

# Privacy Policy

**Lletly**

**Operated by Pierpoint Group Pty Ltd**

**Website: Lletly.com**

**Last updated: 5 May 2026**

## 1. About this Privacy Policy

Lletly, operated by Pierpoint Group Pty Ltd, referred to in this Privacy Policy as "Lletly", "we", "us" or "our", values our customers and respects your privacy.

This Privacy Policy explains how we collect, hold, use, disclose, store and protect personal information when you visit or use Lletly.com, create an account, list a property, make or manage a booking, verify your identity, communicate through our platform, use our payment services, or otherwise interact with us.

We operate in Australia and handle personal information in accordance with the Privacy Act 1988 (Cth), the Australian Privacy Principles, and other applicable Australian laws.

This Privacy Policy applies to:

- guests and travellers;
- hosts, property owners and property managers;
- visitors to Lletly.com;
- people who contact us or interact with us;
- people whose information is provided to us by another user, such as additional guests;
- business users, suppliers, contractors, service providers and other platform participants.

Lletly is available only to users who are 18 years of age or older. Guests and hosts must be at least 18 years old to create an account, make a booking, list a property, host guests or otherwise use the Lletly platform.

## 2. Personal information we collect

The personal information we collect depends on how you use Lletly.

### 2.1 Account, contact and profile information

We may collect:

- full name;
- email address;
- phone number;

- residential, postal or billing address;
- date of birth;
- profile photo;
- username, password and account login details;
- account settings;
- communication preferences;
- emergency contact details, where provided;
- information you provide when completing forms, creating listings or updating your account.

## 2.2 Booking and stay information

When you search, request, make, manage or complete a booking, we may collect:

- booking dates;
- check-in and check-out details;
- guest numbers;
- property selected;
- booking price;
- service fees;
- host charges;
- taxes, GST, state or territory levies and other charges;
- booking status;
- cancellation, refund and dispute information;
- special requests;
- messages between guests and hosts;
- complaints, claims, incident reports and safety reports;
- reviews, ratings and feedback;
- information about other people included in the booking.

Where you provide personal information about another person, you must ensure that you have authority to provide that information and that the person understands that their information may be handled in accordance with this Privacy Policy.

## 2.3 Host, property and listing information

If you are a host, property owner, property manager or business user, we may collect:

- property address and listing location;
- property description, photos, availability and pricing;
- ownership, management or authority-to-list information;
- registered business name, ABN, ACN or trading name;
- GST registration status and tax information;

- payout information;
- Stripe Connect information;
- short-term rental accommodation registration numbers;
- council permits;
- property licences;
- planning approvals or other property-related approvals;
- insurance information, where relevant;
- information required to comply with short-term rental accommodation laws, state or territory

levy obligations, tax reporting, local council requirements or other legal obligations.

Hosts must provide accurate and current STRA registration numbers, council permits, ABNs, GST details, property licence information and any other required compliance information where applicable.

## 2.4 Identity verification information

To promote trust and safety, prevent fraud, verify users and comply with applicable laws, we may collect identity verification information, including:

- government-issued photo identification;
- passport, driver licence, proof of age card, national identity document or other government ID;
- document number, issuing country, expiry date and other details displayed on the ID;
- selfie, live facial image or facial photograph used for identity verification;
- verification result, verification status and fraud-risk indicators;
- information generated by our in-house ID verification and facial comparison process;
- information received from Australian authorities, regulators, government databases or other

lawful verification sources where permitted or required by law.

Lletly uses its own in-house designed ID verification and facial recognition software for identity verification.

During verification, we may ask you to provide a selfie, live facial image or facial photograph. We use that image only to compare it against the photo shown on your government-issued ID.

Lletly does not store the selfie, live facial image or facial photograph after the comparison process is completed.

Lletly does store the government-issued photo ID and the verification outcome for trust, safety, fraud prevention, STRA compliance, legal compliance, dispute management, authority requests and platform integrity purposes.

Facial recognition and biometric information may be sensitive information under Australian

privacy law. We will seek consent where required and will use this information only for purposes connected with identity verification, fraud prevention, safety, legal compliance, platform integrity, dispute management and protecting our users.

