

PRIVACY POLICY

Your privacy matters to us. Our privacy policy sets out

- what is personal information
- what personal information we collect and hold
- how and why we collect, hold, use or disclose personal information
- what happens if we are not able to collect personal information
- how to access and correct your personal information
- whether we disclose personal information outside Australia
- how to contact us.

We are bound by the principles contained in the Privacy Act 1988 (Cth) (subject to exemptions that apply to us under that Act).

We may, from time to time, review and update this policy, including taking account of new or amended laws, new technology and/or changes to our operations. All personal information held by us will be governed by the most recent updated policy.

What is personal information?

We follow the definition in the Act. Personal information is information that can be used to personally identify you. This may include (but is not limited to) your name, age, gender, postcode and contact details (including phone numbers and email addresses) and possibly financial information, including your credit card or direct debit information.

What personal information do we collect and hold?

We may collect the following types of personal information

- name
- mailing or street address
- email address
- telephone number
- age or birth date
- profession, occupation or job title
- details of the products and services you have purchased from us or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries
- any additional information you provide to us directly through our websites or indirectly through use of our website or online presence through our representatives
- information you provide to us through surveys or visits by our representatives.

Cookies

In some cases we may also collect information through the use of cookies and other tracking devices. When you access our website, we may send a "cookie" (which is a small summary file containing a unique ID number) to your computer. This enables us to recognise your computer and

greet you each time you visit our website, without bothering you with a request to register or log-in. It also helps us keep track of products or services you view, so that we can send you news about those products or services. We also use cookies to measure traffic patterns, to determine which areas of our websites have been visited, and to measure transaction patterns in the aggregate. We use this to research our users' habits so that we can improve our online products and services. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them. We may also log IP addresses (the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track user movements, and gather broad demographic information.

We may also collect anonymous data (which is not personal information) relating to your activity on our websites (including IP addresses) via cookies, or we may collect information from you in response to a survey. We generally use this information to report statistics, analyse trends, administer our services, diagnose problems and target and improve the quality of our products and services. To the extent this information does not constitute personal information because it does not identify you or anyone else, the Australian Privacy Principles do not apply and we may use this information for any purpose and by any means.

How we collect personal information

We collect your personal information directly from you unless it is unreasonable or impractical to do so. We do this

- through your access and use of our website, apps or sending SMS/MMS to us
- during conversations between you and our representatives
- when you complete a form or insertion order.

We may also collect personal information from third parties including

- third party companies such as credit reporting agencies, law enforcement agencies and other government entities
- advertisers
- mailing lists
- recruitment agencies
- contractors and business partners.

Why do we collect, hold, use and disclose personal information?

We collect information about you to enable us to perform our business activities and functions and to provide best possible quality. We collect, hold, use and disclose your personal information for the following purposes:

- to provide products and services to you
- to provide you with news, information or advise about our existing and new products and services
- to communicate with you, including but not limited to, by email, mail, SMS or telephone
- to manage and enhance our products and services
- to personalise and customise your experience
- to provide you with access to protected areas of our websites

- to conduct competitions or promotions
- to verify your identity
- to provide as part of business data to third parties if you have authorised us to do so
- to conduct business processing functions for operation of our websites or our business
- for our administrative, marketing (including direct marketing), promotional, planning, product/service development, quality control and research purposes, or those of our contractors or external service providers
- to provide your updated personal information to us, our contractors or external service providers
- to investigate any complaints about or made by you, or if we have reason to suspect that you are in breach of any of our terms and conditions or that you are or have been otherwise engaged in any unlawful activity
- as required or permitted by any law (including the Privacy Act).

We will never share, sell, rent or disclose your personal information other than as described in this policy.

What happens if we can't collect your personal information?

If you do not provide us with the personal information described in this policy, we may not be able to

- provide you with the products or services you requested, either to the same standard, or at all
- provide you with information about products and services that you may want, including information about discounts sales or special promotions or
- tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful.

How do we disclose your personal information?

We may disclose your personal information to

- our employees, related bodies corporate, partnerships, joint venture entities, contractors or external service providers for the operation of our websites or our business, fulfilling requests by you, and otherwise provide products and services to you, including without limitation, web hosting providers, IT systems administrators, mailing houses, newsagents, couriers, payment processors, photographic analysers, data entry service providers, electronic network administrators, debt collectors, and professional advisers such as accountants, solicitors, business advisors and consultants
- our existing or potential agents and/or business partners
- our sponsors, or promoters of any competition that we conduct or promote via our services
- specific third parties authorised by you to receive information held by us
- the police, any relevant authority or enforcement body, or your Internet Service Provider or network administrator, for example, if we have reason to suspect that you have committed a breach of any of our terms and conditions, or have otherwise been engaged in any unlawful activity, and we reasonably believe that disclosure is necessary
- as required or permitted by any law (including the Privacy Act).

Direct marketing materials

We may send you direct marketing communications and information about products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS or email, in accordance with applicable marketing laws, such as the Spam Act 2004 (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.

At any time, you may opt-out of receiving marketing communications from us by [contacting us](#) or by using the opt-out facilities provided (e.g. an unsubscribe link). We will then ensure that your name is removed from our mailing list. We do not provide your personal information to other organisations for the purpose of direct marketing unless authorised by you.

If you receive communications from us that you believe have been sent to you other than in accordance with this policy, or in breach of any law, please [contact us](#).

Accessing and correcting your personal information

You may request access to any personal information we hold about you at any time by [contacting us](#). Where we hold information that you are entitled to access, we will try and provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We will not charge for simply making a request and will not charge for making any corrections to your personal information. If you make an access request, we will ask you to verify your identity. There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others, or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment, then we will add a note to the personal information stating that you disagree with it.

How You can Complain about a Breach of Privacy?

If you believe your privacy has been breached by us, have any questions or concerns about our Privacy Policy please, please [contact us](#) with details of the incident so that we can investigate it.

We have a formal complaints procedure. We will endeavour to resolve all investigations within a reasonable time.

We will treat your requests or complaints confidentially. Our representatives will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved.

Disclosure of personal information outside Australia

We may disclose personal information to our related bodies corporate, partnerships, joint venture entities and external service providers located overseas for some of the purposes listed above. We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

We may disclose your personal information to entities located outside of Australia, including the following

- our data hosting and Cloud-based IT service providers
- other external service providers located in the Philippines and USA and
- other third parties operating in jurisdictions including China, India, Indonesia, New Zealand, Hong Kong and the United States where you have authorised us to do so.

Security

We will take all reasonable steps to protect the personal information that we hold from misuse, loss or unauthorised access, including by means of firewalls, password access, secure servers and encryption of credit card transactions.

If you suspect any misuse or loss of, or unauthorised access to, your personal information, please let us know immediately.

Links

Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

Changes to our Privacy Policy

We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website.