

PETSPOTAU PTY LTD (ABN 48 626 777 204)

Privacy Policy

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Date adopted	09/02/2021
Relevant Law	<i>Privacy Act 1988</i> (Cth) (Privacy Act)

PETSPOTAU PTY LTD Privacy Policy

This is the privacy policy for PETSPOTAU Pty Ltd (ABN 48 626 777 204) (**PETspot**). PETspot respects your right to privacy and is committed to safeguarding the privacy of our customers and website visitors.

The purpose of this Privacy Policy is to tell you what kinds of personal information we may gather or hold about you, how we may use that information, whether we disclose it to anyone, the choices you have regarding our use of that information, your ability to access or correct that information and how you may complain should you believe we have breached our privacy obligations.

Please read this Privacy Policy carefully. Please contact us if you have any questions – our contact details are at the end of this Privacy Policy.

You providing us with personal information indicates that you have had sufficient opportunity to access this Privacy Policy and that you have read and accepted it. If you do not wish to provide personal information to us, then you do not have to do so. However, it may affect our ability to provide services to you.

1. Collection of personal information

PETspot will, from time to time, receive and store personal information you enter onto our website, provided to us directly or given to us in other forms.

What is personal information?

“Personal information” is information or an opinion, whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

What kinds of personal information do we collect and hold?

The personal information we may collect and hold varies and is dependent on the nature of our dealings with you.

We collect information you share with us when you use the PETspot website or app, including but not limited to those set out below.

2.

- (a) **Account information:** when you sign up for an account, we require certain information such as your name and email address
- (b) **Profile information:** to use certain features, we may ask you to create a profile, which may include your address, phone number and other personal information
- (c) **Authentication information:** to ensure we can verify our breeders and buyers, we may collect your driver's licence and expiry date or other authentication information
- (d) **Transaction information:** we may collect information about your transactions such as payment information, including bank account details and credit card details
- (e) **Marketing information:** we collect information about your use of our products or services and preferences and opinions that you provide us
- (f) **Contact information:** you may choose to import your address book contacts' information to access certain features, such as inviting your contacts to use PETspot
- (g) **Communications:** we collect information about your communications with us and other users of the PETspot platform to be analysed for purposes such as fraud prevention, regulatory compliance, research and product development
- (h) **Log Data and Device Information:** when accessing the PETspot platform we automatically collect log information such as IP addresses, access times, and device information, even if you have not created a user account, and
- (i) **Other information:** you may otherwise choose to provide us information when you complete an application, conduct a search, update information on your profile, post to community forums, or use other features of PETspot.

We and our service providers may automatically collect information about you, including but not limited to those set out below.

- (a) **Website usage:** information about your use of our website such as browser type, operating system and the website visited immediately before coming to our site. This information is used in an aggregated manner to analyse how people use our site, so that we can improve our service
- (j) **Location information:** when you use certain features of PETspot, we may collect information about your general location (e.g. address, postcode) or more specific location information (e.g. GPS location). Most mobile devices allow you to control or disable the use of location services for applications, and
- (k) **Cookies:** we may from time to time use cookies on our website. Cookies are very small files which a website uses to identify you when you come back to the site and to store details about your use of the site. Cookies are not malicious programs that access or damage your computer. Most web browsers automatically accept cookies but you can choose to reject cookies by changing your browser settings. However, this may prevent you from taking full advantage of our website.

We may collect information that others provide about you when they use the PETspot website or app or obtain information from third parties, including but not limited to those set out below.

- (a) **Third party services:** if you connect your account with a third party service, the third party service provider may send us information such as your registration and profile information
- (b) **Reviews:** if someone has written a review about you, it may be published on your public profile
- (c) **Background information:** to the extent permitted by law, we may obtain public reports of criminal convictions or animal abuse registrations, and
- (d) **Other sources:** to the extent permitted by law, we may collect additional information about you from third party service providers and combine it with information we have about you.

We may maintain social media pages such as Facebook, LinkedIn, Twitter and Instagram. When you visit or interact with our pages, the platform provider's privacy policy will apply. If you or the platform provide us with information through the platform, we will treat such information in accordance with this Privacy Policy.

In most cases, if we do not collect the information we require, then we may be unable to undertake certain activities, such as providing you with our services.

How do we collect your personal information?

Generally, when providing services to our customers, we collect personal information directly from the individuals where reasonable and practical.

