

# Kingfisher Mobile Australia Pty Ltd - Privacy Policy

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## 1. Our commitment to your privacy

Kingfisher Mobile Australia Pty Ltd (ACN 630 439 842) (referred to as "**Kingfisher**", "**we**", "**our**" or "**us**") and our related entities recognise and respect your right to privacy and want you to understand how we collect, use and share personal information about you.

The Privacy Act 1988 (Cth) (**'Privacy Act'**), the Australian Privacy Principles, Privacy Regulation 2013 (**'Regulations'**) and registered privacy codes govern the way in which we must manage your personal information (**'Privacy Laws'**).

This Privacy Policy covers our data collection practices and describes your rights to access, correct, or restrict our use of your personal information as defined in the Privacy Act ("**data**").

This Privacy Policy applies when you visit or use our website or when we provide our services to you (the "**Services**"). We are committed to safeguarding the privacy of our website visitors and service users.

**By using the Services, you agree and are bound to the terms of this Privacy Policy.** You shouldn't use the Services if you don't agree with this Privacy Policy or any other agreement that governs your use of the Services.

We may use cookies on our website.

## 2. What is personal information?

"**Personal Information**" includes any information or opinion, about an identified individual or an individual who can be reasonably identified from that information. The information or opinion will still be personal information whether it is true or not and regardless of whether we have kept a record of it.

## 3. What types of Personal Information do we collect?

Personal Information that we collect may include (but is not limited to) the following:

- a. Name and title
- b. current postal address
- c. contact details including mobile telephone number and email address
- d. Service account number
- e. Device details in relation to the device being transacted
- f. Service or return address location details

You can choose not to provide your personal information to us, but generally the information we request from you is required in order for us to provide you with the Services we offer.

#### **4. Sensitive information**

Sensitive information is personal information that includes information relating to your racial or ethnic origin, criminal history, sexual orientation, membership of any trade or professional associations.

We generally do not collect '*sensitive information*' as defined under the Privacy Laws and we further restrict collection of such sensitive information to circumstances where we have either obtained your express consent or a permitted general situation exists.

#### **5. How and when do we collect your Personal Information?**

We collect your Personal Information to allow us to conduct our business functions, to provide our Services and for the specified purposes set out in paragraph 6. In some circumstances the collection of Personal Information may be required by law.

We may also collect Personal Information about you from our partners, related entities, companies and businesses of Kingfisher, who use our services. We will only collect your Personal Information in this way if it is unreasonable or impracticable to collect this information directly from you or if we are otherwise permitted to do so.

Kingfisher Mobile Australia and its partners / agents may obtain and collect certain information about consumers that is related with the services offered / rendered through Kingfisher Mobile Australia's programs. These interactions taken when visiting or transacting within Kingfisher Mobile Australia' websites and applications may be recorded to understand how consumers utilise all associated applications and websites which allows Kingfisher Mobile Australia to improve the performance, interaction or overall service of current programs and services offered to its customers and partners.

Where we engage with you multiple times over a short period in relation to the same matter, we may not provide you with a separate notice about privacy each time we engage with you.

In most cases, if you choose not to provide your Personal Information to us for the purposes set out in this Privacy Policy, we may not be able to provide you with requested information, products or services, or to effectively conduct our relationship with you.

##### **5.1 General ways in which we use your Personal Information:**

We may collect, hold and use your personal information:

- a. to identify you as an eligible customer
- b. to enable us to provide you with requested information, products or services

- c. to otherwise assist related entities by providing them with information and support including verifying your identity
- d. to help us to manage and enhance services we provide to you
- e. to manage and administer any account you may hold with us
- f. to conduct research for the purposes of improving existing products or services or creating new products or services
- g. to help us manage our business operations
- h. to respond to any queries or complaints you may have, or
- i. to comply with our statutory and legal obligations.

You consent to us using your Personal Information in the above ways and as set out in this Privacy Policy.

We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services.

