

 **Privacy** 

In this Privacy Policy, 'us' 'we' or 'our' means Ezidox Pty Ltd (ABN 44601979462) and our related bodies corporate, and "you" and "your" means anyone using the ezidox™ portals and apps. We are committed to respecting your privacy. Our Privacy Policy sets out how we collect, use, store and disclose your personal information and forms part of the Terms and Conditions of using ezidox™. Personal information includes information about an individual that is reasonably identifiable including, for example, your name, age, gender, contact details, financial, health and/or medical information.

We are obliged to act in accordance with all applicable laws and privacy legislation, including the Privacy Act 1988 (Cth) and subsequent amendments, which includes the Australian Privacy Principles and any current Australian Privacy Principle Code (collectively, 'Privacy Act'). The Australian Privacy Principles set out how we must handle your personal information during its collection, use and disclosure. This Privacy Policy is designed to comply with relevant privacy legislation and is specifically based on the Australian Privacy Principles and relevant guidance materials published by the Office of the Australian Information Commissioner (OAIC).

By providing personal information to us or visiting our websites or using the ezidox™ portals and apps, you consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy and any other arrangements that apply between us. We may change our Privacy Policy from time to time by publishing changes to it on our website. We encourage you to check our website periodically to ensure that you are aware of our current Privacy Policy.

1. What personal information do we collect?

Note: All references in this Privacy Policy to personal information include both personal and sensitive information as defined in the Privacy Act.

We may be able to provide some services to you without requiring you to identify yourself. For example, you may be able to send and receive certain documents or information without having to reveal any of your personal information. However, by their nature most of our products and services usually require you to disclose your personal information before we can provide you with that product or service.

We may collect the following types of personal information from you when you use any of our products or services:

- Name
- Mailing/street address
- email address
- telephone number(s)
- other contact details
- age/date of birth
- credit card information (via our payment platform)
- 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
- details of 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; and/or
- any other personal information that may be required in order to facilitate your dealings with us.

In addition to disclosing your personal information to enable us to provide our products and services to You, by its nature the ezidox™ portals and apps enable you to send and receive documents, information and related meta data (collectively, “Documents”) that may contain personal and sensitive data including:

- Financial records
- Health and medical information;
- Racial/ethnic origin
- Political opinions
- Membership of a political association, professional or trade association or trade union
- Religious beliefs or affiliations
- Philosophical beliefs
- Sexual orientation or practices
- Criminal records
- Biometric information that is to be used for certain purposes
- Biometric templates.

We provide a service to collect and store Documents containing personal and sensitive information with your consent, in limited situations which the law allows. We may collect and store these types of personal information either directly from you, or from external sources (see below). UNDER NO CIRCUMSTANCES DO WE ACCESS OR USE YOUR DOCUMENTS FOR ANY PURPOSE OTHER THAN TO PROVIDE A SERVICE FOR YOU TO SEND AND RECEIVE THEM.

If you disclose to us the personal information of any third party, you must first obtain their consent to your disclosure and to our processing of that third party's personal information in accordance with the terms of this Privacy Policy. This includes uploading Documents that contain personal information, in respect of which Documents we are only acting as a processor and will process and store such

Documents in accordance with your instructions. You will remain the controller of those Documents.

In addition, if you apply for a job or position with us we may collect certain information from you (including your name, contact details, working history and relevant records checks) from any recruitment consultant, your previous employers and others who may be able to provide information to us to assist in our decision on whether or not to make you an offer of employment or engage you under a contract. This Privacy Policy does not apply to acts and practices in relation to employee records of our current and former employees, which are exempt from the Privacy Act.

2. External sources of information

In some cases we might collect your personal information from external sources. Examples of the people or organisations that may provide us with information are: employers, parents or guardians in respect of children, persons authorised by you (such as family members, lawyers, and financial representatives), hospitals, medical practitioners and health services providers, public sources of information and social media and other virtual communities and networks where people create, share or exchange information.

3. Notification

We will take reasonable steps to inform you that we have collected your personal information, unless:

- it is not reasonable to do so;
- it is apparent from the circumstances that you are aware of the collection; and/or
- you would expect us to have the information.

4. Why do we collect, use and disclose personal information ?

We may collect, hold, use and disclose your personal information for the following purposes:

- to enable you to access and use our website, services, products and applications;
- to assist with your application for finance, insurance or other product or service you wish to apply for;

- to enable the administration of financial, insurance or other products and services which includes responding to your enquiries, requests for information and managing claims or complaints;
- to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties;
- to operate, protect, improve and optimise our website, services, products and applications, business and our users' experience, such as to perform analytics, conduct research and for advertising and marketing;
- to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- to send you marketing and promotional messages and other information that may be of interest to you, including information sent by, or on behalf of, our business partners that we think you may find interesting;
- to administer rewards, surveys, contests, or other promotional activities or events sponsored or managed by us or our business partners; and/or
- to consider your employment application.

