
Privacy policy

AVADA Group Limited ACN 648 988 783

PRIVACY POLICY

Privacy Policy and Disclaimer

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Privacy Policy

AVADA Group Ltd and its related companies (referred to in this policy as **AVADA, Our Company, we, us or our**) are bound by the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**), which govern the way we manage your personal information. If you are in the European Economic Area you may have additional rights under the EU's General Data Protection Regulation (**GDPR**). For the purposes of the GDPR, AVADA is a data controller. This policy sets out how we collect, use, disclose and manage your personal information.

Personal information collected

We collect personal information (i.e. information that can identify you) where it is relevant to the services we provide to you. The information we collect depends on the services you are seeking, but will generally include your name, address, telephone number and email address. Other personal information we may collect includes your bank account details and credit-related personal information (including credit eligibility). We may also collect information regarding the interactions you have with us.

How we collect personal information

We may collect your information in a number of ways. Generally we will collect personal information directly from you through the use of any of our standard forms, over the internet, via email, or through a telephone conversation with you. However, sometimes we will collect personal information from third parties, such as credit reporting bodies and other

entities that provide services to us and which relate to the products and services provided by us to you, or from publicly available sources of information.

Purpose for which we collect information

Generally, we will collect, use and hold your personal information if it is reasonably necessary for or directly related to the performance of our functions and activities, and for the purposes of:

- providing products and services to you or someone else you know;
- providing you or someone else you know with a quote or offer for our products and services;
- communicating with you or someone else you know in relation to the provisioning of our products and services;
- providing you with information about other products and services that we, our related entities and other organisations that we have affiliations with, offer that may be of interest to you;
- facilitating our internal business operations, including the fulfilment of any legal requirements;
- analysing our products and services and our customer needs (including for the purpose of developing new or improved products or services).

You may choose not to provide your personal information, however this may affect our ability to provide the products or services to you.

Use and disclosure of personal information

Generally, we only use or disclose personal information about you for the purposes for which it was collected (as set out above), or as otherwise authorised by law. We may disclose your personal information to our related entities or third party service providers only if it is reasonable and necessary:

- for the operation of our business. For example, we may disclose your personal information to an IT services provider if we upgrade our systems; or
- to facilitate the provision of the products or services to you. For example, we may disclose your personal information to our suppliers or contractors who we engage to provide the products or services to you. These third parties may provide us with any personal information they have collected from you in the course of providing those products or services.

Our third party service providers may be located in Australia. These third parties manage your personal information under their own privacy policies. However, where we disclose your personal information to third parties, we will take reasonable steps to ensure that they treat your information as confidential.

The Privacy Act sets out certain safeguards which must be complied with before AVADA is allowed to transfer Personal Information outside of Australia. Where Personal Information is disclosed outside of Australia, all reasonable steps will be taken to ensure that the recipient will handle the Personal Information in a manner consistent with the Privacy Act. By agreeing to this Privacy Policy, you consent to the transfer of your Personal Information to a country outside of Australia.

We store information in different ways, including hardcopy and electronic form. We have safeguards in place and use best endeavours to ensure your personal information is

secure, including electronic security controls and confidentiality requirements for employees and contractors.

We will ensure that all officers, employees and subcontractors are aware of and understand our obligations as well as their own obligations in respect of privacy. We will achieve this through the provision of training and through maintaining and implementing internal policies and procedures to prevent personal information from being collected, used, disclosed, retained, accessed or disposed of improperly.

We may transfer your personal information to overseas countries, including but not limited to the USA and European Union countries, in order to perform one or more of our functions or activities. In these circumstances, we will take reasonable steps to ensure that the overseas recipient does not breach the APPs in relation to the information.

Cookies

Our websites utilise cookies, which is a small text file that is placed on your computer or mobile device when you visit our website. Cookies collect information about users and their visit to the website, such as their internet protocol (IP) address, how they arrived at the website (for example, through a search engine or a link from another website) and how they navigate within the website. A cookie cannot read data from your hard drive or read cookie files created by other websites.

We use cookies and other technologies to facilitate your internet sessions, offer you services according to preferred settings, track use of our websites and compile statistics about activities carried out on our website.

Electronic Communications and Marketing Activities

We would like to send you information about our products and services from time to time, as well as those of our subsidiary companies.

If you have agreed to receive marketing emails, you may always opt out at a later date. You have the right at any time to stop us from contacting you for marketing purposes or giving your data to our related parties.

You may at any time opt out of receiving such material by contacting us via email at contact@avadagroup.com.au or by using the unsubscribe link contained in any email material sent to you. Upon receiving such a request, we will remove your contact details from our distribution lists. We will process such requests as soon as reasonably practicable.

What are your data protection rights?

We would like to make sure you are fully aware of your data protection rights. Every user is entitled to the following:

The right to access – You have the right to request Our Company for copies of your personal data. We may charge you a small fee for this service.

The right to rectification – You have the right to request Our Company to correct any information you believe is inaccurate. You also have the right to request Our Company to complete information you believe is incomplete.

The right to erasure – You have the right to request that Our Company erase your personal data, under certain conditions.

The right to restrict processing – You have the right to request that Our Company restrict processing of your personal data, under certain conditions.

The right to object to processing – You have the right to object to Our Company's processing of your personal data, under certain conditions.

The right to data portability – You have the right to request that Our Company transfer the data that we have collected to another organisation, or directly to you, under certain conditions.

If you make a request we will respond to your request within one month. If you would like to exercise any of these rights, please contact us via email at contact@avadagroup.com.au

Internet Users

If you access and use our website we may collect additional information including your server or IP address, domain name and the pages accessed and documents downloaded by you.

Our website may contain links to external websites which are not subject to our privacy policy. We are not responsible for the privacy practices of linked websites.

Accessing your personal information and correction

You may request access to the personal information we hold about you by making a written request. We will respond to your request within a reasonable period. We may need to verify your identity before access to your personal information is granted and we may charge you a reasonable fee for compiling the information you request. You will not be charged a fee for making the request for access or for correcting any personal information about you.

If you believe that any personal information we hold about you is inaccurate, incomplete or out-of-date, please contact us and request that your personal information be corrected. We will consider your request and take steps to correct your personal information.

In some circumstances permitted by law we may decline your request for access to personal information, or to make a correction to the information held by us. We will provide you with reasons for refusing access and the mechanisms available to complain in line with our obligations under the Privacy Act.

Complaints

If you believe there has been a breach of the Privacy Act, the APPs or the GDPR (if applicable) please contact us. We will investigate your complaint and endeavour to resolve it as quickly as possible.

If you are not satisfied with our response, you may lodge a complaint with the Office of the Australian Information Commissioner.

Changes to Privacy Policy

We may change our Privacy Policy from time to time. Any updates to our Privacy Policy will be published on our website.

Contact us

To contact us about information privacy please contact our Privacy Officer:

Post: AVADA Group
Attention: Privacy Officer
PO Box 564
BRISBANE QLD, 4000

Email: contact@avadagroup.com.au