

PRIVACY POLICY

JAGO GROUP PTY LIMITED A.C.N. 610 623 339

Our Privacy Commitment

1. Jago Group Pty Limited A.C.N. 610 623 339 ("**Jago**") is committed to managing your personal information openly and transparently and to keeping your personal information safe. We will endeavor to fulfil this commitment, including by:
 - (a) complying with the Australian Privacy Principles ("**APPs**");
 - (b) ensuring that we manage your personal information openly and transparently;
 - (c) only collecting personal information from you that we need in order to offer you the best possible service and advice;
 - (d) telling you how we might use your personal information;
 - (e) letting you know if we need to disclose your personal information to anyone else (including anyone overseas) and if so, in what circumstances this might occur;
 - (f) keeping your personal information secure;
 - (g) promptly responding to any request by you not to receive direct marketing material from us;
 - (h) making sure your personal information is kept accurate and up to date and to properly dispose of any personal information which is no longer required by us; and
 - (i) ensuring that, where appropriate, you can access and correct your personal information.

About this Policy

2. This policy is intended to explain clearly and in plain language some of the key processes and procedures that we have implemented to manage your personal information, to protect your privacy and to comply with the *Privacy Act 1988* ("**Act**") and the APPs.
3. References to "our", "us" and "we" in this policy are references to Jago. This policy is intended to apply to our application which can be accessed and downloaded through any device connected to the internet ("**Application**") and our website which can be accessed through <http://getjago.com> ("**Website**").
4. This policy gives a broad overview of our policies in relation to privacy but if you require further information, you are welcome to contact us or to read any of the privacy statements or notices that will be issued to you as and when personal information is collected.

5. You should read this privacy policy before providing us with any personal information or before using our Application or our Website. By providing us with your personal information or by using the Application or our Website, you are confirming your agreement to the policies and procedures described in this privacy policy.

What sorts of personal information do we collect?

6. We will only collect from you information that is necessary and relevant to our relationship with you, including to enable us to provide to you the best possible service.
7. The types of personal information we collect includes, but is not limited to, name, contact details (including, mailing address phone number, email address and facsimile number), Australian Business Numbers, bank account details and credit card numbers.
8. The Act places restrictions on us collecting sensitive information about you (which includes information about your religion, political views, ethnicity, criminal records and sexual preferences). Generally we will not collect this type of information from you.

Why do we require your personal information?

9. Usually, the main reason that we will need to collect your personal information is to compile, analyse and publish feedback from individuals in respect of products or services that have been purchased by those individuals ("**Review**").
10. We may also use your personal information for other reasons, including to:
 - (a) contact you in relation to particular goods or services, information or an event that you might be interested in;
 - (b) prevent fraud and other criminal activities;
 - (c) manage your employment with us;
 - (d) assist us to run our business and to improve our services and performance, including staff training, accounting, risk management, record keeping, archiving, systems development and undertaking planning, research and statistical analysis; and
 - (e) comply with our legal obligations.
11. There is no obligation for you to provide us with any of your personal information but if you choose not to provide us with your personal information, we may not be able to contact you or to provide you with the services that you require.

12. By agreeing to accept the terms of this policy and in providing your personal information to us, you are taken to have consented to the use of your personal information for the above purposes.

How do we collect your personal information?

13. There are a few methods through which we may collect your personal information depending on the way in which we come in contact with you.
14. We may collect your personal information from one or more of the following methods:
 - (a) directly from you, either in person, over the phone, through completed forms or by email;
 - (b) from third parties where you have specifically authorised us to do so;
 - (c) through the Application or the Website; or
 - (d) from publicly available sources, for example, the electoral role, the telephone directory or from other websites.
15. We will always collect your personal information directly from you unless it is impracticable to do so. This would usually be done in person, over the telephone, by email or through your use of our Application or the Website.
16. Your personal information will not be collected if you are only browsing our Application or our Website but we do use cookies to better tailor our information and our services to meet your needs. A cookie is a small piece of text that is placed within the memory of a computer and can be later retrieved by web page servers. Cookies are used to enhance your interaction and convenience in using our Application and our Website and we do not use cookies to record any of your personal information. Cookies may record information about your visit, including the type of browser and operating system you use, any previous websites you visited, your server's IP address, the pages you access and the information downloaded by you. While this anonymous statistical data may be aggregated and used in broader statistical analysis by us and our web monitoring service provider to improve our services, at no time can we personally identify you as the source of that data.

Collecting personal information about others

17. You represent to us that where you provide personal information to us about another person, you are authorised to provide that information to us, and that you will inform that person about the contents of this privacy policy including who we are, how we use and disclose personal information, and that they can gain access to, and correct, that information.

Unsolicited personal information

18. From time to time we may receive personal information about you that we have not requested. In these circumstances, we will only hold onto such information where it is necessary to do so.

How do we use or disclose your personal information?