In addition to the specific purposes for which we may process your personal information set out in this paragraph 5, we may also process any of your personal information where such processing is necessary for the performance of our contracts and compliance with our contractual arrangements, any legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **6. Providing your personal information to others**

Depending on the circumstances and the nature of your engagement with us, we may disclose your Personal Information to our related entities or to third parties that provide products and services to us or through us.

Employees and contractors may access your personal information in order to perform their duties and obligations and Kingfisher Mobile Australia will take all reasonable steps to ensure that those employees and contractors handle your Personal Information in a manner that is consistent with this Privacy Policy.

Kingfisher Mobile Australia may outsource certain function(s) and services relating to various aspects of the activities offered to support its programs. Kingfisher Mobile Australia will not disclose any personal identifiable information for marketing purposes, but may be required to provide personal identifiable information to its service providers who undertake aspects of the services rendered to complete partial or all transactions under the program offering.

We may also disclose your Personal Information to our Website host or software application providers in certain limited circumstances, for example when our Website experiences a technical problem or to ensure that it operates in an effective and secure manner.

In addition to the specific disclosures of personal information set out in this Section 6, we may disclose your personal information where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal information where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

## **7. How is your Personal Information retained and protected?**

The security of your personal information is important to us. We will take appropriate technical and organisational precautions to secure your personal information and to prevent the loss, misuse, unauthorized access, disclosure or alteration of your personal information.

Any Personal Information that is collected via our Website or which is held on our computer systems is protected by safeguards including physical, technical encryption and procedural methods.

Kingfisher Mobile Australia reserves the right to make changes to this Privacy Policy at any time whereby all changes will take effect immediately upon publication.

Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. We will retain your personal information for as long as legally required.

## **8. How can you access and update your Personal Information?**

We take all reasonable steps to ensure that any Personal Information we collect and use is accurate, complete and up-to-date. To assist us in this, you need to provide true, accurate, current and complete information about yourself as requested, and properly update the information provided to us to keep it true, accurate, current and complete.

Please contact us in any of the ways specified in paragraph 9 if you believe that the Personal Information is inaccurate, incomplete or out of date, and we will use all reasonable efforts to correct the information.

## **9. What to do if you have a complaint, question, problem or want to contact us about our use of your Personal Information or this Privacy Policy?**

If you:

- a. have a query or concern about this Privacy Policy or our Personal Information handling processes
- b. wish to make a complaint in relation to a breach of your privacy
- c. would like to access your Personal Information held by us

d. would like to update or correct your Personal Information held by us, or please contact our team by sending an email to [Privacy@kfglobal.com](mailto:Privacy@kfglobal.com).

## **10. How do we deal with complaints about policy?**

Please contact us as soon as possible in any of the ways specified in paragraph 9 if you feel that we have not respected your privacy or that we have conducted ourselves inconsistently with this Privacy Policy. We will investigate your queries and privacy complaints within a reasonable period of time depending on the complexity of the complaint.

Under the Privacy Laws you may also complain to the *Office of the Australian Information Commissioner (OAIC)* about the way we handle your personal information. Please note the OAIC requires any complaint must first be made to the respondent organisation. The law also allows 30 days for the respondent organisation to deal with the complaint before a person may make a complaint to the OAIC.

The Commissioner can be contacted at:  
Office of the Australian Information Commissioner  
GPO Box 5218  
Sydney NSW 2001  
Phone: 1300 363 992  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)  
Website: [www.oaic.gov.au](http://www.oaic.gov.au)

## **11. About cookies**

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## **12. Cookies that we use**

We may use cookies for the following purposes:

- *authentication* – we may use cookies to identify you when you visit our website and as you navigate our website;
- *status* – we use cookies to help us to determine if you are logged into our website;
- *personalisation* – we use cookies to store information about your preferences and to personalise our website for you;

- *security* – we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally;
- *analysis* – we use cookies to help us to analyse the use and performance of our website and services.

### **13. Updates to this Privacy Policy**

We may, from time to time, review and update this Privacy Policy, including to take into account new laws, regulations, practices and technology. All Personal Information held by us will be governed by our most recent Privacy