

Privacy is our utmost concern and we detail exactly how we deal with your private information. We avoid asking for more than we need to be able to process your request.

We understand the process of revealing personal information can invoke immediate fear and distrust and to be asked to do so is incredibly stressful. **You do not have to reveal personal information when you use Red Cloud.** We are only interested in migrating your website to our server, processing payment and being able to contact you if there's any issues.

The more information you are able to provide for us, the speedier we can process your request. The only information that remains if you decide to host with us is your contact details for us to refer to.

If you cannot fully understand the formal language of the Privacy Policy, we encourage you to get leave us a message and a member of the team will happily provide a more accessible explanation.

## Privacy Policy

In this policy, "us", "we" or "our" means **Finelines Association Pty Ltd** (ABN 39 604 118 121) and its related bodies corporate.

This policy sets out:

- what is considered personal information;
- what personal information we collect and hold;
- how we collect, hold, use or disclose personal information;
- the purposes for which we collect personal information;
- what happens if we are not able to collect personal information;
- how to seek access to and correct your personal information; and
- how to contact us.

We are bound by the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) (subject to exemptions that apply to us under that Act). However, due to the nature of some of our business activities, from time to time, we will handle personal information.

We may, from time to time, review and update this policy, including taking account of new or amended laws, new technology and/or changes to our operations. All personal information held by us will be governed by the most recently updated policy.

## WHAT IS PERSONAL INFORMATION

When used in this policy, the term "personal information" has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. This may include (but is not limited to) your name, age,

gender, postcode and contact details (including phone numbers and email addresses) and possibly financial information, including your credit card, direct debit or PayPal account information. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

## **WHAT PERSONAL INFORMATION CAN WE COLLECT AND HOLD**

We may collect the following types of personal information:

- name;
- email address;
- telephone number;
- details of the products and services you have purchased from us or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries;
- any additional information relating to you that you provide to us directly through our websites or indirectly through use of our website or online presence through our representatives or otherwise.

## **COOKIES**

In some cases we may also collect your personal information through the use of cookies. When you access our website, we may send a “cookie” (which is a small summary file containing a unique ID number) to your computer. This enables us to recognise your computer and greet you each time you visit our website, without bothering you with a request to register or log-in. It also helps us keep track of products or services you view, so that we can send you news about those products or services. We also use cookies to measure traffic patterns, to determine which areas of our websites have been visited, and to measure transaction patterns in the aggregate. We use this to research our users’ habits so that we can improve our online products and services. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them. We may also log IP addresses (the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track user movements, and gather broad demographic information.

We may also collect anonymous data (which is not personal information) relating to your activity on our websites (including IP addresses) via cookies, or we may collect information from you in response to a survey. We generally use this information to report statistics, analyse trends, administer our services, diagnose problems and target and improve the quality of our products and services. To the extent this information does not constitute personal information because it does not identify you or anyone else, the Australian Privacy Principles do not apply and we may use this information for any purpose and by any means whatsoever.

## **HOW WE COLLECT PERSONAL INFORMATION**

- **Log Files.** Any time you visit any of our websites, our servers automatically gather information from your browser (such as your IP addresses, browser type, Internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks) to analyse trends, administer the site, prevent fraud, track visitor movement in the aggregate, and gather broad demographic information. For example, we may log your IP address for system administration purposes. IP addresses are logged to track a user's session. This gives us an idea of which parts of our site users are visiting. We do not share the log files externally.
- **Web Beacons.** "Web beacons" (also known as "clear gifs" and "pixel tags") are small transparent graphic images that are often used in conjunction with cookies in order to further personalize our website for our users and to collect a limited set of information about our visitors. We may also use web beacons in email communications in order to understand the behaviour of our customers. We do not link the web beacons to any PII.
- **E-mails and Telephone Calls.** We fully comply with the requirements of the Australian *Spam Act 2003* (Cth). We require an e-mail address from you when you register for our services. We use your e-mail for both transactional and promotional (e.g., newsletters, new product offerings, special discounts, event notifications, special third-party offers) purposes. E-mail messages we send you may contain code that enables our database to track your usage of the e-mails, including whether the e-mail was opened and what links (if any) were clicked. Your consent to our providing the promotional information will be implied unless you notify us that you do not wish to receive this information. If you would rather not receive promotional e-mails from us, please see the section below labeled "Choice/Opt-Out". We reserve the right to send you certain communications relating to our services, such as service announcements and administrative messages, without offering you the opportunity to opt out of receiving them. We may also contact you by telephone or text message (including to any wireless number you may provide to us) solely in connection with our services. If you would rather not receive telephone calls or text messages from us, you may delete your number from your account preferences page(s), or ask to be removed from our contact list if you receive a call or text message from us.
- **Demographic Data.** Demographic data is also collected at our site. We use this data to tailor our visitors' experience at our site, showing them content that we think they might be interested in, and displaying the content according to their preferences. Some of this information may be shared with advertisers on a non-personally identifiable basis.
- **Online Survey Data.** We may periodically conduct voluntary member surveys. We encourage our members to participate in such surveys because they provide us with important information regarding the improvement of our services. You may also volunteer for certain surveys that we may offer to our users, and any additional rules regarding the conduct of such surveys will be disclosed to you prior to your participation. We do not link the survey responses to any PII, and all responses are anonymous.

