; or
 - (b) we are otherwise permitted or required by law to collect the information.
- 2.5 The Sensitive Information we may collect or become aware of may include information about your health, mobility, accessibility needs, disability, support needs, vulnerability, safety risks, family or representative arrangements, or other matters relevant to providing our services safely and appropriately.

- 2.6** Consent may be provided expressly, including in writing or verbally, or may be implied from the circumstances where you voluntarily provide the information to us for the purpose of enabling us to provide the services. For example, you may consent by telling us about mobility limitations, health or safety needs, support requirements, or family representative arrangements that are relevant to decluttering, down-sizing, moving support, property access, cleaning, gardening, sale or disposal coordination, or related transition services.
- 2.7** We will only collect Sensitive Information where it is reasonably necessary for our services or otherwise permitted by law. For example, where it is unreasonable or impracticable to obtain your consent and your life is in serious danger (as set out in APP 3).
- 2.8** If you do not provide Sensitive Information that is reasonably necessary for us to provide the services safely or appropriately, we may be unable to provide some or all of the services, or we may need to modify, suspend or decline the services.
- 2.9** We will not use or disclose Sensitive Information for a purpose unrelated to our services unless the individual has consented, we are required or authorised by law to do so, or another exception under the Privacy Act applies.

3. How We Collect and Hold Your Personal Information

- 3.1** Colomba collects Personal Information from you in a variety of ways, including when you interact with us electronically or in person, when you access our website and when we provide our services to you. We may receive Personal Information from third parties. If we do, we will protect it as set out in this Privacy Policy.
- 3.2** Examples of how we may receive your Personal Information includes through website enquiries, phone calls, emails, in-home consultations, information provided in the context of service agreements, or information via representatives, family members, attorneys/guardians, subcontractors and third-party providers.

4. The purposes for which Personal Information is collected, held, used and disclosed

- 4.1** Colomba may use Personal Information collected from you to provide you with information, updates, and our services. We may use your Personal Information to improve our products and services and better understand your needs.
- 4.2** Colomba may use your Personal Information in order to deliver services relating to decluttering, downsizing, moving support, sale/disposal coordination, cleaning, gardening and related transitional services. We may also use your Personal Information for the purposes of invoicing, payment processing, safety management, dispute management and legal compliance.
- 4.3** Colomba may contact you by a variety of measures including, but not limited to telephone, e-mail, SMS, or mail.

5. Disclosure of Your Personal Information

- 5.1** We may disclose your Personal Information to any of our employees, officers, insurers, professional advisors, agents, suppliers, or subcontractors insofar as reasonably necessary for the purposes set out in this Privacy Policy, and in order to provide the services. Personal Information is only supplied to a third party when it is required for the delivery of our services.
- 5.2** We may from time to time need to disclose Personal Information 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.
- 5.3** If there is a change of control in our business or sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our user databases, together with any Personal Information and non-Personal Information contained in those databases. This information will only be disclosed to a potential purchaser on a confidential basis and subject to appropriate confidentiality obligations.
- 5.4** By providing us with Personal Information, you consent to the terms of this Privacy Policy and the types of disclosure covered by this Policy. Where we disclose your Personal Information to third parties, we will request that the third party follow this Policy regarding handling your Personal Information.

6. Security of Your Personal Information

- 6.1** Colomba is committed to ensuring that the information you provide to us is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure information and protect it from misuse, interference, loss and unauthorised access, modification, and disclosure.
- 6.2** While we take reasonable steps to protect Personal Information, the transmission of information over the internet is not completely secure. Any information you transmit to us electronically is transmitted at your own risk. Once we receive your information, we will take reasonable steps to protect it in accordance with this Privacy Policy, the Privacy Act 1988 (Cth) and the APPs.

7. Access to Your Personal Information

- 7.1** You may request details of Personal Information that we hold about you in accordance with the provisions of the Privacy Act 1988 (Cth). A small administrative fee may be payable for this provision of information. In accordance with APP 13, we do not charge any fees for correcting Personal Information that is inaccurate, out of date, incomplete, irrelevant or misleading. If you would like a copy of the information, which we hold about you or believe that any information we hold on you is inaccurate, out of date, incomplete, irrelevant, or misleading, please mail us at info@colomba.com.au.
- 7.2** We reserve the right to refuse to provide you information we hold about you, in certain circumstances set out in the Privacy Act.

8. Complaints About Privacy

- 8.1** If you have a complaint about the way we have collected, held, used, disclosed, secured, accessed or corrected your Personal Information, or if you believe that we have breached the Privacy Act 1988 (Cth) or the APPs, please contact us in writing at info@colomba.com.au.
- 8.2** Please include sufficient details of your complaint, including your name and contact details, the nature of your concern, the relevant date or circumstances, and the outcome you are seeking.

We may ask you to provide further information so that we can properly assess and respond to your complaint.

- 8.3** We take privacy complaints seriously. We will acknowledge your complaint within a reasonable time after receiving it and will investigate and respond to your complaint as soon as reasonably practicable. We will endeavour to provide a written response within 30 days after receiving your complaint. If we require more time because of the nature or complexity of the complaint, we will let you know.
- 8.4** We will handle your complaint fairly, confidentially and in accordance with our obligations under the Act and APPs.
- 8.5** If you are not satisfied with our response, or if we do not respond to your complaint within 30 days, you may lodge a complaint with the Office of the Australian Information Commissioner. The OAIC can be contacted at www.oaic.gov.au, by email at enquiries@oaic.gov.au, or by post at GPO Box 5288, Sydney NSW 2001.

9. Changes to Privacy Policy

- 9.1** Please be aware that we may change this Privacy Policy in the future, at all time aligning with our obligations under the Act. We may modify this Policy at any time, in our sole discretion and all modifications will be effective immediately upon our posting of the modifications on our website. Please check back from time to time to review our Privacy Policy.

10. Website

- 10.1** When you use our website, www.colomba.com.au, we may collect certain information such as browser type, operating system, website visited immediately before coming to our site, etc. This information is used in an aggregated manner to analyse how people use our site, such that we can improve our service.
- 10.2** We may from time to time use cookies on our website. Cookies are very small files which our website uses to identify you when you come back to the site, and to store details about your use of the site. Cookies are not malicious programs that access or damage your computer. Most web browsers automatically accept cookies, but you may choose to reject cookies by changing your browser settings. However, this may prevent you from taking full advantage of our website. Our website may from time to time use cookies to analyse website traffic and help us provide a better website visitor experience. In addition, cookies may be used to serve relevant ads to website visitors through third party services, such as Google AdWords. These ads may appear on this website or other websites you visit.
- 10.3** Our site may from time to time have links to other websites not owned or controlled by us. These links are meant for your convenience only. Links to third party websites do not constitute sponsorship or endorsement or approval of these websites. Please be aware that Colomba is not responsible for the privacy compliance of other such websites.