



PEEQ PRIVACY POLICY

At PEEQ Pty Ltd (ACN 155 317 614) (“**PEEQ**”, “**we**”, “**our**”, “**us**”) we recognise the importance of your privacy and understand your concerns about the security of the personal information you provide to us.

All personal information collected by us will be treated in accordance with the Australian Privacy Principles (“**APPs**”) as contained in the *Privacy Act 1988* (Cth). The APPs detail how personal information may be collected, used, disclosed, stored and destroyed, and how an individual may gain access to or make complaints about the personal information held about them.

This policy details the type of personal information we collect, how we manage personal information about you, with whom we may share it and the choices available to you regarding our use of the information. We also describe the measures we take to safeguard your personal information and tell you how to contact us regarding our privacy practices.

1. Types of personal information we collect and hold

“**Personal information**” is information or an opinion about an identified individual, or about an individual who is reasonably identifiable, whether true or not, and whether recorded in a material form or now. Information where we have removed any reference to a person, so that the person cannot be reasonably identifiable from the information, is not personal information.

“**Sensitive information**”, a sub-set of personal information, is information or an opinion about an individual’s racial or ethnic origin, political opinions, political association membership, religious beliefs or affiliations, philosophical beliefs, professional or trade association membership, trade union membership, sexual orientation or practices or criminal record, and includes health information and genetic information.

The kinds of personal information that we may collect and hold from you or about you include:

- contact information, such as your name, postal address, e-mail address and telephone number;
- date of birth;
- banking details; and

- any other personal information submitted to us by you.

We may collect sensitive information from or about you where there is a legal requirement to do so, or where we are otherwise permitted by law. In all other situations, we will specifically seek your express consent.

2. Website

When you browse our website or contact us electronically, we may record geographical tagging, cookies and statistical data. This may include your IP address, date and time of your visit, operating system, language preferences, device characteristics, pages visited, information downloaded and type of browser used to access the website.

We use this information to help us to make decisions about maintaining and improving our website and online services.

While our website may contain links to other websites with the exception of our related entities, those websites are not subject to our privacy standards, policies and procedures. We recommend that you make your own enquires as to the privacy policies of these third parties and we are in no way responsible for the privacy practices of these third parties.

3. How we collect and hold personal information

We aim to collect personal information only directly from you, unless it is unreasonable or impracticable for us to do so. For example, we collect personal information about you from:

- information you disclose to us via the website;
- emails from you to us;
- telephone calls with us; and
- hardcopy or softcopy forms submitted to us by you.

However, in some circumstances, it is necessary for us to collect personal information through third parties or from a source of publicly available information.

If we receive personal information that we have not requested (unsolicited information) and we determine that we could not have collected that information under the APPs if we had requested it, then we will destroy or de-identify the information if it is lawful and reasonable to do so.

You can choose to be anonymous or use a pseudonym when dealing with us, unless:

- the use of your true identity is a legal requirement; or
- it is impracticable for us to deal with you on such a basis.

On all occasions, your personal information will be collected, held, used and disclosed by us in accordance with this Privacy Policy and the APPs.

4. Why we collect, hold, use and disclose personal information

We collect, hold, use and disclose personal information from you or about you where it is reasonably necessary for us to carry out our business functions and activities and as necessary to provide our services to you.

We also collect, hold, use and disclose your personal information for related purposes that you would reasonably expect, such as our administrative and accounting functions and statistical collection.

If we do not collect, hold, use or disclose your personal information, or if you do not consent, then we may not be able to answer your enquiry, complete the transaction you have entered into, or provide our services to you to the best of our ability.

We may also use your personal information for marketing and promotional activities. When we do so, you can opt out at any time by notifying us. Opt out procedures are also included in our marketing communications. If you do not want us to use your information for marketing purposes, or share your information with related companies for their own marketing purposes, please notify us by sending an email to contact email listed below.

5. Disclosure of Personal Information

We respect the privacy of personal information and will take reasonable steps to keep it strictly confidential.

We will only disclose personal information to third parties if it is necessary for the primary purpose of collecting the information, or for a related secondary purpose if the disclosure could be reasonably expected. Where such a disclosure is necessary, we will require that the third party undertake to treat the personal information in accordance with the APPs.

If we disclose the personal information to overseas recipients, we will protect that information as described in this Privacy Policy and in accordance with applicable law. We will also require that any overseas recipient undertakes to treat the personal information in accordance with the APPs.

Otherwise, we will only disclose your personal information to third parties without your consent if the disclosure is:

- necessary to protect or enforce our legal rights or interests or to defend any claims;
- necessary to prevent or lessen a serious threat to a person's health or safety;
- required or authorised by law; or
- permitted by another exception in the Privacy Act.

Where we wish to use or disclose your personal information for other purposes, we will obtain your consent.

6. How we hold and protect personal information

Your personal information is held and stored on paper, by electronic means, or both. We have physical, electronic and procedural safeguards in place for personal information and take reasonable steps to ensure that your personal information is protected from misuse, interference, loss and unauthorized access, modification and disclosure. These include the following:

- data held and stored on paper is stored in lockable offices and in secure premises;
- data held and stored electronically is protected by internal and external firewalls, limited access via file passwords, and files designated read-only or no access;
- data held and stored “in the cloud” is protected by internal and external firewalls, limited access via file passwords and files designated read-only or no access. We also require our IT contractors and other third parties to implement privacy safeguards;
- where we disclose personal information to third parties (including contractors and affiliated businesses located locally and overseas), our contractual arrangements with them include specific privacy requirements; and
- our staff receive training on privacy procedures.

7. Destruction and De-identification

We will retain your personal information whilst it is required for any of our business functions, or for any other lawful purpose.

We use secure methods to destroy or to permanently de-identify your personal information when it is no longer needed, such as the following:

- paper records are shredded or destroyed securely; and
- electronic records are deleted from all locations, to the best of our ability, or encrypted and/or placed beyond use.

8. Requests for access and correction

We have procedures in place for dealing with and responding to requests for access to, and correction of, the personal information held about you.

In most cases, we expect that we will be able to comply with your request. However, if we do not agree to provide you access or to correct the information as requested, we will give you written reasons why. For example, a request to access personal information may be rejected if:

- the request is frivolous or vexatious;

- providing access would have an unreasonable impact on the privacy of another person;
- providing access would pose a serious and imminent threat to the life or health of any person;
- providing access would prejudice our legal rights; or
- there are other legal grounds to deny the request.

To assist us to keep our records up-to-date, please notify us of any changes to your personal information.

9. Additional information regarding Credit/Payment Information.

This Privacy Policy also applies in relation to our collection and use of credit information of individuals, in connection with commercial credit provided by us.

The types of credit information that we collect and use for the purpose of collecting payments and/or making payments include:

- names, addresses and other contact details of accountholders (both prospective and current);
- bank account details;
- driver's licence details; and
- financial information.

Such information is collected from you, as well as from authorised persons for an organisation. We use the information collected to make payments or send bills.

We do not disclose credit information to credit reporting bodies.

Complaints and Concerns

We have procedures in place for dealing with complaints and concerns about our practices in relation to the Privacy Act and the APPs. We will respond to your complaint in accordance with the relevant provisions of the APPs.

Contact

If you have any questions about this Privacy Notice, or if you would like us to update information we have about you or your preferences, please contact us by:

E-mailing us at privacy@peeq.global; or

Calling us +61 1300 363 700.