

Polixen Privacy Policy

November 2019

Privacy is important to us and we know it matters to you.

When you interact with Polixen – including by using our products or services (including our software), visiting our website, signing up to our newsletter, applying for employment, or contacting us by any means for any other purpose, you may be providing us with personal information.

This policy sets out how we will collect, use, disclose and protect personal information.

We may change this policy by uploading a revised policy onto the website. The change will apply from the date that we upload the revised policy.

Personal Information

This Privacy Policy applies to personal information collected by **ICRM Pty Ltd** ACN 611 341 390, trading as Polixen (**Polixen**).

In broad terms, “personal information” means any information or opinion about an identified individual, or an individual who is reasonably identifiable.

This can include information such as your name, contact details (including address, email address, phone or mobile number), age and date of birth. It can also include financial information (such as credit card or bank account details), and information that allows us to identify you for verification purposes.

It also includes information about how and where a person uses our products and services, including details of the products and services you use or have enquired about, your location or the location of the devices you are using when accessing our products and services, as well as any other personal information requested by us and/or provided by you or a third party.

Personal information may also include your preferences and/or opinions, including any information we gather/you provide to us through customer surveys, newsletters, social media platforms, or email.

Sensitive Information

Sensitive information includes information about a person’s health, race, ethnic origin, religious or philosophical beliefs. Given the nature of Polixen’s services, we may collect some sensitive information. Sensitive information is subject to a higher level of privacy protection than other personal information, including an obligation to only collect and use sensitive information with consent or otherwise in accordance with applicable law or regulation.

Personal Information Belonging to Others

You might also need to provide us with personal information about other individuals (e.g. people you are caring for or other carers). If so, we rely on you to have informed these individuals that you are giving us their personal information and to have advised them about this privacy policy.

How we collect personal information

We may collect personal information in one of the following ways:

(a) when you give it to us – where practical, we will collect personal information from you directly. This might happen when you are setting up/accessing your account, or when you contact us;

(b) when you use our products and services – including when you use our software or our website, including via the use of cookies; and

(c) when we obtain it from a third party – including information gained from our business partners and/or customers, an outside source like a mailing list, or from public information (such as public posts to social media).

How we use personal information

We will only use your personal information where we have a lawful reason to do so, or where we have consent and/or a legitimate interest in using it. These circumstances include:

(a) to supply and manage the products and services we provide to you, maintain your account, administer our software and business (including keeping our software secure and preventing fraud or unauthorised use) and to update our records;

(b) for business analysis and business intelligence in order to maintain and improve our products and services and develop new ones, and/or to better tailor or personalise our products and services;

(c) to communicate with you regarding your services, your account and/or to send any notifications or emails and/or deal with any technical issues, enquiries or complaints;

(d) to send you marketing communications relating to Polixen, its business, industry or carefully selected third parties;

(e) to verify compliance with the terms and conditions governing the use of the Polixen software and/or

(f) to assess your suitability as an employee, contractor, intern, supplier or business partner.

When we disclose personal information

We may share personal information with other parties who provide services to us, including organisations, agents, partners and contractors that assist us in providing our products and services. These may include IT service providers, data storage, web-hosting and server providers, payment systems operators, debt collectors, marketing or advertising service providers, legal advisers and financial advisers.

We may also share personal information with our employees, contractors and related entities, our shareholders or investors, our agents or business partners, our sponsors or promoters, or our agents and sub-contractors where they have a legitimate business, financial, or legal reason for accessing that information.

We may also disclose personal information to the extent we are required to do so by any applicable law or regulation; in connection with any ongoing or prospective legal proceedings; to establish, exercise or defend Polixen's legal rights (or those of any of its directors, employees, contractors, customers agents or partners); and/or to any prospective investor, shareholder or purchaser or prospective purchaser of any Polixen business or asset.

In some cases the organisations we share personal information with may be based outside the jurisdiction where the information is collected. When this occurs, we require those parties to take appropriate measures to protect that information and restrict how they use that information.

Consent to use or disclosure of personal information

You consent to Polixen using or disclosing any personal information it has collected for any purpose specified in this policy, in Polixen's terms and conditions, in Polixen's software, or for any other purpose permitted or authorised under any applicable law, including the Privacy Act 1988 and the Australian Privacy Principles.

You can withdraw your consent to our use of your personal information for any and all purposes by sending a written notice to Polixen using the contact details below. Such withdrawal of consent may mean we are no longer able to provide our products or services to us.

Accessing third party platforms

If you access another party's website or application using one of our products, then it is important to be aware that the other party will deal with your personal information in accordance with its own privacy policy.

How we keep personal information

Polixen may store information in electronic or hard copy format and keep it in storage facilities that we either own or operate ourselves, or that are owned or operated by our service providers.

We will take reasonable steps to keep personal information safe from loss, unauthorised access or other misuse.

In circumstances where you use a third party platform to engage with Polixen, you acknowledge that those platforms are not under our control. We encourage you to carefully consider the terms and conditions, privacy policies and security used by any such platform.

De-identified, aggregated and anonymous data

If data about your use of Polixen's services is de-identified, aggregated or otherwise made anonymous, then we may collect, use and share that information for any legitimate purpose with any other person, provided that in doing so we do not reveal any personal information and the use is related to our business activities.

Anonymity and pseudonymity

You may choose to interact with Polixen anonymously or under a pseudonym. However, where you choose to do so, we may not be able to interact with you, or provide you with some or all of our products and services.

How you can access and correct your personal information

Under Australian privacy law, you have a general right to access your personal information, including your health information, or request your personal information be corrected. You can contact us to request access to or correct your details using our contact details below. Only you or another person you have authorised, such as a legal guardian or authorised agent, can make the request. We will endeavour to respond to requests for access and correction in a timely manner.

How you can make a privacy complaint

You can use our contact details below to notify us of any privacy complaint you may have against us. We will endeavour to respond to complaints in a timely manner. While we hope that we can resolve any complaints you may have without the need to involve third parties, you may also be able to lodge a complaint with a relevant regulator such as the Australian Information Commissioner.

How can you contact us?

If you have any questions about this privacy policy or our management of your information, you can call us on 1300 790 592, email us at info@polixen.com, or write to us at MC Box 1155, Wollongong, NSW 2500.