If you do not provide identity verification information when requested, we may be unable to verify your account, approve a booking, allow you to host, process a payout, complete a transaction, or provide certain services.

## **2.5 Payment, transaction and payout information**

We use Stripe for payment processing. We may collect or receive information related to payments, transactions, refunds, chargebacks and payouts, including:

- payment amount;
- booking charges;
- service fees;
- commissions;
- GST;
- taxes;
- state or territory levies;
- billing address;
- transaction date and time;
- payment method type;
- limited card details, such as card type and last four digits;
- payment status;
- refund status;
- payout status;
- Stripe customer ID;
- Stripe connected account ID;
- Stripe payment reference;
- fraud screening results;
- chargeback or dispute information.

Where payments are processed by Stripe, Stripe may collect and process personal information in accordance with its own privacy policy and legal obligations.

Lletly does not intend to store full credit card numbers where payments are processed through Stripe-hosted or Stripe-secured payment services.

## **2.6 Communications and support information**

When you communicate with us, with a host, with a guest, or through the Lletly platform, we may collect:

- emails;

- messages;
- chat content;
- support requests;
- telephone call details;
- attachments or documents you provide;
- complaints, disputes and incident reports;
- records of our responses;
- date, time and method of communication.

We may monitor, review or retain platform communications for customer support, fraud prevention, dispute resolution, safety, compliance, quality assurance and enforcement of our Terms and policies.

## **2.7 Reviews, content and public information**

We may collect information you provide or publish on the platform, including:

- reviews and ratings;
- property photos;
- profile photos;
- listing descriptions;
- comments;
- uploaded documents;
- reports or complaints;
- public profile information;
- other user-generated content.

Some information you choose to publish may be visible to other users or the public, depending on the feature used.

## **2.8 Device, technical, cookie and usage information**

When you use our website or services, we may automatically collect:

- IP address;
- device type;
- browser type;
- operating system;
- referring website;
- pages viewed;
- links clicked;
- dates and times of access;
- session information;
- approximate location derived from IP address;

- cookie identifiers;
- analytics information;
- security logs;
- error and performance data.

We may use cookies, pixels, analytics tools and similar technologies to operate the website, improve performance, remember preferences, understand usage, detect fraud, secure accounts and support marketing.

## **2.9 Analytics, advertising, email, SMS, hosting and plugins**

We may use third-party services and plugins from time to time, including:

- Google Analytics;
- Meta Pixel;
- email marketing tools;
- SMS and messaging tools;
- cloud hosting providers;
- security plugins;
- analytics and reporting tools;
- customer support tools;
- advertising and retargeting tools;
- website performance and monitoring tools.

The providers we use may change over time. These providers may collect or receive information through cookies, pixels, tags, APIs, plugins or similar technologies, subject to their own privacy policies and applicable law.

## **2.10 Information from third parties**

We may receive personal information from:

- hosts, guests or other users;
- Stripe and other payment-related providers;
- Australian authorities;
- government agencies;
- short-term rental accommodation registers;
- local councils;
- tax authorities;
- fraud prevention and security providers;
- publicly available sources;
- social media or login providers, where you choose to connect them;
- business partners, service providers or professional advisers.

## 3. Why we collect and use personal information

We collect, hold, use and disclose personal information for the following purposes.

### 3.1 To provide the Lletly platform

We use personal information to:

- create and manage accounts;
- allow guests to search for and book accommodation;
- allow hosts to list and manage properties;
- process booking requests;
- confirm, manage, modify or cancel bookings;
- facilitate communication between guests and hosts;
- provide customer support;
- send booking confirmations, reminders, updates and service messages;
- manage reviews and feedback;
- process refunds, disputes and chargebacks;
- administer fees, commissions, GST, taxes, levies and payouts.

### 3.2 To verify identity and promote trust and safety

We use personal information, including government photo ID and temporary facial comparison information, to:

- verify your identity;
- confirm that an ID document appears genuine;
- compare your selfie, live facial image or facial photograph with the photo shown on your government-issued ID;
- help prevent fake accounts, fraud, scams and unauthorised use;
- protect guests, hosts, properties and the public;
- assess booking, account or payout risk;
- investigate suspicious activity;
- enforce our Terms and policies;
- manage disputes, complaints or safety incidents.