19. We may use and disclose your personal information for the purposes for which it was collected or for a related purpose such as to:
- (a) register and maintain your account on our Application or on our Website, including to allow access to and use of our Application or our Website;
 - (b) conduct market research and development, compile and analyse statistics and trends, and record statistical data (including by way of reports), including in relation to the Review;
 - (c) enable us to publish the Review on the Application and on our Website;
 - (d) communicate with you in general, including in relation to the Application or the Website;
 - (e) respond to your questions and comments, including to maintain our relationship with you;
 - (f) measure interest in, and improve our products and services (including the Application or the Website);
 - (g) resolve disputes or troubleshoot problems;
 - (h) prevent potentially prohibited or illegal activities, including fraud or other criminal activities;
 - (i) consider your requirements and how we can best advise and service you;
 - (j) enable us to provide our services to you;
 - (k) carry out or respond to your questions and requirements;
 - (l) our third party service providers to assist us in providing and improving our services to you, including IT support and events planning;
 - (m) analyse developments and trends in the industry to develop, improve and market our services to you;
 - (n) comply with reporting and legal obligations;
 - (o) regulatory bodies and law enforcement officials and agencies as required in relation to our services, to protect against fraud and for related security purposes;
 - (p) perform administrative and operational tasks (including risk management, systems development and testing, staff training and collecting debts);

- (q) include in a database compiled by us or our third party service providers for use in direct marketing of services and events that we, or our third party service providers, think may be of interest to you;
 - (r) seek your feedback in relation to client satisfaction and our relationship with you;
 - (s) monitor or improve the quality and standard of service that we provide to you;
 - (t) consider any concerns or complaints you may raise against us;
 - (u) better understand your preferences; and
 - (v) subsidiaries, related bodies corporate and controlled entities of Jago and to our agents, successors and/or assigns, for the uses outlined above.
20. By agreeing to accept the terms of this privacy policy and in providing your personal information to us, you are taken to have consented to the use and disclosure of your personal information for the above listed purposes.
21. Other than as outlined above, we will not disclose your personal information without your consent unless such disclosure is permitted or required by law.

Do we share your personal information with others?

22. We may share your personal information with entities related to Jago.
23. We deal with third party service providers who may assist us with a variety of functions including with marketing, research, mail and delivery, security, insurance, professional advisory (including legal), banking, payment processing, credit reporting or technology services. Where we engage third party service providers to perform services for us, those third parties may be required to handle your personal information. Under these circumstances, those third parties must safeguard this information and must only use it for the purposes for which it was supplied and we will make all reasonable enquiries to try to ensure that this is the case.
24. By providing your personal information to us, you consent to your personal information being shared with third parties as set out in this policy. We will not disclose personal information obtained from you to any third parties, other than those set out in the policy, unless you consent otherwise.

Do we use your personal information for marketing purposes?

25. As part of the services that we provide to you, we may:
- (a) use personal information that we have collected about you to identify information or a service that may benefit you; and
 - (b) contact you from time to time to let you know about information or a service that we believe you might be interested in.

26. Where we intend to use your personal information for direct marketing purposes (including the purposes set out above), we will specifically request your consent (generally through an opt-in box on our Website or on our Application). Where you do not wish for your personal information to be used for direct marketing purposes, you can opt-out, unsubscribe or make a request not receive direct marketing communications from us, by calling 1300 JAGO (1300 5246) or by emailing us at privacy@getjago.com or by logging such a request through our Application or our Website at any time. Additionally, each direct marketing communication, including all emails, will include an opt-out or "unsubscribe" option which will immediately indicate to us that you no longer wish to receive materials of this kind. If you make a request not to receive direct marketing communications from us, we will stop sending you these materials.

How do we store your personal information?

27. We hold personal and special categories of information in electronic formats. We have in place reasonable commercial standards of technology and operational security to protect the information we hold from loss, misuse and interference and from unauthorised access, modification or disclosure.
28. We take all necessary steps to destroy or permanently de-identify your personal information where it is no longer required and to protect your personal information from loss, misuse and interference and from unauthorised access, modification or disclosure.
29. While care is taken to protect your personal information on our Application and our Website, unfortunately no data transmission over the internet is guaranteed as 100% secure. Accordingly, we cannot ensure or warrant the security of any information you send to us or receive from us online. This is particularly true for information you send to us via email as we have no way of protecting that information until it reaches us. Once we receive your personal information, we are required to protect it in accordance with the Act.

Maintaining your personal information

30. We take reasonable steps to ensure that:
- (a) the information that we collect about you is accurate, complete and up-to-date at the time of collection;
 - (b) when we use your personal information, it is accurate, up-to-date, complete and accurate at the time of use; and
 - (c) if we disclose your personal information, it is accurate, up-to-date, complete and accurate at the time of disclosure.

Will we disclose your personal information to anyone overseas?