PETspot collects personal information from you in a variety of ways, including when you interact with us, when you access our website or app and when we provide our services to you.

We may receive personal information from third parties, publicly available sources of information and our related companies. If we do, we will protect it as set out in this Privacy Policy. We will only collect your personal information from third parties if it is unreasonable or impractical to collect the necessary information directly from you or if we are otherwise permitted to do so.

2. Use of personal information

PETspot may use personal information collected from you to provide you with information, updates and our services. We may also make you aware of new and additional products, services and opportunities available to you. We may use your personal information to improve our products and services and better understand your needs.

We collect, hold and use personal information about you:

- (a) to develop and improve the PETspot service
- (b) to enable you to access and use our website and app
- (c) to enable you to publish public information such as a profile page, listings and reviews
- (d) to enable you to communicate with other PETspot members

4.

- (e) to verify or authenticate identity or other information
- (f) for internal record-keeping
- (g) to monitor usage of our systems and services, to enable us to better understand how our services and resources are being used and to plan our future resource needs
- (h) to analyse customer needs, develop customer strategies and improve customer experiences
- (i) for market research, business development and industry analysis, including website and app development
- (j) for marketing, including direct marketing
- (k) to display extracts from the PETspot platform on other websites using widget and API technologies
- (l) to protect you and us from fraud
- (m) to comply with the our legal obligations, and
- (n) to respond to any queries or complaints you may have.

The PETspot platform allows you to publish information invisible to the general public. Information that is visible to the public includes your name, photographs, listings and reviews.

PETspot may contact you by a variety of measures including, but not limited to telephone, email, SMS or mail.

You can opt out of marketing related emails by following the unsubscribe instructions at the bottom of the email, or by contacting us at support@thepetspot.com.au. However, you may continue to receive non-marketing emails from us relating to our services.

3. Disclosure of personal information

We may disclose your personal information insofar as reasonably necessary for the purposes set out in this Privacy Policy. Personal information is only supplied to a third party when it is required for the delivery of our services.

We may disclose your personal information to:

- (a) other companies related to us
- (b) other members of PETspot as follows:
 - when a buyer submits an inquiry with respect to a listing, certain information is shared with the breeder including the buyer's name, application and any other information provided, and
 - certain information that a breeder consents to disclose to a buyer to facilitate transactions such as the breeder's name, phone number and email address
- (c) external service providers who assist us in providing products and services to customers

- (d) professional service providers and advisors who perform functions on our behalf, such as lawyers
- (e) government, regulatory authorities and other organisations as required or authorised by law, and
- (f) financial institutions for payment processing.

Organisations providing professional services to us are required to keep those dealings and personal information provided by us as confidential unless required to disclose such information by statute or law.

In the case of contracted service providers, we may disclose personal information from time to time to any of our contracted service providers and those contracted service providers may in turn provide us with personal information collected from you in the course of providing the relevant products or services.

By providing us with personal information, you consent to the terms of this Privacy Policy and the types of disclosure covered by this Policy. Where we disclose your personal information to third parties, we will request that the third party follow this Policy regarding handling your personal information.

4. Sensitive information

The Privacy Act describes 'sensitive information' as information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual orientation, criminal record, and health information about an individual.

We may collect sensitive information about you in the course of providing services to you. We will only collect this information with your consent and only if it is reasonably necessary in order to provide services to you.

We will only disclose your sensitive information to third parties if it is directly related to providing services to you.

5. Holding your personal information

Information that we collect will not be stored, processed in or transferred between parties located in countries outside of Australia.

If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our user databases, together with any personal information and non-personal information contained in those databases. This information may be disclosed to a potential purchaser under an agreement to maintain confidentiality. We would seek to only disclose information in good faith and where required by any of the above circumstances.

6. Overseas disclosure

We may disclose your personal information to our third party service providers for them to help us provide services to you. Our third party service providers will not store or access your personal information overseas.

7. Retaining personal information

We will take reasonable steps to destroy or permanently de-identify personal information that is no longer needed for any purpose that is permitted by the Privacy Act.

8. Account cancellation & Your Choices

To cancel your account with us, you may do so through our website or app, or alternatively send an email to us at support@thepetspot.com.au. Information you have shared with others may continue to be publicly available on the PETspot website or app after your account is cancelled.

You may at any time amend or delete information you provide on your user account by accessing your profile and reviewing your settings, listings and personal information.

