

### **PRIVACY POLICY**

#### NSW

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#### 1 PRIVACY POLICY

In this Privacy Policy, 'us' 'we' or 'our' 'ReadiNow' means ReadiNow Corporation Pty Ltd (ACN 149 568 712) and its related bodies corporate. You may mean a ReadiNow customer, partner or partner's end-customer or other subscriber ("Contact"). We are committed to respecting your privacy. Our Privacy Policy sets outs out how we collect, use, store and disclose your personal information.

By providing personal information to us, you consent to our collection, use and disclosure of your personal information within ReadiNow. We may change our Privacy Policy from time to time by publishing changes to it on our website or platform. We encourage you to check our website and platform periodically to ensure that you are aware of our current Privacy Policy.

Personal information includes information or an opinion about an individual that is reasonably identifiable. For example, this may include your name, age, gender, postcode and contact details.

Background with reference to the Privacy.

#### 1.1 WHAT PERSONAL INFORMATION DO WE COLLECT?

We may collect the following types of personal information:

- name;
- mailing or street address;
- email address;
- telephone number and other contact details;
- credit card information (not currently) but maybe in future online purchased apps;
- your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;
- details of the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries;
- any additional information relating to you that you provide to us directly through our website or app or indirectly through your use of our website or app or online presence or through other websites or accounts from which you permit us to collect information;
- information you provide to us through customer surveys; or

- any other personal information that may be required in order to facilitate your dealings with us.
- We may collect these types of personal information either directly from you, or from third parties. We may collect this information when you:
  - o register on our website, platform or app;
  - communicate with us through correspondence, chats, email, or when you share information with us from other social applications, services or websites;
  - o interact with our sites, services, content and advertising; or
- When you apply for a job or position with us, we may collect certain information from you (including your name, contact details, working history and relevant records checks) from any recruitment consultant, your previous employers and others who may be able to provide information to us to assist in our decision on whether or not to make you an offer of employment or engage you under a contract.

This Privacy Policy does not apply to acts and practices in relation to employee records of our current and former employees, which are exempt from the Privacy Act.

### 1.2 WHY DO WE COLLECT, USE AND DISCLOSE PERSONAL INFORMATION?

We may collect, hold, use and disclose your personal information for the following purposes:

- to enable you to access and use our website and services and our legitimate interest to provide you with content you access and request through any downloads from the website or platform;
- to operate, protect, improve and optimise our website and services, business and our users' experience, such as to perform analytics, conduct research and for advertising and marketing;
- to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- managing user registrations;
- to send you marketing and promotional messages and other information that
  may be of interest to you, including information sent by, or on behalf of, our
  business partners that we think you may find interesting;
- managing event registrations and attendance;
- to administer rewards, surveys, contests, or other promotional activities or events sponsored or managed by us or our business partners;
- developing and improving our website and platform;

- to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties; and
- to consider your employment application.
- We may also disclose anonymised information to a trusted third party. This third
  party may combine that information in order to enable it and us to develop
  insights so that we can better understand preferences and interests, and
  enhance the products and services that you receive.

## 1.3 DO WE USE PERSONAL INFORMATION FOR DIRECT MARKETING?

We and/or our carefully selected business partners may send you direct marketing communications and information about our products and services. This may take the form of emails, SMS, mail or other forms of communication, in accordance with the Spam Act 2003 (Cth) and the Privacy Act. You may opt-out of receiving marketing materials from us by contacting us using the details set out below or by using the opt-out facilities provided (eg an unsubscribe link).

## 1.4 TO WHOM DO WE DISCLOSE YOUR PERSONAL INFORMATION?

We may disclose personal information for the purposes described in this privacy policy to:

- our employees and related bodies corporate in Australia;
- third party suppliers and service providers (including providers for the operation of our websites and/or our business or in connection with providing our products and services to you);
- third party suppliers and service providers in Australia and overseas providing services in relation to the Platform;
- professional advisers, dealers and agents;
- payment systems operators (eg merchants receiving card payments);
- our existing or potential agents, business partners or partners;
- our sponsors or promoters of any competition that we conduct via our services;
- anyone to whom our assets or businesses (or any part of them) are transferred;
- specific third parties authorised by you to receive information held by us; and/or
- other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

#### 1.5 USING OUR WEBSITE AND COOKIES

- We may collect personal information about you when you use and access our website and platform.
- While we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit and the internet protocol address assigned to your computer.
- We may also use 'cookies' or other similar tracking technologies on our website that help us track your website and platform usage and remember your preferences. Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser but our websites may not work as intended for you if you do so.
- We may also use cookies to enable us to collect data that may include personal
  information. For example, where a cookie is linked to your account, it will be
  considered personal information under the Privacy Act. We will handle any
  personal information collected by cookies in the same way that we handle all
  other personal information as described in this Privacy Policy.