We may also disclose your personal information, but not your Documents, to a trusted third party who also holds other information about you. This third party may combine that information in order to enable it and us to develop anonymised consumer insights so that we can better understand your preferences and interests, personalise your experience and enhance the products and services that you receive.

5. Do we use your personal information for direct marketing?

We and/or our carefully selected business partners may send you direct marketing communications and information about our services and products. This may take the form of emails, SMS, mail or other forms of communication, 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 (eg an unsubscribe link). In the event you opt out of receiving direct marketing communications, we may still communicate with you regarding an existing product or service of ours that you are using in order to provide the service you have requested, update you as to features, pricing or other relevant issues.

6. To whom do we disclose your personal information ?

We may disclose personal information for the purposes described in this Privacy Policy to:

- any entity, including government agencies, regulatory bodies and law enforcement agencies, as required, authorised or permitted by law or a court order;
- any person, entity or platform provider authorised by you or acting on your behalf including, without limitation, your financial institution, legal, financial or other adviser, hospital, medical practitioner, health services provider, accountant, trustee, administrator, employer, guardian, attorney, agent, or other professional services provider;

- payment systems operators (e.g. when you pay any of our fees by credit card)
- our existing or potential agents, partners (which specifically includes insurers authorised under the Life Insurance Act 1995);
- our employees and related bodies corporate;
- third party suppliers and service providers (including providers for the operation of our websites, apps and/or our business or in connection with providing our products and services to you)
- professional advisers, dealers and agents
- our sponsors or promoters of any competition that we conduct via our services; and/or
- anyone to whom our assets or businesses (or any part of them) are transferred.

7. Disclosure of personal information outside Australia

Unless otherwise made clear, all your Documents and personal information are stored and managed on servers located in Australia. We will not, without your express consent, disclose your personal information outside of Australia to third party suppliers, cloud storage and service providers located in other countries. In the event that you provide your consent to the disclosure of your information outside of Australia we will take reasonable steps to ensure that any overseas recipient will deal with such personal information in a way that is consistent with the Australian Privacy Principles, but you hereby acknowledge and agree that we may not be able to ensure that overseas recipients handle that personal information in compliance with Australian Privacy Law.

8. Using our website and cookies

We may collect personal information about you when you use and access our websites, portals and apps. 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. For example, where a cookie is linked to your account, it will be considered personal information under the Privacy Act. 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.

9. 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.

However, we cannot guarantee the security of your personal information. We have processes in place to identify, manage and remediate privacy and data breaches in accordance with our obligations under applicable law, including the notifiable data breach regulations. We educate our staff about our obligations to protect your personal information and impose contractual obligations of confidentiality and strict controls over their access to any personal data. We will co-operate with our customers, agents, and partners to promptly notify them of any privacy and data breaches in cases where there is a likelihood of a real risk of serious harm given the circumstances of the breach. We do not have the ability to access and use your Documents, which are encrypted before being stored as part of the service we provide to you, for any purpose whatsoever without your express consent.

10. Links

Our websites, portals and apps may contain links to other websites or services operated by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites or services, and have no control over or rights in those linked websites or services. The privacy policies that apply to those other websites or services may differ substantially from our Privacy Policy, so we encourage individuals to read them before using those websites or services.

11. Accessing or correcting your personal information

You can access the personal information we hold about you by contacting us using Contact Us or similar function. Your access to your personal information is subject to some exceptions permitted by applicable law, including any situation in which we reasonably believe that:

- payment systems operators (e.g. when you pay any of our fees by credit card)
- our existing or potential agents, partners (which specifically includes insurers authorised under the Life Insurance Act 1995);
- our employees and related bodies corporate;
- third party suppliers and service providers (including providers for the operation of our websites, apps and/or our business or in connection with providing our products and services to you)
- professional advisers, dealers and agents
- our sponsors or promoters of any competition that we conduct via our services; and/or
- anyone to whom our assets or businesses (or any part of them) are transferred.

If we refuse to provide you with access to your personal information we will, if reasonable to do so, provide you with a written explanation outlining the reasons for our refusal. The explanation will also outline the steps available to you to complain about our refusal. 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.

12. 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 support@ezidox.com or via the Contact Us function on our website at www.ezidox.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, we will provide you with information about the further steps you can take.

In the event that we are unable to resolve your complaint to your satisfaction, we will inform you as to how you can escalate the complaint to the appropriate external dispute resolution body. In cases of privacy related complaints, this is generally the Office of the Australian Information Commissioner (OAIC). There is specific information about the OAIC complaints and investigation process on the OAIC website at <http://www.oaic.gov.au/> and contact details are:

Office of the Australian Information Commissioner GPO Box 5218 Sydney NSW Phone: 1300 363 992 Email: enquiries@oaic.gov.au

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 using the details set out below:

EFFECTIVE: 6 February, 2019

Privacy Manager

Ezidox Pty Ltd

Level 2, 6 The Corso

Manly NSW 2095

Telephone: 1 300 656 705

Email: support@ezidox.com