To request removal of your personal **information**, please contact us at PO BOX 2031 FITZROY VICTORIA 3065. In some cases, we may not be able to remove your

personal information, in which case we will let you know if we are unable to do so and why.

## **WHY WE COLLECT, HOLD, USE AND DISCLOSE PERSONAL INFORMATION**

The primary purpose for which we collect information about you is to enable us to perform our business activities and functions and to provide best possible quality of customer service. We collect, hold, use and disclose your personal information for the following purposes:

- to provide products and services to you;
- to provide you with news, information or advice about our existing and new products and services;
- to communicate with you including by email, mail or telephone;
- to manage and enhance our products and services;
- to personalise and customise your experience;
- to provide you with access to protected areas of our websites;
- to conduct competitions or promotions on behalf of us and selected third parties;
- to verify your identity;
- to provide as part of business data to third parties if you have authorised us to do so;
- to conduct business processing functions for operation of our websites or our business;
- for our administrative, marketing (including direct marketing), promotional, planning, product/service development, quality control and research purposes, or those of our contractors or external service providers;
- to provide your updated personal information to us, our contractors or external service providers;
- to investigate any complaints about or made by you, or if we have reason to suspect that you are in breach of any of our terms and conditions or that you are or have been otherwise engaged in any unlawful activity; and/or
- as required or permitted by any law (including the Privacy Act).

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

## **WHAT HAPPENS IF WE CAN'T COLLECT YOUR PERSONAL INFORMATION**

If you do not provide us with the personal information described in this policy, some or all of the following may happen:

- we may not be able to provide you with the products or services you requested, either to the same standard, or at all (for example, if you do not register as a member of a website, you will not be able to access features or services that are reserved for members only);

- we may not be able to provide you with information about products and services that you may want; or
- we may be unable to tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful.

## **HOW DO WE DISCLOSE YOUR PERSONAL INFORMATION**

We may disclose your personal information to:

- our employees, related bodies corporate, contractors or external service providers for the operation of our websites or our business, fulfilling requests by you, and otherwise provide products and services to you, including without limitation, web hosting providers, IT systems administrators, payment processors, data entry service providers, electronic network administrators, and professional advisers such as accountants, solicitors, business advisors and consultants;
- specific third parties authorised by you to receive information held by us.

We will do everything within our power to protect your privacy, however if subpoenaed legally we cannot avoid disclosing your personal information to:

- the police, any relevant authority or enforcement body, or your Internet Service Provider or network administrator, for example, if we have reason to suspect that you have committed a breach of any of our terms and conditions, or have otherwise been engaged in any unlawful activity, and we reasonably believe that disclosure is necessary;
- as required or permitted by any law (including the Privacy Act).

## **DIRECT MARKETING MATERIALS**

We may send you direct marketing communications and information about products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS or email, in accordance with applicable marketing laws, such as the Spam Act 2004 (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.

In addition, at any time, you may opt-out of receiving marketing communications from us by contacting us (details below) or by using the opt-out facilities provided (e.g. an unsubscribe link). We will then ensure that your name is removed from our mailing list. We do not provide your personal information to other organisations for the purposes of direct marketing unless expressly authorised by you.

If you receive communications from us that you believe have been sent to you other than in accordance with this policy, or in breach of any law, please contact us using the details provided below.

## **ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION**

You may request access to any personal information we hold about you at any time by contacting us (details below). Where we hold information that you are entitled

to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We will not charge for simply making a request and will not charge for making any corrections to your personal information. If you make an access request, we will ask you to verify your identity. There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others, or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment, then we will add a note to the personal information stating that you disagree with it.

Members of our websites will generally be able to access and update their membership details online. We request that you keep your information as current as possible so that we may continue to improve our service to you.

## **HOW YOU CAN COMPLAIN ABOUT A BREACH OF PRIVACY**

If you believe your privacy has been breached by us, have any questions or concerns about our Privacy Policy please, contact us using the contact information below and provide details of the incident so that we can investigate it.

We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in a timely and appropriate manner.

Please contact us at:

PO BOX 2031 FITZROY VICTORIA 3065

## **SECURITY**

We will take all reasonable steps to protect the personal information that we hold from misuse, loss, or unauthorised access, including by means of firewalls, password access, secure servers and encryption of credit card transactions.

If you suspect any misuse or loss of, or unauthorised access to, your personal information, please let us know immediately.

## **LINKS**

Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

## **CHANGES TO OUR PRIVACY POLICY**

We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website. This privacy policy was last updated on **09 September 2019**.