

## PRIVACY POLICY

BADGE is committed to the protection of your privacy and is bound by the Australian Privacy Principles for the handling of your information. BADGE's Privacy Policy can be examined by accessing our website <http://www.badge.net.au> or by obtaining a copy from your BADGE Client Manager or the BADGE Privacy Officer (+61 8 8293 5099, 9 Anzac Highway Keswick SA 5035).

### INTRODUCTION

The privacy of your personal information is important to Badge Holdings Pty Ltd (BADGE). We are committed to respecting your right to privacy and protecting your personal information. We are bound by the Privacy Act 1988 (Cth) and the National Privacy Principles contained in the Privacy Act, as well as other applicable laws and codes affecting your personal information. Our staff are trained to respect your privacy in accordance with our standards, policies and procedures.

### ABOUT THIS PRIVACY POLICY

This Privacy Policy outlines how we manage your personal information. It also describes generally the sorts of personal information held and for what purposes, and how that information is collected, held, used and disclosed.

Our Privacy Policy applies to all your dealings with us whether at our offices, through our employees, contractors, third party credit providers or other third party service providers, via our website or an adviser.

A copy of this Privacy Policy is available on our website at [www.badge.net.au](http://www.badge.net.au).

### COLLECTION OF PERSONAL INFORMATION

BADGE collects both personal information and anonymous information.

### HOW WE MAY COLLECT YOUR PERSONAL INFORMATION

BADGE usually collects personal information about you directly. For example, we collect personal information when you provide information to us by phone, email or social media, or when you enter your personal details on our websites.

We may also collect information about you indirectly, including from:

- our employees, agents, contractors or suppliers;
- third parties such as our related companies;
- third parties such as community organisations that we partner with;
- our customer's authorised representatives; and
- publicly available sources of information.

BADGE also collects information based on your use of our services. Your web browser automatically provides us with the type of browser you are using, when you visited BADGE, your top level domain name (for example .com, .gov, .au, etc.), the address of the website that directed you here, your server's IP address and which pages you viewed.

We will not combine information collected from your browser or device with personal information you have submitted without your prior consent. We only use this information for statistical and internal purposes including improving the functionality of BADGE's website for our users.

From time to time, BADGE may invite you to participate in surveys. These surveys are designed to ensure that our services as relevant to you as possible. BADGE will always advise if the survey is anonymous or if your participation will be linked to you in any way.

## WHAT DO WE DO WHEN WE GET INFORMATION WE DIDN'T ASK FOR?

Where we receive unsolicited personal information about you, we will check whether that information is reasonably necessary for our functions or activities. If it is, we'll handle this information the same way we do with other information we seek from you. If not, we'll ensure we do the right thing and destroy or de-identify it.

## WHY WE COLLECT YOUR PERSONAL INFORMATION

Your personal information is collected and used by BADGE so we can go about our day-to-day business of providing you a professional level of customer service.

For example, to:

- verify your identity;
- assess whether you are eligible for our services;
- provide information on projects completed by Badge which may be of interest to you
- provide the services you require;
- deal with enquiries and provide customer support;
- research and develop our services;
- answer direct enquiries;
- undertake business planning;
- provide you with information about our services that have contracted with Badge, or contacting you in relation to these services.
- comply with legal obligations where necessary
- allow us to run our business and perform administrative and operational tasks, such as:
  - training staff;
  - developing and marketing services;
  - risk management;
  - systems development and testing, including our website and other online channels;
  - undertaking planning, research and statistical analysis;
  - improving our services and website;
  - improving our marketing and promotional efforts; and
  - improving the accuracy of the personal information we hold

Personal information will not be used for any other purpose without the consent of its provider unless BADGE is required by law to disclose that information. BADGE may be required to disclose personal information to third parties in order to provide a service that you requested.

Other than in circumstances such as these, BADGE will not disclose personal information provided, such as name, address, email address or telephone number, to any organisation or person outside BADGE unless the provider has authorised BADGE to do so.

