

ICRM Pty Ltd Privacy Policy

August 2019

When a person interacts with **ICRM Pty Ltd ACN 611 341 390 (ICRM)** – whether by using ICRM’s Software for ordering a meal, cooking a meal, transportation for the purposes of shopping for the meal or delivering the meal, visiting ICRM’s website, signing up to a newsletter, applying for employment, or contacting ICRM by any means of communication, they are providing ICRM with personal information about themselves.

In dealing with this personal information ICRM is bound by Australian Privacy Principles (APPs) contained in the *Privacy Act 1988* (Cth) (the Act).

This Privacy Policy informs both prospective and existing clients and prospective and existing clients of our clients about when and how ICRM may collect personal information and how this information might be used. It also provides the tools for a person to inform ICRM of any correction to, or removal of that person’s information.

1. Scope of this Privacy Policy

1.1. General

This Privacy Policy applies to personal information collected by ICRM. In broad terms, “personal information” means any information or opinion about a person who is reasonably identifiable. Personal information includes but is not limited to:

- Your name;
- Your contact details, including email address, mailing address, street address, postcode and telephone number;
- Your age and date of birth;
- Your credit card details;
- Your preferences and or opinions;
- Information you provide to us through customer surveys;
- Details of the Software you access;
- Details of the products and services we have provided to you and products and services that you have enquired about;
- Your browser session and geo-location data, device;
- Your network information;
- Your statistics on accessing our Software;
- Information about your access and use of our Software;
- Additional personal information that you provide to us, directly or indirectly, through your use of our Software, associated applications, associated social media platforms and accounts from which you permit us to collect information; and
- Any other personal information requested by ICRM and/or provided by you or a third party.

1.2. Privacy and third-party organisations

- 1.2.1 This Privacy Policy only applies to ICRM. It does not apply to any other company or organisation, including organisations whose digital services are linked to ICRM's online content or services (such as social media platforms and online retailers); or any third party organisations who might be involved in the delivery of a service provided, or contracted to be provided, by ICRM. If a person is using a third-party website to interact with ICRM, or a person navigates from the ICRM website or Software to a separate website or Software to view advertising or to engage with a service, this activity is not covered by ICRM's Privacy Policy.

2 Collection of personal information

- 2.1 ICRM may collect, store, use and disclose a wide range of personal information in the course of its operations to enable ICRM to conduct its business, and to meet its legal obligations.
- 2.2 ICRM may collect personal information about a person for the following purposes:
- a) To provide a product or service requested by that person;
 - b) To improve the delivery of ICRM's services– by collecting information, it is possible for ICRM to adapt its services to meet a person's preferences and thereby enhance their use of ICRM's services.
 - c) To assess a person's employment suitability with ICRM – this includes reviewing the performance of a person already employed by ICRM; or assessing a person's suitability who is applying for employment, a temporary work-experience placement, or an internship.
- 2.3 In some circumstances, ICRM may source information about a person which is on the public record or information that can be requested from third parties. For example, when a person applies for a job at ICRM, ICRM will seek information from that person directly, but may also collect information from third parties (including previous employers and recruitment consultants).
- 2.4 ICRM may collect, store and use the following kinds of personal information:
- a) Information about a person's computer and about their visits to and use of ICRM's website or Software, including server IP address, top-level domain name (e.g. .au, .com, .gov), the date and time of the visit(s), the pages accessed and documents downloaded, advertising click-through metrics, the previous website visited or software accessed, and the type of browser used;
 - b) Information provided by a person to ICRM when subscribing with the ICRM's Software to receive email notifications, alerts and/or newsletters;
 - c) Information that a person provides to ICRM when registering with its Software;