### 3.3 To process payments and payouts

We use personal information to:

- process guest payments;
- facilitate host payouts;
- manage Stripe Connect onboarding or connected accounts;
- calculate fees, commissions, taxes, GST and levies;
- issue receipts, invoices or transaction records;

- process refunds;
- manage payment disputes and chargebacks;
- detect and prevent payment fraud;
- comply with financial, tax, accounting and reporting obligations.

### **3.4 To comply with Australian laws and authority requests**

We may use and disclose personal information where required or permitted by law, including to:

- comply with Australian privacy laws;
- comply with short-term rental accommodation laws;
- validate host, guest, property or booking information with Australian authorities;
- verify STRA registration numbers, permits, licences or approvals;
- respond to lawful requests from police, regulators, courts, tribunals, councils, tax authorities or other government agencies;
- assist with investigations, enforcement, public safety or emergency situations;
- comply with tax, GST, accounting, audit and record-keeping obligations;
- prevent or investigate unlawful activity, fraud or misconduct.

### **3.5 To improve, secure and develop our services**

We use information to:

- maintain and improve Lletly.com;
- test new features;
- troubleshoot technical issues;
- improve customer experience;
- monitor platform performance;
- conduct analytics and reporting;
- protect our systems from misuse, cyber threats and unauthorised access;
- train staff and improve support processes;
- develop safety, fraud prevention and verification tools.

### **3.6 To communicate with you**

We may contact you by email, SMS, phone, platform message, push notification or other methods to:

- send booking confirmations and updates;
- respond to enquiries;
- provide customer support;
- notify you about account or security issues;
- send important policy or legal updates;
- request reviews or feedback;

- provide information relevant to your booking, listing or account.

### **3.7 Marketing and promotions**

With your consent where required, or where otherwise permitted by law, we may use your information to:

- send promotional emails or messages;
- tell you about new features, offers or services;
- personalise content or recommendations;
- measure marketing performance;
- run promotions, surveys or referral programs;
- deliver or measure advertising through tools such as Google Analytics, Meta Pixel or similar technologies.

You can unsubscribe from marketing communications at any time using the unsubscribe link or by contacting us.

You may still receive non-marketing messages, such as booking, account, safety, legal or service-related communications.

## **4. Disclosure of personal information**

We may disclose personal information to the following parties.

### **4.1 Guests and hosts**

To complete and manage bookings, we may share relevant information between guests and hosts, such as:

- name;
- booking details;
- check-in and check-out dates;
- guest number;
- contact information where necessary;
- messages;
- special requests;
- review information;
- dispute or incident information where relevant.

We do not ordinarily share copies of government ID documents, selfies, facial images, facial comparison information or biometric information with hosts or guests.

## 4.2 Stripe and payment partners

We disclose payment and transaction information to Stripe, banks, card networks, fraud screening providers and other payment-related providers to process payments, payouts, refunds, disputes, chargebacks, fraud prevention and compliance checks.

Stripe may process personal information in accordance with its own privacy policy and legal obligations.

## 4.3 In-house identity verification and facial recognition

Lletly uses its own in-house identity verification and facial recognition software.

Identity verification information, including government ID documents and verification outcomes, is stored by Lletly and used for identity verification, fraud prevention, platform safety, legal compliance, STRA compliance and dispute management.

Selfies, live facial images and facial photographs used for comparison against government photo ID are not stored after the comparison process is completed.

We do not use facial comparison information or biometric information for unrelated marketing purposes.

## 4.4 Australian authorities, regulators and law enforcement

We may disclose personal information to Australian authorities where required or permitted by law, including:

- police and law enforcement agencies;
- courts and tribunals;
- Australian Taxation Office;
- state revenue offices;
- local councils;
- short-term rental accommodation regulators;
- consumer protection regulators;
- privacy regulators;
- emergency services;
- other government bodies or public authorities.

This may include disclosure for STRA registration checks, property compliance, tax and levy obligations, fraud prevention, safety incidents, legal claims, investigations or lawful requests.

