

PRIVACY POLICY

This policy sets out the basis on which iGenius Group of Level 3, 162 Collins Street, Melbourne VIC 3000 (ABN 58137137001) (together with our holding company, collectively called "iGenius" or "**we**") collects personal information from you and how we process such data.

We are committed to collecting and holding Personal Information in accordance with the requirements of the Australian Privacy Principles ("**APPs**") under the Privacy Act 1988 (Cth) (the "**Privacy Act**").

By visiting our website <https://www.igeniusgroup.com/> (our "**Site**") you accept and consent to the practices set out below.

1 **Collection of information**

1.1 For the purposes outlined in Clause 2, we may collect and process the following information about you:

(a) *Information you give us* - information that you provide us (which may include your name, address, email address, telephone number, credit card information and other personal description) by filling in forms on our Site, or by corresponding with us (by phone, email or otherwise), for example:

- (i) when you report any problem to us;
- (ii) when you use certain features on our Site;
- (iii) request any support from us; or
- (iv) complete any survey or questionnaire we send you.

(b) *Information we collect about you* - information automatically collected when you visit our Site, for example:

- (i) technical information including the Internet protocol (IP) address used to connect your computer to the Internet, your log-in information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- (ii) information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number; and

(c) *Information we receive from third parties* - We work with third parties and we may receive information about you from them, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks,

analytics providers, search information providers, credit reference agencies. We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

- 1.2 We only retain personal information for so long as it is necessary. Personal information may be archived as long as the purpose for which the personal information was used still exists or we are otherwise required by law to retain the personal information.

2 Uses made of the information

- 2.1 We use information held about you for the following purposes:

- (a) providing, improving and developing our services;
- (b) researching, designing and launching new features or products;
- (c) presenting content and information in our Site in the most effective manner for you and for the device you use;
- (d) providing you with alerts, updates, materials or information about our services or other types of information that you requested or signed up to;
- (e) complying with laws and regulations applicable to us in or outside Australia;
- (f) responding or taking part in legal proceedings, including seeking professional advice;
- (g) for direct marketing purposes (please see further details in Clause 2.2 below);
- (h) communicating with you and responding to your questions or requests; and
- (i) purposes directly related or incidental to the above.

- 2.2 We intend to use your personal information in direct marketing (i.e. offering or advertising products or services by sending the relevant information directly to you). We require your consent specifically for this purpose and you may opt out any time by contacting us by using the contact details provided below in Clause 10. For the purpose of this Clause:

- (a) the personal information that may be used in direct marketing are those that you provide to us or we collect from you under Clause 1.1 above;
- (b) the type of services or products that may be offered or advertised will be Updates on current products, special offers or discounts, new products or services, company updates;
- (c) the relevant information may be sent to you by Email;
- (d) you may opt out any time by Unsubscribing or sending us an email.

3 Disclosure of your information

We may disclose your personal information for the purposes described in this privacy policy to:

- (a) any member of our corporate group, which means our subsidiaries, our ultimate holding company and its subsidiaries;
- (b) personnel, agents, advisers, auditors, contractors, financial institutions, and service providers in connection with our operations or services (for example staff engaged in the provision of support services);
- (c) our overseas offices, affiliates, business partners and counterparts (on a need-to-know basis only);
- (d) persons under a duty of confidentiality to us;
- (e) persons to whom we are required to make disclosure under applicable laws and regulations in or outside Australia; or
- (f) actual or proposed acquirers of, or investors in, our business (or a substantial part thereof) in or outside Australia.

4 Cookies

- 4.1 Our Site uses cookies to distinguish you from other users of the Site. This helps us to provide you with a good experience when you browse our Site and also allows us to improve our Site.
- 4.2 A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree to the use of cookies. Cookies contain information that is transferred to your computer's hard drive.
- 4.3 We use persistent cookies and session cookies. A persistent cookie stays in your browser and will be read by us when you return to our Site or a partner site that uses our services. Session cookies only last for as long as the session (usually the current visit to a website or a browser session). 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.
- 4.4 We use the following cookies:
 - (a) Strictly necessary cookies – These are cookies that are required for the operation of our Site. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
 - (b) Analytical/performance cookies – They allow us to recognise and count the number of visitors and to see how visitors move around our Site when they are using it. This

helps us to improve the way our Site works, for example, by ensuring that users are finding what they are looking for easily.

- (c) **Functionality cookies** – These are used to recognise you when you return to our Site. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- (d) **Targeting cookies** – These cookies record your visit to our Site, the pages you have visited and the links you have followed. We will use this information to make our Site and the information displayed on it more relevant to your interests.

4.5 You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you do so, you may not be able to access all or parts of our Site.

4.6 We may use third-party web services on our Site. The service providers that administer these services use technologies such as cookies (which are likely to be analytical/performance cookies or targeting cookies), web server logs and web beacons to help us analyse how visitors use our Site and make the information displayed on it more relevant to your interests. The information collected through these means (including IP addresses) is disclosed to these service providers. These analytics services may use the data collected to contextualise and personalise the marketing materials of their own advertising network.

5 **Third party sites**

Our Site or our communication with you may from time to time contain links to third party websites over which we have no control. If you follow a link to any of these websites, please note that they have their own practices and policies. We encourage you to read the privacy policies or statements of these websites to understand your rights. We accept no responsibility or liability for any practices of third party websites.

6 **Security**

6.1 All information you provide to us is stored on our secure servers.

6.2 We restrict access to personal information to our employees, service providers and contractors on a strictly need-to-know basis and ensure that those persons are subject to contractual confidentiality obligations.

6.3 We review our information collection, storage and processing practices from time to time to guard against unauthorised access, processing or use.

6.4 Please note however, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted to our Site; any transmission is at your own risk.

7 **Your rights**

7.1 You have the right to:

- (a) check whether we hold personal information about you;
- (b) access any personal information we hold about you; and
- (c) require us to correct any inaccuracy or error in any personal information we hold about you.

7.2 You can request access to, and the correction of, your personal information by contacting us using the contact details provided below in Clause 10. Please include your name, email address and/or telephone number and describe your request.

7.3 The provision of access to personal information under Clause 7.1(b) may be subject to an administrative fee to meet our cost in processing your request.

8 **Changes to our Privacy Policy**

We may amend this policy from time to time by posting the updated policy on our Site. We encourage you to check our Site periodically to ensure that you are aware of our current privacy policy. By continuing to use our Site after the changes come into effect means that you agree to be bound by the revised policy.

9 **Making a complaint**

If you think we have breached the Privacy Act or the Australian Privacy Principles, or you wish to make a complaint about the way we have handled your personal information, you can contact us using the contact details provided below in Clause 10. Please include your name, email address and/or telephone number and describe your complaint. We will acknowledge receipt of 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.

10 **Contact us**

If you have any questions, comments or requests regarding personal information, please address to:

Director of Operations, Level 3, 162 Collins Street, Melbourne VIC
3000, 1300443648, admin@igeniusgroup.com

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