#### 1.6 SECURITY

We may hold your personal information in either electronic or hard copy form. We take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure and we use a number of physical, administrative, personnel and technical measures to protect your personal information. However, we cannot guarantee the security of your personal information.

#### 1.7 LINKS

Our website may contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, so we encourage individuals to read them before using those websites.

## 1.8 ACCESSING OR CORRECTING YOUR PERSONAL INFORMATION

• You can access the personal information we hold about you by contacting us using the "Contact Us" on our website located at: www.readinow.com or via: privacy@readinow.com.

- Sometimes, we may not be able to provide you with access to all of your
  personal information and, where this is the case, we will tell you why. We may
  also need to verify your identity when you request your personal information.
- If you think that any personal information we hold about you is inaccurate, please contact us and we will take reasonable steps to ensure that it is corrected.

## 1.9 INTERNATIONAL TRANSFER OF PERSONAL INFORMATION COLLECTED

From May 25, 2018, the processing of personal information of data subjects in the European Union ("EU") is subject to the EU General Data Protection Regulation ("GDPR").

Therefore, If you are an EU data subject, your personal information may be processed outside the EU and the European Economic Area ("EEA"), and in countries which are not subject to an adequacy decision by the European Commission and which may not provide for the same level of data protection in the EU or the EEA. In this event, we will take commercially reasonable steps to offer an adequate level of protection, for instance by entering into standard contractual clauses for the transfer of data as approved by the European Commission (Art. 46 GDPR).

#### 1.10 YOUR RIGHTS RELATING TO PERSONAL INFORMATION

You have certain rights regarding your personal information, subject to local data protection laws. These may include the following rights:

- to access your personal information held by us (right to access);
- to rectify inaccurate personal information and ensure it is complete (right to rectification);
- to erase/delete your personal information to the extent permitted by other legal obligations (right to erasure; right to be forgotten);
- to restrict our processing of your personal information (right to restriction of processing);
- to transfer your personal information to another controller to the extent possible (right to data portability);
- to object to any processing of your personal information carried out on the basis
  of our legitimate interests (right to object). Where we process your personal
  information for direct marketing purposes or share it with third parties for their
  own direct marketing purposes, you can exercise your right to object at any time
  to such processing without having to provide any specific reason for such
  objection; and
- to the extent we base the collection, processing and sharing of your personal information on your consent, to withdraw your consent at any time, without

affecting the lawfulness of the processing based on such consent before its withdrawal.

#### 1.11 YOUR RIGHTS RELATING TO CONTACT DATA

As described above, we may also process personal information in the role of a processor. If your data has been submitted to us by a ReadiNow Contact who is a partner or customer and you are an end-customer or other subscriber of that Contact wishing to exercise any rights you may have under applicable data protection laws, please inquire with that Contact directly. Because we may only access your data upon instruction from the respective Contact, if you wish to make your request directly to us, please provide the name of the ReadiNow Contact who submitted your data when you contact us. We will refer your request to that Contact, and will support them as needed in responding to your request.

# 1.12 MAKING COMPLAINT OR EXERCISING YOUR RIGHTS RELATING TO YOUR PERSONAL INFORMATION

If you think: i) we have breached the Privacy Act including the Privacy Amendment (Notifiable Data Breaches) Act 2017 (Cth), or any other applicable laws relating to the processing of personal information or the movement of that information, or ii) you wish to make a complaint about the way we have handled your personal information, or iii) you wish to exercise your rights as outlined in clause 1.10 above, you can contact us using the "Contact Us" on our website located atwww.readinow.com or via: privacy@readinow.com. Please include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint within a reasonable period of time. If you think that we have failed to resolve the complaint satisfactorily, we will provide you with information about the further steps you can take.