## 4.5 Service providers

We may disclose personal information to service providers who assist us with:

- website hosting;
- cloud storage;
- payment processing;

- email and SMS communications;
- analytics;
- marketing and advertising;
- cybersecurity;
- customer support;
- accounting;
- legal advice;
- insurance;
- data backup;
- software and IT support;
- website plugins and integrations.

#### **4.6 Google, Meta and similar technology providers**

We may use Google, Meta and similar providers for analytics, advertising, measurement, remarketing and performance monitoring.

These providers may collect or receive information through cookies, pixels, tags and similar technologies.

You may be able to control some tracking technologies through your browser settings, device settings, cookie consent tools, or platform-specific settings offered by Google, Meta or other providers.

#### **4.7 Professional advisers and insurers**

We may disclose information to lawyers, accountants, auditors, insurers, consultants and other professional advisers where reasonably necessary for business, legal, compliance, insurance, dispute or risk management purposes.

#### **4.8 Corporate transactions**

If Lletly or Pierpoint Group Pty Ltd is involved in a sale, merger, restructure, investment, financing, acquisition or transfer of assets, personal information may be disclosed to parties involved in that transaction, subject to confidentiality and legal requirements.

### **5. Government photo ID and facial recognition**

Lletly may require identity verification before allowing certain platform activities, including booking, hosting, receiving payouts, managing listings, or using features that involve increased trust, safety or compliance risk.

Identity verification may involve:

- collecting a copy or image of your government-issued photo ID;
- collecting a selfie, live facial image or facial photograph for comparison purposes;
- using facial comparison technology to compare your selfie, live facial image or facial photograph with your ID document;

- validating details against Australian authorities, regulators, government databases or other lawful verification sources where permitted or required;
- storing verification records and the outcome of verification checks.

Lletly does not store the selfie, live facial image or facial photograph after the comparison process is completed.

Lletly stores government-issued photo ID and verification records for trust, safety, fraud prevention, STRA compliance, legal compliance, dispute management, chargeback management, authority requests and platform integrity.

We use identity verification information for:

- trust and safety;
- identity verification;
- fraud prevention;
- legal compliance;
- STRA compliance;
- dispute management;
- chargeback management;
- platform integrity;
- protection of guests, hosts, properties and the public.

We will not use facial comparison information or biometric information for unrelated marketing purposes.

## 6. Retention of identity verification information

Because identity verification information is sensitive and important for platform safety, Lletly applies a two-level retention approach.

### Level 1 - Government photo ID records

Lletly stores copies or images of government-issued photo ID documents.

We may retain government photo ID records while your account is active and for up to 5 years after your account is closed, your last booking, your last host payout or your last transaction, whichever is later.

We may retain government photo ID records for a longer period where reasonably required or permitted for legal, regulatory, STRA compliance, fraud-prevention, safety, dispute, chargeback, investigation, enforcement, authority request or public protection purposes.

### Level 2 - Verification outcome and audit records

Lletly may retain verification outcomes, account verification status, audit logs, booking records, transaction records, host compliance records and STRA-related records.

We may retain these records while your account is active and for up to 5 years after your

account is closed, your last booking, your last host payout or your last transaction, whichever is later.

We may retain these records for a longer period where required or permitted by law, or where reasonably necessary for legal, regulatory, STRA compliance, tax, accounting, fraud-prevention, safety, dispute, chargeback, investigation, enforcement, authority request or public protection purposes.

#### Selfie and facial image retention

Lletly does not store the selfie, live facial image or facial photograph after the comparison process is completed.

The selfie, live facial image or facial photograph is used only to compare your face against the photo shown on your government-issued ID during the identity verification process.

#### Deletion or de-identification

When identity verification information is no longer required for any purpose for which it may lawfully be used or disclosed, we will take reasonable steps to delete, destroy or de-identify it, unless we are required or permitted by law to retain it.

## 7. Cross-border disclosure and overseas storage

Some of our service providers, including payment, hosting, analytics, advertising, communication, support or security providers, may store or process personal information outside Australia.

Countries may include Australia, the United States, the United Kingdom, countries in the European Union, Singapore, New Zealand and other countries where our service providers operate.

