

MANDOE PTY LIMITED ACN 147 008 937: PRIVACY POLICY

1 INTRODUCTION

- 1.1 This privacy policy is the official online privacy policy of Mandoe Pty Limited (ABN 49 147 008 937) (**Mandoe, we, our, us**) and it applies to all Personal Information (as defined in the Privacy Act 1988 (Cth) (**Privacy Act**)) collected, stored, used and disseminated by Mandoe (**Privacy Policy**).
- 1.2 Our Privacy Policy governs all Personal Information relating to our key functions and activities concerning the development, implementation and operation of highly customisable digital advertising and marketing solutions and associated services.
- 1.3 In this Privacy Policy we explain how and why we collect your personal information, how we use it, and what controls you have over our use of it. We are bound by the Australian Privacy Principles contained in the Privacy Act in relation to the handling of Personal Information and we are committed to complying with Commonwealth legislation governing privacy of Personal Information by businesses and to protecting and safeguarding your privacy when you deal with us. We encourage all site users and customers to refer to the Office of the Australian Information Commissioner's website at www.oaic.gov.au which contains important information about privacy laws in Australia.

2 COLLECTION OF INFORMATION

- 2.1 Some information provided to us by clients, customers, contractors and other third parties (**Users**) might be considered private or personal. Depending on the particular circumstance, we may collect and hold a range of different information about you. This can include your name, date of birth, contact details (including address, email address, phone number or mobile telephone number), occupation, driver licence number, username or password, financial information and information about how you use our services and your page likes. This is not an exhaustive list. Without these details we would not be able to carry on our business and provide our services to you.
- 2.2 By providing Personal Information to us, you may provide us with two types of information: Personal Information that you knowingly and voluntarily choose to provide and Anonymous Information (as defined below) that we automatically collect as you browse.
- 2.3 Our web servers may automatically collect and store the name of the domain and host from which you access the internet and the internet protocol address of your computer. Additionally, we may collect information about the browser software you use; the type of operating system your computer uses; the date and time you access our services; the website you visited just prior to visiting our services; and the amount of time you spend on each website relating to our services (**Anonymous Information**). Anonymous Information may also include session cookies, your device IMEI number, IP address, MAC address and carrier information for any device that connects to the network. We use this Anonymous Information to improve the performance of our services and make it more compatible with the technology used by our Users. This Anonymous Information may be combined with Personal Information you have provided to us.
- 2.4 We will only collect such Personal Information if it is necessary for one of our functions or activities. We retain the right to use or disclose Personal Information

about you that is required in the provision of information about or the promotion or delivery of Mandoe and services to the User, such as newsletters, promotional materials or direct marketing campaigns relevant to the services that we offer. We may also disclose your Personal Information to a third party payment processing provider in connection with payment or billing for the provision of services to the User. In addition, we may also disclose your Personal Information to our respective clients in connection with their promotional activities and feedback channels.

- 2.5 The Privacy Act defines some types of Personal Information as sensitive. We do not commonly collect sensitive information, which includes, but is not limited to information about a person's race, ethnic origin, political opinions, health, religious or philosophical beliefs and criminal history. In the event we require any sensitive information, we would only collect this with your permission, and we will only use it for the purpose for which you provided it.
- 2.6 Personal Information about you may be collected by us from devices or browsers which you use to access our webpages or other webpages, where we keep a record and a copy of your contact with us, where you submit information through web forms, by logging your IP address, collecting GPS data, by use of cookies, by recording phone numbers and email addresses from which you contact us, by any smart phone, browser plugin or other application we use which might collect information from the device or browser used by you and in other ways which rely on technical access to information available from devices and operating systems that you might use.
- 2.7 We may also obtain your Personal Information from our affiliates or advertising partners, customers and other third parties that we consider helps us to deliver or advertise our services, understand online activity and collect information that we consider important to managing the quality or content of the services that we deliver.
- 2.8 We may store your information in hard copy or electronic format, in storage facilities that we own and operate ourselves, or that are owned and operated by our services providers. We take the privacy and security of your information seriously and we are committed to maintaining the security of your information under our control. We use a combination of technical solutions, security controls and internal processes to help us protect your information and our network from unauthorised access and disclosure. While we take these steps to maintain the security of your information, you should be aware of the range of information security risks that exist today and take appropriate care to help safeguard your information.

3 USE OF INFORMATION

- 3.1 By using Mandoe's services and website you consent to us using and disclosing your information both for the purposes for which we have collected it (including by providing your information to a third party payment processing provider in connection with payment or billing for the provision of services to you) and for other purposes related to marketing and advertising our services and the services of other entities with whom we have relationships, including entities that market and promote goods and services unrelated to those which we market and promote.
- 3.2 We may use your information for a range of different purposes, including:
 - a. to verify your identity and for fraud checking;

- b. to provide products and services to you, to provide you with information about those products and services to assist you with enquiries or purchases, to enhance your experience on our network, or to provide you with better customer service; and
 - c. to verify your identity for logon purposes (e.g. use of social media networking information) and to create a user account associated with a social profile. As part of this service, we will share the Personal Information with the respective client.
- 3.3 We may transfer Personal Information to related bodies corporate and unaffiliated service providers in locations beyond Australia (including, but limited to, the United States of America, Singapore and New Zealand) in the course of storing that Personal Information and when using or disclosing it for one of the purposes referred to above. When transferring Personal Information to foreign jurisdictions, we may take steps to ensure the overseas recipient of the Personal Information does not breach the Australian Privacy Principles in relation to that Personal Information. However, we may be unable to ensure the overseas recipient may not be subject to privacy obligations equivalent to those under the Privacy Act and could be compelled by foreign law to make disclosure of the information. By using our services, you consent to us making the disclosure to overseas recipients on that basis.