- d) Information that a person provides to ICRM when completing their client profile, either through completing applications or other forms, or by ICRM recording the information that a person provides via telephone calls, interviews or any other form of communication;
 - e) Information contained in any correspondence that a person sends to ICRM either directly or through its website or Software;
 - f) Any other personal information that a person chooses to send ICRM.
- 2.5 ICRM and third parties contracted by ICRM make use of tracking device to enhance the functionality of its Software, including the use of cookies (flash and non-flash) and web beacons. These tracking devices are not used to record any personal information (such as names, email address). If a person chooses to opt out of these tracking devices that person may not be able to access all of the services on the ICRM Software. More information about opt-out options is available at www.youronlinechoices.com.au.
- 2.6 Some ICRM services and Software are integrated with third party social media services like Facebook or Twitter. A person can decide to access or log-in to the ICRM Software using their social media profile, or to connect an ICRM-related service to a third-party social media service. If a person does this, the information ICRM can collect may include their social media user ID information, and any further information that the person has permitted the social media site to share with ICRM. If a person accesses or connects to ICRM services via social media, they are consenting to ICRM collecting, storing, using and disclosing such information and content for any purpose, and at ICRM's absolute discretion.
- 2.7 Any posts made via social media on ICRM platforms may be publicly available and able to be found via search engines. ICRM strongly recommends that all users become familiar with the privacy settings and terms of use of social media accounts.
- 2.8 ICRM will only collect personal information about a person from that person unless it is unreasonable or impracticable to do so.

3 Using Personal Information

- 3.1 ICRM may use a person's personal information for the following purposes:
- a) Administer its Software and business;
 - b) Personalise its Software;
 - c) Enable a person to use of the services available on its Software;
 - d) Supply services purchased through its Software;

- e) Send non-marketing commercial communications;
 - f) Send email notifications that have been specifically requested;
 - g) Send marketing communications relating to ICRM, its business, industry or carefully selected third parties;
 - h) Deal with enquiries and complaints made by or about a person relating to the ICRM Software;
 - i) Keep its Software secure and prevent fraud;
 - j) Verify compliance with the terms and conditions governing the use of the ICRM Software.
- 3.2 When ICRM collects personal information from a person, such a person will generally be informed of the nature of the information that has been collected, the reason why it was collected, and how ICRM will use it.
- 3.3 Any person interacting with ICRM consents for ICRM to use or disclose any personal information that it has collected for any purpose specified in:
- a) This policy; or
 - b) The relevant pages of the ICRM Software; or
 - c) The *Privacy Act 1988*; or
 - d) Any other law that has jurisdiction over the State or Country in which ICRM operates.
- 3.4 Consent, as described in **Clause 3.3** above will only be taken to have been withdrawn by a person when that person sends written notice to ICRM's Privacy Officer explicitly withdrawing consent for their personal information to be used or disclosed by ICRM for any or all purposes.

4 Disclosing personal information

- 4.1 ICRM may disclose personal information to:
- a) Third party service providers for the purpose of enabling them to provide their services, including but not limited to: IT service providers, data storage, web-hosting and server providers, debt collectors, maintenance or problem-solving providers, marketing or advertising providers, legal advisors, financial advisors and payment systems operators;
 - b) ICRM's employees, contractors and related entities;

- c) ICRM's existing or potential agents or business partners;
- d) ICRM's sponsors or promoters of any competitions by ICRM;
- e) ICRM's credit reporting agencies;
- f) Courts, tribunals, regulatory authorities and law enforcement officers, as required by law;
- g) ICRM's agents or sub-contractors, who assist ICRM in providing information, products, services or direct marketing to ICRM's clients.

4.2 ICRM may disclose personal information for the following purposes:

- a) To provide a service that a person has requested;
- b) To measure a person's experience with ICRM's services;
- c) To customise, enhance or improve ICRM's services;
- d) To provide technical support, or respond to an enquiry;
- e) If permitted or required by law;
- f) To prevent or lessen a serious and imminent threat to a person's life or health; or
- g) For the purposes to which a person has consented to the disclosure (this may be express or implied).

4.3 Without limiting **Clause 4.2** above, ICRM may disclose personal information:

- a) To the extent that ICRM is required to do so by law;
- b) In connection with any ongoing or prospective legal proceedings;
- c) In order to establish, exercise or defend ICRM's legal rights; and
- d) To the purchaser (or prospective purchaser) of any business or asset to whom ICRM is (or is contemplating) selling.

4.4 If data about a person's use of ICRM's digital services is de-identified, aggregated or otherwise made anonymous, ICRM may collect, use and share that information for any purpose with third parties provided that in doing so ICRM does not reveal any personal information and the use is related to ICRM's activities.

4.5 In providing and managing the services and Software offered by ICRM, ICRM may make personal information available to third party services and content providers,

including providers of cloud services, website hosts, Software hosts and other companies.

- 4.6 Information that ICRM collects may be disclosed to third parties who operate overseas in order to enable ICRM to use the information in accordance with this policy.
- 4.7 ICRM will direct third parties who receive personal information to follow the same standards and obligations set out in this policy. However, ICRM does not take responsibility for the use of this information by third parties, particularly those operating overseas in countries which do not have data protection laws equivalent to those in force in Australia.

