

PRIVACY POLICY

This Privacy Policy is administered by The Competition Company Pty Ltd (ABN 67 088 546 043) trading as Compco Digital.

You may contact us with any queries you may have in respect of this policy or your personal information by contacting via email: info@compcodigital.com

This privacy policy is available free of charge at www.compcodigital.com and if you require a copy of this policy in a different form from the online version then you can request this via email info@compcodigital.com

1. General policy

This policy sets out how Compco collects personal information. Compco respects the privacy of individuals. This policy governs the collection, use and disclosure of personal information.

Compco also provides its services to clients such as, Shopping Centres and Retailers. In turn providing access to your personal information as part of its services.

There are a number of ways that you can access and use the services provided by Compco, which include (but are not limited to):-

- a) online loyalty and rewards programs with participating brand and promotional partners;
- b) marketing consultancy services;
- c) digital platform development
- b) online competitions;
- c) customer relationship marketing tools;
- d) development of different user interfaces like Apps and third party login platforms such as Facebook Connect.

The services listed above and other activities detailed generally on Compco's website from time to time (available at www.compcodigital.com) are, altogether, Compco's Functions and Activities.

When you share information with Compco, for example, by creating a rewards program account or entering an online competition, we can make these Functions and Activities even better. This also allows third parties and brands who are also involved in our Functions and Activities to improve their products.

2. Collection of solicited personal information

Compco collects personal information where it is reasonably necessary for its Functions and Activities.

Where Compco requests personal information in relation to its Functions and Activities, Compco will state the general purposes for its use and to whom it may be disclosed, and the main consequences, if any, if the information is not provided.

Further, Compco will not solicit personal information about an individual from someone other than the individual, unless it has obtained consent to do so, or it is unreasonable or impractical in the circumstances for Compco to obtain this consent.

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3. Collection of unsolicited personal information

If Compco receives an individual's personal information in circumstances where this information has not been requested, then Compco will, as soon as reasonably practical, determine whether or not such personal information is relevant to its Functions and Activities.

If Compco would not ordinarily have collected this information, then it will be destroyed, if it is lawful and reasonable to do so.

If Compco retains unsolicited personal information, because it is necessary and related to its Functions and Activities, then it will inform an individual of the fact that it has collected this information and the circumstances of this collection, and the terms of this Privacy Policy will then be applicable to that personal information.

4. Notification of the collection of personal information

At the time that Compco collects an individual's personal information, or as soon as reasonably practical, Compco will notify an individual that this information has been collected, and the circumstances of that collection.

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5. Use of personal information

Compco uses the personal information that it collects to fulfil its Functions and Activities and to keep its users informed of Compco's business, and the products and services that it provides.

Compco tries to ensure, that as far as is practicable, this information is accurate, up to date, and complete.

Compco may use personal information from time to time to send marketing material that Compco considers will be useful. If Compco is notified that a person does not wish to receive such information, it will not send it to that person. This does not apply to information that Compco is legally required to send.

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6. Disclosure of personal information

Generally, Compco will obtain consent before it discloses any personal information. Consent may be given expressly or it may be implied by conduct. Depending on the product or service, personal information may be disclosed to:-

- a) external service providers such as retailers and shopping centres and other Australian and overseas related companies and promotional partners who participate in Compco's Functions and Activities;
- b) In particular, Compco's database of users is maintained on a server operated by a third party, under contractual obligations of confidence;
- c) social media companies such as Facebook, and other public forums in which you choose to participate and through which you access Compco's services; and
- d) any other person authorised, implicitly or expressly, when the personal information is provided to or collected by Compco.

Compco may disclose personal information to overseas recipients, this is likely where Compco's related parties and promotional partners have overseas subsidiaries or an individual uses a third party platform such as Facebook connect to use Compco's services, and the servers for that platform are not located in Australia.

7. Transborder data flows

Generally, Compco will not disclose personal information to an overseas entity without having obtained an individual's consent. In obtaining this consent Compco will ensure that users are made aware that the Australian privacy law or a law providing for similar privacy protections may not apply to an overseas entity's use of such personal information.

8. Security of personal information

Compco takes all reasonable steps to protect personal information it holds from loss, unauthorised access, modification, disclosure, interference or other misuse. Compco will take reasonable steps to destroy or permanently de-identify personal

information it holds if it is no longer needed for Compco's Functions and Activities.

9. Sensitive personal information

Compco does not generally collect any sensitive information as that term is used in the privacy legislation (including information relating to racial or ethnic origin, membership of political bodies, religion or trade unions, sexual preferences or activities, criminal record, state of health or medical history). Compco will only collect sensitive information where required by law or with consent and that information is reasonably necessary for, or related to one of its Functions or Activities. If Compco holds any sensitive personal information, that information will only be used and disclosed by Compco for the purpose for which it was provided. If Compco asks for sensitive information, Compco will explain this.

10. Access to personal information

A person may request access to personal information that Compco holds about them from the Program Administrator. Compco will process such requests within a reasonable time and in the manner, if any, requested. If Compco denies an access request, it will provide reasons for doing so.

11. Correction of personal information

Compco will take reasonable steps to ensure the personal information it holds is accurate, complete and up to date. Compco should be promptly notified if there are any changes to an individual's personal information. A person may ask Compco at any time to correct personal information held by it about them. On request, or if Compco becomes aware that personal information which it holds is inaccurate, out-of-date, incomplete or irrelevant or misleading, Compco will take reasonable steps to correct the information so that it is accurate, complete and up to date, and will also notify any third parties, to which this information has been disclosed, of these corrections. If Compco does not make changes in response to a request, it will provide reasons for not doing so.

12. Changes to this policy

Compco may amend this policy from time to time, and the policy will be published on Compco website.