4 ACCESS OF INFORMATION

By using Mandoe's services and website you consent to us using and disclosing your information both for the purposes for which we have collected it (including by providing your information to a third party payment processing provider in connection with payment or billing for the provision of services to you) and for other purposes related to marketing and advertising our services and the services of other entities with whom we have relationships, including entities that market and promote goods and services unrelated to those which we market and promote.

5 HOW WE HOLD YOUR INFORMATION

We may store your information in hard copy or electronic format, in storage facilities that we own and operate ourselves, or that are owned and operated by our service providers. We take the privacy and security of your information seriously and we are committed to maintaining the security of your information under our control. We use a combination of technical solutions, security controls and internal processes to help us protect your information and our network from unauthorised access and disclosure.

6 WHY WE DISCLOSE YOUR INFORMATION?

We may disclose your information to third parties who provide services to us, including organisations and contractors that assist us with the purposes for which we use your information. These services include:

- a. customer/client enquiries;
- b. installation maintenance and repair services;
- c. market research, marketing and telemarketing.
- d. as required or authorised by law; and

- e. to third parties who assist us to manage or develop our business and corporate strategies and functions, including our corporate risk or funding functions.

7 LINKS

- 7.1 Our services may contain links to other web sites and those third party web sites may collect Personal Information about you. We are not responsible for the privacy practices of other businesses or the content of web sites that are linked to our services. Mandoe encourages users to be aware when they leave the site and to read the privacy statements of each and every web site that collects personally identifiable information.

8 SECURITY AND STORAGE

- 8.1 Mandoe places great importance on the security of all information associated with our customers and contractors. We have security measures in place to protect against the loss, misuse and alteration of Personal Information under our control.
- 8.2 Personal information is de-identified or destroyed securely when no longer required by us.
- 8.3 Mandoe retains the information you provide to us including possibly your contact and credit card details to enable us to verify transactions and customer details and to retain adequate records for legal and accounting purposes. This information is held on secure servers in controlled facilities.
- 8.4 Information stored within our computer systems can only be accessed by those entrusted with authority and computer network password sanctions.
- 8.5 No data transmission over the internet can be guaranteed to be 100 per cent secure. As a result, while we strive to protect user's Personal Information, Mandoe cannot ensure or warrant the security of any information transmitted to it or from its online products or services, and users do so at their own risk. Once Mandoe receives your transmission, it makes every effort to ensure its security on its systems.
- 8.6 Ultimately, you are solely responsible for keeping your passwords and/or account information secret. You should be careful and responsible whenever you are online.

9 ACCESS TO AND CORRECTION TO PERSONAL INFORMATION

- 9.1 Mandoe is committed to maintaining accurate, timely, relevant and appropriate information about our Users.
- 9.2 So long as your request for your Personal Information is in accordance with the Australian Privacy Principles, then we will give you access to that information.
- 9.3 Inaccurate information will be corrected upon receiving advice to this effect from you. To ensure confidentiality, details of your Personal Information will be passed on to you only if we are satisfied that the information relates to you.
- 9.4 If we refuse to provide you with access or correct the Personal Information held about you by us, then we will provide reasons for such refusal.

- 9.5 If you require to access your Personal Information, please contact us on privacy@mandoemedia.com or contact us through this form <http://www.mandoemedia.com/privacy>

10 COMPLAINTS

- 10.1 If you have a complaint about our Privacy Policy or the collection, use or safe disposal or destruction of your Personal Information, your complaint should be directed in the first instance to us, by calling us on privacy@mandoemedia.com or <http://www.mandoemedia.com/privacy>
- 10.2 We will investigate your complaint and attempt to resolve any breach that might have occurred in relation to the collection, use or destruction of Personal Information held by us about you in accordance with the Commonwealth Privacy legislation. If you are not satisfied with the outcome of this procedure then you may request that an independent person (usually the Commonwealth Privacy Officer) investigate your complaint.

11 CHANGES TO PRIVACY POLICY

- 11.1 If Mandoe changes its Privacy Policy, it will post changes on this Privacy Policy page so that users are always aware of what information is collected, how it is used and the way in which information may be disclosed. As a result, please remember to refer back to this Privacy Policy regularly to review any amendments.

12 CONTACTING US

- 12.1 If you require further information regarding our Privacy Policy, please contact us on privacy@mandoemedia.com or contact us through this form <http://www.mandoemedia.com/privacy> Should you wish to read more information on privacy legislation or the Australian Privacy Principles we recommend that you visit the Australian Information Commissioner's website at www.oaic.gov.au which contains important information about privacy laws in Australia.

13 ACCEPTANCE

- 13.1 You accept that your use of this site includes your acceptance of this Privacy Policy.

Last policy review date: 7 June 2016.