If you do not wish to receive marketing-related materials you can opt-out by following the unsubscribe instructions contained in the communication, or alternatively contact us directly at support@thepetspot.com.au.

9. Use of government related identifiers

We will not use government related identifiers (such as driver's licence numbers) as our own identifier of individuals. We will only use or disclose such identifiers in the circumstances permitted by the Privacy Act.

10. Security of your personal information

PETspot is committed to ensuring that the information you provide to us is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

The transmission and exchange of information is carried out at your own risk. We cannot guarantee the security of any information that you transmit to us, or receive from us. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that personal information that we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

Our servers have SSL certificates, so all data transferred between you and us is encrypted.

We encourage you to process payments through PETspot to ensure the security of your money and personal information such as your bank account and card details. Our payment processor Stripe requires the most stringent compliance with security standards. We also utilise encryption software and web browsers such as HTTPS to ensure the security of your communications.

11. Access to your personal information

You may request details of personal information that we hold about you in accordance with the provisions of the Privacy Act. A small administrative fee may be payable for the provision of information, to cover our reasonable costs of retrieving that information.

If you would like a copy of the information, which we hold about you or believe that any information we hold on you is inaccurate, out of date, incomplete, irrelevant or misleading, please email us at support@thepetspot.com.au. We will respond to any request within a reasonable time.

We will endeavour to promptly correct any information found to be inaccurate, incomplete or out of date. If we cannot take reasonable steps to correct the information because such correction is not technically possible or would be impracticable for us to perform, we may be unable to continue to provide services to you. In these cases, we will provide reasons for denial of your correction request.

If we refuse to correct your personal information you have the right to associate with the information a statement that the information is inaccurate, out of date, incomplete, irrelevant or misleading. We will take such steps that are reasonable in the circumstances to associate that statement with all records containing the relevant information.

We reserve the right to refuse to provide you with information that we hold about you, in certain circumstances set out in the Privacy Act. If we cannot provide access to your information, we will generally provide you with the reasons why and the mechanisms to complain about that refusal.

There is no cost involved for you to make a correction request or for the correction of your information.

12. Making a complaint and how it will be handled

If you believe that we have breached any obligation under Part IIIA of the Privacy Act and wish to make a complaint about that breach, please contact us by email at support@thepetspot.com.au setting out details of the breach. We will promptly investigate your complaint and respond to you in writing setting out the outcome of our investigation, what steps we propose to take to remedy the breach and any other action we will take to deal with your complaint.

It would assist us to ensure we properly understand your complaint, and allow us to respond more promptly, if complaints are made in writing and include as much detail as possible.

We will deal with any complaint in a timely, effective and consistent manner. We will acknowledge the receipt of your complaint within 7 days, and endeavour to make a decision on the complaint within 30 days after it is received. If we need more time to resolve your complaint, then we will notify you as to the delay.

If you feel that we have not satisfactorily addressed your complaint, you may also make a complaint to the Office of the Australian Information Commissioner by visiting www.oaic.gov.au, emailing enquiries@oaic.gov.au or writing to GPO Box 5218 Sydney NSW 2001.

13. Complaints about privacy

If you have any complaints about our privacy practices, please feel free to send in details of your complaints to support@thepetspot.com.au. We take complaints very seriously and will respond shortly after receiving written notice of your complaint setting out the outcome of our investigation, what steps we propose to take to remedy the breach and any other action we will take to deal with your complaint.

If you feel that we have not satisfactorily addressed your complaint, you may also make a complaint to the Office of the Australian Information Commissioner by visiting www.oaic.gov.au, emailing enquiries@oaic.gov.au or writing to GPO Box 5218 Sydney NSW 2001.

14. Changes to Privacy Policy

Please be aware that we may change this Privacy Policy in the future. We may modify this Policy at any time, in our sole discretion and all modifications will be effective immediately upon our posting of the modifications on our website or notice board. Please check back from time to time to review our Privacy Policy.

15. Third party sites

Our site may from time to time have links to other websites not owned or controlled by us. These links are meant for your convenience only. Links to third party websites do not constitute sponsorship or endorsement or approval of these websites. Please be aware that PETspot is not responsible for the privacy practises of other such websites. We encourage our users to be aware, when they leave our website, to read the privacy statements of each and every website that collects personal identifiable information.

16. Enquiries

If you have any concerns or queries about our Privacy Policy, or if you would like more information about privacy-related issues, please contact us at support@thepetspot.com.au.