5 Anonymity and pseudonymity

- 5.1 Any person may interact with ICRM anonymously or under a pseudonym if they so choose. Where this is the case, ICRM may only be able to provide such a person with limited information or services.
- 5.2 In some cases it will not be practicable to interact with a person anonymously, or it may be impossible to provide the service that a person has requested without some form of personal information. For example, if a person wishes to subscribe to an ICRM email newsletter, an email address must be provided.

6 Access to records and Correction of information

- 6.1 A person is entitled to obtain access to records that contain personal information about him or her, except to the extent that ICRM is required or authorised to refuse access under any law of the Commonwealth that provides for access by persons to documents (e.g. *the Freedom of Information Act 1982 (Cth)*).
- 6.2 A person can obtain access to documents containing his or her personal information, as well as request that such information be corrected by ICRM, by contacting the ICRM Privacy Contact Officer. The ICRM Privacy Contact Officer will endeavour to respond to requests for access and correction in a timely manner.
- 6.3 ICRM will take reasonable steps to ensure that the personal information it holds is accurate, relevant to its purpose, up to date, complete and not misleading.

7 Storage and Security

ICRM are committed to ensuring the secure collection and storage of personal information.

- 7.1 Depending on how ICRM receives a person's personal information, ICRM may store the information in electronic and/or hard copy format.
- 7.2 ICRM takes all reasonable and practicable steps to ensure that the personal information it holds is protected against interference, unauthorised access and other forms of misuse. Measures taken may be physical, electronic, or procedural. ICRM staff are trained to treat personal information with care, and to use it in accordance with this Privacy Policy and current laws.
- 7.3 In ICRM circumstances where a person uses a third party platform to engage with ICRM, including but not limited to social media platforms, the person acknowledges that these platforms are not under the control of ICRM. Where a person has concerns over the security of any third-party platform, ICRM encourages the careful consideration of the terms and conditions and security used by any third party platform.
- 7.4 Any person who interacts with ICRM online or the ICRM website acknowledges that the transmission of information over the internet is inherently ICRM insecure, and that ICRM does not guarantee the security of data sent over the internet.
- 7.5 ICRM will ensure that upon becoming aware of holding personal information about a person and such information is either no longer required by ICRM, or that ICRM is not required by or under Australian law to retain the information; ICRM will take reasonable steps to destroy the information or to ensure that the information is de-identified.

8 Complaints

- 8.1 If a person believes that an act or practice of ICRM has interfered with their privacy they may make a complaint to ICRM. Such a person will need to identify themselves and provide his or her complaint in written form and addressed to the ICRM Privacy Contact Officer.
- 8.2 The ICRM Privacy Contact Officer will investigate all complaints and will endeavour to provide a written response within **30 days** of receipt of the complaint setting out ICRM's decision.
- 8.3 If a person is dissatisfied with ICRM's response to his or her complaint, he or she has the right to take their complaint to the Office of the Australian Information Commissioner. The Australian Information Commissioner may then investigate and attempt to conciliate the matter.

9 Cookies

ICRM and third parties contracted by ICRM make use of tracking device to enhance the functionality of its website and Software, including the use of cookies (flash and non-

flash) and web beacons. These tracking devices are not used to record any personal information (such as names, email address). If a person chooses to opt out of these tracking devices that person may not be able to access all of the services on the ICRM website. More information about opt-out options is available at www.youronlinechoices.com.au.

10 Relevant contacts

Further information about ICRM's Privacy Policy can be obtained by contacting the ICRM Privacy Contact Officer.

Telephone : 1300 790 592

Post: XXXX

Email: XXXX

Website: XXXX

Contact the Office of the Australian Information Commissioner (OAIC)

Contact details are set out on the OAIC website: <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>

Telephone: Enquiries line: 1300 363 992
If calling from outside Australia call +61 2 9284 9749
TTY: call 133 677 then ask for 1300 363 992
Speak and Listen users: call 1300 555 727 then ask for 1300 363 992
Internet relay users: connect to the National Relay Service then ask for 1300 363 992

Facsimile: (02) 9284 9666

Email: enquiries@oaic.gov.au

Post : GPO Box 5218
Sydney NSW 2001

Website: www.oaic.gov.au