



Goodments Privacy Policy Effective date: December 2017

This Privacy Policy applies to Goodments Pty Ltd [ABN 67 716 000 138] ['us' 'we' or 'our']. It sets out how we collect, use, store and disclose your personal information as we are required under the Privacy Act 1988 [Cth] ['Privacy Act']. When you provide personal information to us, we will collect, use and disclosure of your personal information in accordance with this Privacy Policy and any other arrangements that apply between us.

We are committed to respecting and maintaining your privacy.

What is personal information

Personal information includes information or an opinion about an individual who is reasonably identifiable.

What personal information do we collect?

We only collect personal information to the extent that this is reasonably necessary for one or more of our functions or activities. This generally does not include sensitive information, but may include the following types of personal information:

- your name;
- your mailing or street address, email address, phone number and other contact details;
- your age or date of birth;
- your social media information, information you provide on your Goodments profile as well as financial information;
- details relating to the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries;
- any additional information relating to you that you provide to us directly through our website or app or indirectly through your use of our website or app or online presence or through other websites or accounts from which you permit us to collect information;
- information you provide to us through customer surveys or competitions; or
- any other personal information that may be required in order to facilitate your dealings with us, or to deliver you an effective service, such as your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information.

You have a right to deal with us anonymously, but if you do so, we may be unable to assist you with account related matters, or provide you with any financial services.

How we collect your personal information

We may collect these types of personal information either directly from you, or where it is impractical to do so, from third parties. We may collect this information when you:

- register on our website or app;
- communicate with us through correspondence or email, or when you share information with us from other social applications, services or websites;
- interact with our sites, services, content and advertising; or
- invest in our business or enquire as to a potential investment in our business.

Unsolicited information

If we collect any unsolicited personal information, we must determine whether we could have collected the information under APP 3. If not, we must promptly destroy or de-identify the information. Otherwise we may hold the information, and afford it the same protection as other personal information we have collected.

Our purpose for collection and holding personal information

We may collect personal information (other than as required by law) to:

- enable you to access and use our website and services;
- operate, protect, improve and optimise our website and services, our business and our users' experience (such as to perform analytics, and conduct research) and to allow for permitted advertising and marketing;
- send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- send you marketing and promotional messages and other information that may be of interest to you, including information sent on behalf of our business partners that we think you may find interesting;
- administer rewards, surveys, contests, or other promotional activities or events sponsored or managed by us or our business partners;
- comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties; and
- consider your employment application (where applicable).

Use and disclosure of personal information

We only use and disclose personal information for the purposes connected with the primary purpose of collection, or a reasonably related secondary purpose, or where otherwise permitted to do so by law. Secondary purposes might include controlled disclosure to maintenance personnel or other

thirdparty contractors (including outsourced and cloud service providers) during the course of their providing technical or other support services to us.

We may disclose personal information for the purposes described in this privacy policy to:

- our employees, related bodies corporate;
- third party suppliers, data, system and service providers (including providers for the operation or optimisation of our websites and/or our business or in connection with providing o you or improving our products and services, for example, Google, Mixpanel, Visual Studio and Sustainalytics);
- professional advisers, brokers and agents;
- payment systems operators (e.g. merchants receiving card payments);
- a potential or actual future funder or purchaser of our assets or businesses (or any part of them);
- specific third parties authorised by you to receive information held by us; and/or
- other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

Use of your personal information for direct marketing

Where we are permitted to do so, we may send you direct marketing communications and information about our service and products, and the services and products of our carefully selected business partners. This communication may be electronic (eg emails and SMS) or postal, and will be undertaken in accordance with the Spam Act and the Privacy Act. You may opt-out of receiving marketing materials from us by contacting us using the details set out below or by using the opt-out facilities provided (e.g. an unsubscribe link).

Storage of data and disclosure of personal information outside Australia

Typically, we will store personal information with cloud-based hosts such as Azure and AWS, which are generally Australian based. Some of our service providers may also store data overseas in countries such as (but not limited to) the United States. The location in which cloud data may be hosted is unascertainable. We take reasonable measures to require that service providers comply with the Privacy Act.

Employee records

In accordance with the Privacy Act, this policy does not apply to our acts and practices directly related to a current or former employment relationship between us and an employee, or to an employee record held by us relating to the employee.

Using our website and cookies

We may collect personal information about you when you use and access our website. While we do not use browsing information to identify you personally, we may record certain information about your

use of our website, such as which pages you visit, the time and date of your visit and the internet protocol address assigned to your computer.

We may also use 'cookies' or other similar tracking technologies on our website that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser but our websites may not work as intended for you if you do so.

We may also use cookies to enable us to collect data that may include personal information. We will handle any personal information collected by cookies in the same way that we handle all other personal information as described in this Privacy Policy.

Security

We may hold your personal information in either electronic or hard copy form. We take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure and we use a number of physical, administrative, personnel and technical measures to protect your personal information. For example, we encrypt all data and use secured storage facilities. While we take these steps, we cannot guarantee the security of your personal information.

Links

Our website and apps may contain links to websites operated by third parties. Those links are provided for convenience and may not be current or accurate. We are not responsible for third party websites, or the privacy practices of the respective hosts. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, so we encourage individuals to read them before using those websites.

Accessing or correcting your personal information

You can access or edit the personal information we hold about you by updating your profile on the Goodments app or by contacting us on our details below. Sometimes, we may not agree to provide you with access to all of your personal information and, where this is the case, we will tell you why. We may also need to verify your identity when you request your personal information. If you think that any personal information we hold about you is inaccurate, please contact us and we will take reasonable steps to ensure that it is corrected.

Openness

From time to time, we may change our policy on how we handle personal information or the types of personal information which we hold. Any changes to our policy will be published on our website. You may obtain a free copy of our current policy from our website or by contacting us on the details below. It is your responsibility to check the website from time to time in order to determine whether there have been any changes.

Making a complaint

If you think we have breached the Privacy Act, or you wish to make a complaint about the way we have handled your personal information, you can contact us at enquiries@goodments.com. Please include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint within a reasonable period of time. If you think that we have failed to resolve the complaint satisfactorily, you can telephone the Commonwealth Privacy Commissioner's hotline on 1300 363 992 or our external dispute resolution scheme, which is the Financial Ombudsman Service Australia ('FOS'), who can be contacted at GPO Box 3 Melbourne Victoria 2001, or emailed at info@fos.org.au or phoned on 1800 367 287.

Contact us

For further information about our Privacy Policy or practices, or to access or correct your personal information or make a complaint, please contact us at enquiries@goodments.com.