31. There may be circumstances where we need to disclose personal information that we hold about you to a third party overseas ("**Overseas Recipients**"). This may occur, for example, where we engage a third party service provider to assist in the provision of our services or where we have a database or server hosted outside Australia.
32. Prior to us disclosing your personal information to an Overseas Recipient, we have an obligation under APP 8.1 to take reasonable steps to ensure that the Overseas Recipient does not breach the APPs in relation to your personal information, as well as an obligation under APP 6 to only disclose your personal information to an Overseas Recipient for the primary purpose for which that personal information was collected (unless an exception applies under APP 6) (the "**Overseas Disclosure Obligations**").
33. We will take all reasonable steps to satisfy our Overseas Disclosure Obligations.
34. The countries to which we are most likely to send your personal information include United States of America and United Kingdom.

How can you access your personal information?

35. Usually we will be able to provide you with access to your personal information upon receipt of your email request, sent to privacy@getjago.com, and confirmation of your identity. There are some limited circumstances in which we may not be able to provide you with access to your personal information when requested. Such circumstances might include where access would pose a serious threat to the life, health or safety of another person or where such access would unreasonably impact on the privacy of others.
36. If we deny you access to your personal information for any reason, or if we are unable to provide you with access to your information in the manner requested by you, then we will provide you with a written notice confirming:
 - (a) the reason for such refusal; and
 - (b) the procedure to complain about the refusal.
37. We may recover from you our reasonable costs of supplying you with access to your personal information but we will not charge you for any request you might make to access your information.

How can you seek to correct your personal information?

38. We do what we can to ensure that the information we hold about you is accurate, complete, up-to-date, relevant and not misleading. To assist us to do this, please

ensure that you provide us with correct information at the time you provide it to us and immediately inform us if your details change at any time. If we are concerned that any of your information is inaccurate, incomplete, out-of-date, irrelevant or misleading, or if you request that we correct any of your information, then we will take all reasonable steps to correct the information to ensure that it is accurate, complete, up-to-date, relevant and not misleading in the context of the purpose for which it is held.

39. If we refuse to correct your personal information following a request by you to do so, then we will provide you with a written notice confirming:
- (a) the reason for such refusal; and
 - (b) the procedure to complain about the refusal.
40. We will not charge you for any request to correct your personal information, nor will we pass on to you any costs incurred by us in correcting your personal information or for associating a statement with your personal information.

What if you want to make a complaint about some aspect of our privacy procedures?

41. We are committed to maintaining and protecting your privacy but it is possible that in limited circumstances, mistakes might be made. If you are concerned with the way your personal information has been handled then you are entitled to make a complaint. If you would like to lodge a complaint, please contact us through our Privacy Compliance Officer, whose details are set out below.

Terry Wiley
privacy@getjago.com
 1300 JAGO (13005246)

42. If your personal information has not been handled in an appropriate way, we will do our best to remedy your concerns as quickly as possible, including by acknowledging receipt of your complaint within 48 hours and trying to resolve the complaint within 10 working days. Where this is not possible, we will contact you within this period to let you know an anticipated time frame within which your complaint will be resolved.
43. If your complaint is not satisfactorily resolved, you may approach an external dispute resolution service or apply to the Office of the Australian Information Commissioner ("OAIC") to have the complaint heard and determined.

Protecting your identity

44. Wherever it is practicable, we will always provide you with the option not to identify yourself when dealing with us or to use a pseudonym to protect your identity. Due to the nature of our business however, it will usually not be practicable for us to deal with you anonymously or by pseudonym.

Our Website and Application

45. Our Website and our Application may contain links to other applications or websites which are owned or operated by other parties. You should make your own enquiries as to the privacy policies of those parties. We are not responsible for information on, or the privacy practices of, such websites.

Changes to this policy

46. From time to time it may be necessary for us to review and revise this privacy policy. We reserve the right to change our privacy policy at any time.

How can you contact us?

47. Please find below our contact details. Please do not hesitate to contact us in relation to any privacy-related concerns and we will use our best endeavours to address any such concerns thoroughly and in a timely manner.

Terry Wiley
privacy@getjago.com
 1300 JAGO (13005246)

48. If it is practical to do so, you can contact us without identifying yourself. However, if you choose not to identify yourself, it may be more difficult for us to assist you with your enquiry. This will depend on the nature of your enquiry.

49. Please note that the Act contains certain exemptions which may permit us to use your personal information in a particular way if specific circumstances arise. Any such exemptions under the Act will take priority over this privacy policy to the extent of any inconsistency.

Express consent to collection, storage, use and disclosure

50. In addition to the other consents provided by you above, by agreeing to accept the terms of this privacy policy, or by providing your personal information to us, or both, you are taken to have expressly consented to the collection, storage, use and disclosure of your personal information for each of the purposes and to all of the parties outlined in this privacy policy.