

Goodments Privacy Policy Effective date: 1 March 2022

Our Privacy Policy applies to Goodments by Douugh and Goodments Academy ('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 disclose your personal information in accordance with this Privacy Policy and any other arrangements that apply between us.

This notice applies across all websites that we own and operate and all services we provide, including mobile apps, and any other apps or services we may offer (for example, events or training), as well as in relation to all offers and third-party relationships.

We may need to update this notice from time to time. Where a change is significant, we'll make sure we let you know – usually by sending you an email.

Goodments (Goodments by Douugh) and Goodments Academy are 100% owned by Douugh Limited ABN 67 716 000 138.

This Privacy Policy replaces all previous versions, and our latest version is available from our website.

What is personal data and personal information

When we say 'personal data' we mean identifiable information about you, like your name, email, address, telephone number, bank account details, payment information, support queries, community comments and so on. If you can't be identified (for example, when personal data has been aggregated and anonymised) then this notice doesn't apply.

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.

The majority of information we collect, we collect directly from you. Sometimes we might collect personal data about you from other sources, such as publicly available materials or trusted third parties like a marketing and research partner. We use this information to supplement the personal data we already hold about you, in order to better inform, personalize and improve our services, and to validate the personal data you provide.

Where we collect personal data, we'll only process it:

- to perform a contract with you, or
- where we have legitimate interests to process the personal data and they're not overridden by your rights, or
- in accordance with a legal obligation, or
- where we have your consent.

If we don't collect your personal data, we may be unable to provide you with all our services, and some functions and features on our websites may not be available to you.

If you're someone who doesn't have a relationship with us, but believe that a Goodments subscriber has entered your personal data into our websites or services, you'll need to contact that us at enquiries@goodments.com for any questions you have about your personal data (including where you want to access, correct, amend, or request that the user delete, your personal data)

Why we collect and hold your 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 optimize 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).

The 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 third-party contractors (including outsourced and cloud service providers) during the course of their providing technical or other support services to us, or where opted in by you with third party service and product providers.

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 optimization of our websites and/or our business or in connection with providing to you or improving our products and services. Examples of these providers include but is not limited to; Google, Facebook, Apple, Android, Mixpanel, Visual Studio, Stackify, Salesforce, Green ID (Vix verify);
- professional advisers, brokers and agents;
- third party product and service providers where authorized by you via opt – in
- 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 authorized by you to receive information held by us; and/or
- other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorized or permitted by law.

We don't expect that we will collect your sensitive or health information as a matter of course, however if this occurs (for example, sensitive information may be evident from other materials we collect), we will ensure that such collection, and our use and disclosure, will comply with relevant laws.

We will generally collect the above types of personal information from you directly, when you engage with us or use our website. However, there are some circumstances in which we might collect personal information about you from third parties, our related bodies corporate, or service providers that help us to verify your identity, process transactions or provide marketing services. From time to time we may also collect information about you from publicly available sources.

You are not required to provide us with your personal information. However, if you don't, or we can't otherwise collect your information, it may affect our ability to engage you or provide you with our Services.

Retaining and deleting your information

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.

Once we no longer need it for any of the purposes described in this Privacy Policy (or otherwise communicated to you), we will permanently delete or destroy the personal information we hold about you, unless otherwise required by law. By law, businesses must retain records for at least 7 years.

How we can share your data

There will be times when we need to share your personal data with third parties. We will only disclose your personal data to:

- other companies in the Douugh Limited group of companies
- third party service providers and partners who assist and enable us to use the personal data to, for example, support delivery of or provide functionality on the website or services, or to market or promote our goods and services to you
- regulators, law enforcement bodies, government agencies, courts or other third parties where we think it's necessary to comply with applicable laws or regulations, or to exercise, establish or defend our legal rights. Where possible and appropriate, we will notify you of this type of disclosure
- an actual or potential buyer (and its agents and advisers) in connection with an actual or proposed purchase, merger or acquisition of any part of our business
- We will not share data with third parties that use the Advertising identifier (IDFA or IFA) in their SDKs or embedded code, without your permission.
- other people where we have your consent.

Using 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).

Unsolicited information

If we collect any unsolicited personal information, we must determine whether we could have collected the information under APP 3, which are the Australian rules for the collection of solicited personal information. 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.

International Data Transfers

When we share data, it may be transferred to, and processed in, countries other than the country you live in – such as to the United States, where our data hosting provider's servers are located. These countries may have laws different to what you're used to. Rest assured, where we disclose personal data to a third party in another country, we put safeguards in place to ensure your personal data remains protected.

For individuals in the European Economic Area (EEA), this means that your data may be transferred outside of the EEA. Where your personal data is transferred outside the EEA, it will only be transferred to countries that have been identified as providing adequate protection for EEA data (like Australia), or to a third party where we have approved transfer mechanisms in place to protect your personal data –i.e, by entering into the European Commission's Standard Contractual Clauses, or by ensuring the entity is Privacy Shield certified (for transfers to US-based third parties). For further information, please contact us using the details set out in the Contact us section below.

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.

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 recognize 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.

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.

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.

Your rights

It's your personal data and you have certain rights relating to it. When it comes to marketing communications, you can ask us not to send you these at any time – just follow the unsubscribe instructions contained in the marketing communication, or send your request enquiries@goodments.com

You also have rights to:

- know what personal data we hold about you, and to make sure it's correct and up to date
- request a copy of your personal data, or ask us to restrict processing your personal data or delete it
- object to our continued processing of your personal data

You can exercise these rights at any time by sending an email to enquiries@goodments.com

If you're not happy with how we are processing your personal data, please let us know by sending an email enquiries@goodments.com. We will review and investigate your complaint and try to get back to you within a reasonable time frame. You can also complain to your local data protection authority. They will be able to advise you how to submit a complaint.

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.

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.

How to contact us

We're always keen to hear from you. If you're curious about what personal data we hold about you or you have a question or feedback for us on this notice, our websites or services, please get in touch.

As a technology company, we prefer to communicate with you by email – this ensures that you're put in contact with the right person, in the right location, and in accordance with any regulatory time frames.

Our email is enquiries@goodments.com