We may also use your personal information to get a better understanding of your needs. Unless you tell us otherwise, we may use this information to bring you services which we believe will benefit our customers. Upon receiving new services for the first time, our customers will be given the option to opt-out immediately of receiving future offerings of the item in question. If our customers are receiving promotional information from BADGE and do not wish to receive this information any longer, they can email "Unsubscribe" to BADGE on [badge@badge.net.au](mailto:badge@badge.net.au)

## HOW WE MAY SHARE YOUR PERSONAL INFORMATION

We may need to share your personal information to organisations outside BADGE, for example, with:

- suppliers so we can supply the service to you;
- a fraud-checking agency to carry out checks;
- specialist contractors for the purposes of research and development;
- our professional advisers, including our accountants, auditors and lawyers;
- your authorised representative or contact person in the manner you have agreed to;
- your legal advisers, if requested by you to do so;
- a specified recipient if a court order compels us to do so, and
- law enforcement agencies concerning the enforcement of criminal and other laws if we are compelled, or required to do so.

In ordering third party content made available through the BADGE network, you are providing permission for BADGE to provide your personal information to the sponsor or third party to ensure your order can be fulfilled.

## ANONYMOUS INFORMATION

BADGE may use anonymous information collected from you for internal purposes including improving our services.

Some anonymous demographic information may be provided to advertisers so they can assess whether they wish to participate in advertising or this information may play a role in the design of their advertisements for the website. All information disclosed in these circumstances will be stripped entirely of all personal information. Your personal information will not be disclosed.

## BADGE'S USE OF "COOKIES"

We may also collect data about visits to our websites for marketing and statistical purposes to improve the way we interact with you. We may use cookies (small files that are stored in your web browser) or other similar technology for these purposes.

BADGE uses cookies to 'remember' your browser between page visits. Cookies are pieces of information that a website can transfer to an individual's computer hard drive for tracking user navigation and customising site information to further improve the user experience. Cookies can make using BADGE's website easier, for example by storing information about your preferences on a particular website. The use of cookies is an industry standard and you'll find most major websites use them.

## HOW WE HOLD YOUR PERSONAL INFORMATION

We keep customer information on controlled systems, which are secure against unauthorised access. Proof of identity is always required before personal information is disclosed to any person, including the specific customer.

## HOW TO ACCESS & CORRECT YOUR PERSONAL INFORMATION

Customers can request their personal information we hold by contacting us by one of the methods listed at the end of this Privacy Policy. There is no fee for making such requests and we will endeavour to make the information available within 28 days of the initial request. BADGE reserves the right to confirm the customer's identity before providing them with this information.

BADGE takes reasonable precautions to ensure that the personal information we collect and use is complete, relevant and up-to-date. However, the accuracy of the personal information we receive depends to a large extent on the information provided to us. We recommend our customers let us know if there are any errors in their personal information by contacting BADGE.

## KEEPING YOUR PERSONAL INFORMATION ACCURATE AND UP-TO-DATE

We aim to make sure that the personal information we collect, use or disclose is accurate, complete and up-to-date. We will take reasonable steps to make sure this is the case.

This way we can provide you with better services.

If you believe your personal information is not accurate, complete or up to date, please contact us.

## LINKS TO OTHER WEBSITES

BADGE provides links to other websites when we consider you may be interested in the content on those sites. This in no way constitutes an endorsement of those sites or their content and BADGE has no control over the conduct of the companies or organisations operating those sites. Before you disclose any personal information to such a site, we advise you to check its terms and conditions, including its privacy and security policies.

## MAKING A COMPLAINT

If a customer has a concern about their privacy, they have a right to make a complaint and BADGE will do everything to put matters right.

To lodge a complaint, customers are to contact BADGE as provided below. BADGE will review your complaint and endeavour to resolve it immediately.

We acknowledge every complaint we receive and provide contact details of the investigating officer. We keep you updated on the progress we're making towards resolving your issue.

Usually, it takes only a few days to resolve a complaint. However, if we're unable to provide a final response within 30 days, we'll contact you to explain why and discuss a timeframe to resolve the complaint.

## CHANGES TO THIS PRIVACY POLICY

We reserve the right to change, modify or update this Privacy Policy at any time, without liability to you, by posting the revised version on our website. The revised version shall take effect immediately upon posting. You should therefore refer to this privacy policy on our website regularly.

## CONTACT US ABOUT OUR PRIVACY STATEMENT

If you have any queries concerning this privacy statement, please contact us [badge@badge.net.au](mailto:badge@badge.net.au) or by calling us on +61 8 8293 5099, or 9 Anzac Highway Keswick SA 5035.

Date: 30 June 2016