

## 1. Introduction

This document is the Jamesdaisy Pty Ltd Privacy Policy ("**Policy**"), which applies under the Australian Privacy Principles.

The Policy sets out how Jamesdaisy Pty Ltd collects and processes Information about you, when you engage with us. For example, if you visit our website; use our apps on mobile phones; or access our social media where this Policy is posted. By continuing to engage with us, you consent to your Information being collected, processed and/or shared in accordance with this Policy.

## 2. Information we collect

We collect two types of information: Personally Identifiable Information – this is any information that, by itself, identifies you or would easily enable someone to contact and/or identify you, such as your name, email address or phone number; and Non-Personally Identifiable Information – this refers to all other information about you that you may provide to us or that we may collect from you.

In this Policy, both kinds are known as "**Information**".

You may actively give us Information about yourself when you create an account and become a Member ("**Membership Account**") with us; respond to a customer survey; email us; or post on any of our social media in a public forum. In this Policy, these types of engagements with us are known as "**Engagements**".

The Information that you provide may include, but not be limited to, your name, gender, date of birth, email address, telephone number, delivery address, billing address and payment information, and login and password.

Please note also that Information you disclose in public chat and similar forums is accessible by anyone, including third parties not bound by this Policy.

In any Engagements by you, we may also automatically collect the following Information even if you have not actively given it to us: your IP address, log-in information, location information (for example, via GPS or Wi-Fi), browser type and version, browser plug-in types and versions, operating system and platform, information about your visit including the URL clickstream to, through and from one of our Engagements, products and/or content you viewed or searched for, download errors, length of visits to certain pages and page interaction, and in the case of our mobile Engagements, the other Engagements you have downloaded and how you use those Engagements. We collect Information automatically through the use of various technologies, including through cookies.

We acquire Information from other trusted sources (including, for example, business partners, advertising networks, and social media), and from other Jamesdaisy Pty Ltd entities and affiliates, to update or supplement the Information you provided or we collected automatically. This includes Information from your social media account when you grant us access to your social media account in connection with, for example, creating a Membership Account with us. Where permitted by law, we may combine this Information we receive from other sources, and with Information you give to us or that we collect about you. If you have created a Membership Account on one of our Engagements, you can contact us to receive a copy of the Personally Identifiable Information we collect from you via your Membership Account and correct, amend, or delete Personally Identifiable Information that is inaccurate. You may also close your Membership Account altogether.

It is your responsibility to ensure that you submit true, accurate and complete Information via your Membership Account and keep it up to date. You may also update your Personally Identifiable Information by contacting us through the contact details provided below. Please make sure to include

your name, username, and post code in your initial correspondence; this helps us protect the details and preferences on your Account from unauthorised access.

**3. How we use, share and disclose your Information**

We may use your Information for the purposes of enabling you to use our Engagements, enabling us to fulfil orders you make (such as for products, services or newsletters), to send you marketing materials, and provide personalised content and experiences.

We may also use the Information we collect to administer our Engagements for internal purposes, including troubleshooting purposes; optimise or improve our products, services, operations, and Engagements; as part of our effort to keep our Engagements safe and secure; to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; to communicate with you about your Account or transactions with us and send you information about features on our Engagements or changes to our policies; to provide you with advertising based on your activity on our Engagements and on third-party sites and Engagements; to make suggestions and recommendations to you and other users of our Engagements about goods or services that may interest you or them; and to detect, investigate and prevent activities that may violate our policies or be illegal.

**4. User choice, including how to opt in or opt out from direct marketing**

As noted above, we, and selected third parties with whom we share your Information, may use your Information for direct marketing purposes, including to provide updates, newsletters, events or other communications that we think may interest you. Where required by law, your prior consent will be obtained before we send direct marketing. In any event, we will offer you the option to unsubscribe from electronic marketing materials. If you do not wish us to share your Personally Identifiable Information with third parties for their marketing purposes, please contact us by way of the contact details provided below.

**5. Data Security and Retention**

We apply appropriate security measures aimed at protecting your Personally Identifiable Information that is under our control from unauthorised access, collection, use, disclosure, copying, modification or disposal. We will notify you in compliance with applicable law regarding any data breach. Where you have a password that enables you to access our Engagements, you are responsible for keeping this password secure and confidential. Please be advised that we may retain some personal information after you delete your Membership Account, for example if necessary to meet our legal obligations or for tax and accounting purposes.

**6. Use of Engagements by minors**

The features, programs, promotions and other aspects of our Engagements requiring the submission of Personally Identifiable Information are not intended for young children. We do not knowingly collect Personally Identifiable Information from children under the age of 16. If you are a parent or guardian of a child under the age of 16 and believe he or she has disclosed Personally Identifiable Information to us please contact us by way of the contact details below. A parent or guardian of a child under the age of 16 may review and request deletion of such child's Personally Identifiable Information as well as prohibit the use of that Information.

**7. Online Tracking – Cookies and other technologies**

We may use third party tools to make the advertising we show you on our Engagements and/or our partner websites more relevant and interesting to you. For this purpose, we use cookies, flash cookies, web beacons or similar technologies to collect Information about your browsing behaviour, and deliver interest-based ads to you. A cookie is a text file containing small amounts of information that a

website can send to your browser, which may then be stored on your computer as a tag that distinguishes your computer but does not name you. You can set your browser to notify you before you receive a cookie, giving you the chance to decide whether to accept it. You can also set your browser to turn off cookies; however, if you do this, some of the features of our Engagements may not work properly. You can also reject certain cookies served through Engagements by opting out on the website of the third party placing the cookie, which you can identify through your browser.

**8. Changes to the Policy**

This Policy was last updated in December 2018. A notice will be posted on our Engagements for 30 days whenever this Policy is changed in a material way. By continuing to use our Engagements you confirm your acceptance of the relevant changes.

**9. Complaints about privacy**

If you believe that we have breached the Australian Privacy Principles or this Policy, or you have any concerns about how your Information will be used, please contact us by way of the contact details provided below. We will respond to your complaint within 30 days. If our response does not satisfy you, you may apply to the Office of the Australian Information Commissioner.

**10. Overseas disclosure**

We do not anticipate that any Information is likely to be disclosed to overseas recipients in countries within which we do not operate.

**Questions about this Policy**

If you have a question or concern about this Policy or our handling of your Information, you can contact us by way of the contact details provided below.

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