Where we disclose personal information overseas, we will take reasonable steps to ensure that overseas recipients handle personal information in a way that is consistent with applicable Australian privacy requirements, unless an exception applies.

By using our services, you understand that your personal information may be processed, stored or accessed outside Australia by us or our service providers.

## 8. Security of personal information

We take reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification and disclosure.

Depending on the information and risk involved, these steps may include:

- encryption in transit;
- access controls;
- account authentication;
- staff confidentiality obligations;

- secure payment processing through Stripe;
- restricted access to identity documents and verification records;
- monitoring and logging;
- data backups;
- security reviews;
- limiting access to staff and service providers who need the information for authorised purposes.

No website, platform or electronic storage method is completely secure. We cannot guarantee absolute security, but we work to protect the information we hold.

## 9. Accessing and correcting your personal information

You may request access to personal information we hold about you.

You may also request correction if you believe your information is inaccurate, incomplete, out of date, irrelevant or misleading.

Requests for access or correction should be sent by post to the Privacy Officer using the contact details in section 17 of this Privacy Policy.

We may need to verify your identity before responding to an access or correction request.

In some circumstances, we may refuse access or correction where permitted by law. If we refuse, we will provide reasons where legally required.

## 10. Your choices and controls

You may be able to:

- update your account details;
- correct profile information;
- change communication preferences;
- unsubscribe from marketing emails;
- delete certain content;
- close your account;
- request access to your information;
- request correction of your information;
- withdraw consent where processing is based on consent, subject to legal, contractual and operational limitations.

Withdrawing consent for identity verification, government ID storage or facial comparison may affect your ability to use parts of the platform.

For example, we may be unable to verify your account, approve a booking, allow you to host,

process a payout, complete a transaction, or provide certain services.

## 11. Cookies and tracking technologies

We use cookies and similar technologies to:

- operate the website;
- keep you signed in;
- remember preferences;
- improve website performance;
- understand how users interact with our platform;
- detect fraud and security risks;
- support analytics;
- support advertising and marketing where permitted.

We may use tools such as Google Analytics, Meta Pixel and similar technologies now or in the future. These tools may help us understand website usage, measure advertising performance, deliver relevant content and improve our services.

You may control cookies through your browser settings. Disabling cookies may affect some website features.

## 12. Direct marketing

We may send marketing communications where permitted by law.

You can opt out at any time by clicking the unsubscribe link in our emails or contacting us.

We will not send you marketing communications where you have opted out, except for service, account, booking, safety, legal or transactional messages.

## 13. Children and minors

Lletly is not directed to children or minors.

Guests and hosts must be 18 years of age or older to create an account, make a booking, list a property, host guests or use the Lletly platform.

If we become aware that a person under 18 has created an account or provided personal information, we may suspend or close the account and take reasonable steps to delete or de-identify the information, unless we are required or permitted by law to retain it.

## 14. Data breaches

If we become aware of a data breach involving personal information, we will assess the breach and take steps to contain, investigate and remediate it.

Where required under the Notifiable Data Breaches scheme, we will notify affected individuals and the Office of the Australian Information Commissioner if a data breach is

likely to result in serious harm.

## 15. Third-party websites and services

Our website may contain links to third-party websites, plugins or services, including Stripe, Google, Meta or other service providers.

We are not responsible for the privacy practices of third parties. You should review their privacy policies before providing personal information to them.

## 16. Changes to this Privacy Policy

We may update this Privacy Policy from time to time.

The updated version will be posted on Lletly.com with the "Last updated" date.

If we make significant changes, we may take reasonable steps to notify you, such as by account notice, website notice or another appropriate method.

Your continued use of the platform after changes take effect means you accept the updated Privacy Policy, to the extent permitted by law.

## 17. Complaints and contact details

If you have questions, concerns, requests or complaints about this Privacy Policy or how we handle personal information, please contact us by post:

### **Privacy Officer**

Lletly

Operated by Pierpoint Group Pty Ltd

Postal address: PO Box 756

Morwell, Victoria, Australia, 3840

Website: Lletly.com

Please mark postal correspondence to the attention of the Privacy Officer.

We will take privacy complaints seriously and aim to respond within a reasonable time.

If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner.