

iDeliver Privacy Policy

1. Introduction

- (a) The iDeliver Platform and iDriver App, the products or services made available to you on, or via, iDeliver Platform and iDriver App are created, operated and controlled by iConcept Pty Ltd (ACN 166 202 277) (**iConcept, we, us or our**).
- (b) As we are committed to ensuring your personal information is protected, we manage your personal information in accordance with the Australian Privacy Principles set out in the *Privacy Act 1988 (Cth)* (**Privacy Act**).
- (c) This Privacy Policy outlines how we collect, store, use and disclose your personal information (**Personal Information**), and how you may access your Personal Information (as defined in the Privacy Act) kept by us or how you may make a privacy complaint.
- (d) By accessing and using the iDeliver Platform and/or iDriver App you agree to this Privacy Policy.

2. The information we collect about you

2.1. Customers and User Network

- (a) For the purpose of this Privacy Policy:
 - (i) **Customers** are organisations or entities that purchase a subscription to access and use the iDeliver Platform and iDriver App.
 - (ii) **User Network** are offices, directors, employees, contractor or agents of the Customer or distributors and retailers, couriers and delivery drivers who have been authorised by the Customer to access and use the iDeliver Platform and/or iDriver App.
- (b) We will only collect and hold Personal Information about Customers and members of the User Network that are reasonably necessary to undertake our business activities and functions, provide the Customer and User Network with access to, and use of, the iDeliver Platform and/or iDriver App and deliver our products and services to Customers and User Network, or as otherwise permitted by law.
- (c) For example, the type of Personal Information that we collect includes:
 - (i) business details of Customers and members of the User Network (such as business or trading name, ACN, ABN, business and billing address, phone number (including after-hours phone number) email address and trading hours);
 - (ii) contact details of individuals employed or engaged by a Customer or member of a User Network (such as full name, email address, job title, work address details and in the case of drivers/couriers, date of birth);

- (iii) account information when you create an account on the iDeliver Platform or each time you access and use the iDeliver Platform (such as username and password); and
- (iv) payment and billing information of Customers (for example, credit card and bank account details and authentication information); and

2.2. Consumers

- (a) For the purpose of this Privacy Policy, **Consumer** is an individual or organisation that has purchased a product or a subscription to a newspaper, magazine, journal, catalogue or other printed media which is delivered to the Consumer's nominated address.
- (b) The type of Personal Information that we collect from Consumers are:
 - (i) full name;
 - (ii) address (billing and/or delivery address);
 - (iii) email address;
 - (iv) telephone number; and
 - (v) purchase order identifier; and
 - (vi) products or printed media ordered or purchased.

2.3. Other information

- (a) We may also collect and use:
 - (i) information relating to your dealings, or enquiries you have made, with us, including information about the products or services you have ordered;
 - (ii) information regarding your access and use of the iDeliver Platform and iDriver App, including location information, your computer's internet protocol (IP) address, unique device identifier, browser characteristics, device characteristics, operating system, language preferences, referring URLs, information on actions taken on your website, dates and times of visits to our website and other usage statistics; and
 - (iii) other information that you provide to us or that we may collect in the course of your use and access of the iDeliver Platform and iDriver App; or

- (iv) other information that you provide to us or that we may collect in the course of our relationship with you.

2.4. Sensitive Information

We do not collect your Sensitive Information (as defined by the Privacy Act).

3. How we collect Personal Information

3.1. We will collect Personal Information about you in a number of different ways. We may collect Personal Information directly from you or in the course of our dealings with you. For example:

- (a) contact and correspond with us (for example, when you participate in a promotion, competition, or survey, when you complete online forms or apply to use the iDeliver Platform, iDriver App, our products and services, subscribe to our publications, alerts and newsletters, or information you provide to us when you send us an email);
- (b) when you download, access or use iDeliver Platform and/or iDriver App;
- (c) in the case of subscribers, when you provide your Personal Information to the Customer or the User Network;
- (d) visit the iDeliver Platform, iDriver App or our website (including via cookies), contact us online or via telephone with a query, or request or make a comment on our social media sites;
- (e) provide your Personal Information to third parties (including to our affiliates, business partners and third party contractors, agents or suppliers and authorised third party service providers who perform functions on our behalf);
- (f) when apply for a position of employment with us;
- (g) from publicly available sources of information; or
- (h) when otherwise legally authorised or required to do so.

3.2. When we collect Personal Information directly from you, we will take reasonable steps to notify you (using a collection notice) at, before, or as soon as practicable after, the time of collection.

4. How we use your Personal Information

We use and disclose your Personal Information for the purposes for which the information is collected, including (but not limited to) to:

- (a) provide or deliver the iDeliver Platform, iDriver App and our products and services to you;
- (b) assist you with, or respond to, your IT or technical queries, which may relate to your access to, and use of, the iDeliver Platform and/or iDriver App;
- (c) inform you about the iDeliver Platform, iDriver App, our products and services, offers, competitions, promotions, events, questionnaires, modifications, updates or new version of the iDeliver Platform and/or iDriver App, planned or

unplanned maintenance or security updates, or other matters which we believe are of interest to you (such as recruitment or job opportunities);

- (d) share with our Third Party Providers;
- (e) administer, improve and manage the iDeliver Platform, iDriver App, our products and services (including the advertising and content on our website);
- (f) in the case of Customers, charge and bill you for the use of the iDeliver Platform, iDriver App and our products and services;
- (g) for internal record keeping;
- (h) for direct marketing purposes (see section 6 below); and
- (i) complying with our legal and regulatory obligations.

5. Disclosure to Third Parties

5.1. In order to provide or deliver the iDeliver Platform, iDriver App, our products, services and website to you, we may disclose your Personal Information to:

- (a) our affiliates, business partners, service providers, third party contractors, agents or suppliers and authorised third party service providers who perform functions on our behalf, such as our sales and IT consultants such as marketing and analysis organisations, third party payment processors and financial and credit card institutions in order to process any payments, hosting companies, web developers, internet service providers, telecommunication providers, customer service providers, customer support specialists, fulfilment companies, external business advisors (such as auditors and lawyers), research and data analysis firms (collectively, **Third Party Providers**);

5.2. We may also disclose your Personal Information to:

- (a) to any other party with your consent and direction;
- (b) law enforcement bodies or regulatory authorities to assist with their functions, or as otherwise required or authorised by law; and
- (c) any entity who acquires our business as part of any merger or acquisition.

5.3. Prior to the disclosure of Personal Information to Third Party Providers, we will take such steps as reasonable in the circumstances to ensure that the Third Party Providers treat your Personal Information securely and otherwise complies with the relevant Australian Privacy Principles in relation to the Personal Information.

6. Marketing communications

6.1. iConcept may use and disclose your Personal Information to send you information about the products or services we offer, as well as other information that may be of interest to you. We may send this information in a variety of ways, such as by mail, email, SMS, telephone, social media, or by customising online content and displaying advertising on the iDeliver Platform.

6.2. If you do not wish to receive any of these marketing communications, you can opt out by following the unsubscribe instructions included in the relevant marketing

communication, or by contacting us using the contact details set out in section 12 below.

7. No overseas disclosures of Personal Information

- 7.1.** All of our Third Party Providers are located in Australia and we do not disclose your Personal Information to overseas recipients in the course of providing you with access to the iDeliver Platform, the iDriver App and our other products or services.
- 7.2.** If we subsequently decide to disclose your Personal Information and Sensitive Information to an overseas recipient, we will take such steps as reasonable in the circumstances to ensure that the overseas recipient treats your Personal Information securely and otherwise complies with the relevant Australian Privacy Principles.

8. Notifiable Data Breaches Scheme

In the event of any loss, or unauthorised access or disclosure of your Personal Information that is likely to result in serious harm to you, we will investigate and notify you and the Australian Information Commissioner as soon as practicable, in accordance with notifiable data breach scheme contained in Part IIIC of the Privacy Act.

9. Security of your Personal Information

- 9.1.** We take steps reasonable in the circumstances to ensure that the Personal Information it holds is protected from misuse, interference and loss and from unauthorised access, modification, or disclosure.
- 9.2.** The transmission of information via the internet is not completely secure. We cannot guarantee the security of your data transmitted to our online services, and any transmission is at your own risk.
- 9.3.** We will destroy or de-identify Personal Information in circumstances where it is no longer required, unless we are otherwise required or authorised by law to retain the information.

10. Accessing and correcting your Personal Information

- 10.1.** We take steps reasonable steps in the circumstances to ensure that any Personal Information we hold is accurate, up-to-date, complete, relevant and not misleading. Under the Privacy Act, you have a right to access and seek correction of your Personal Information that is collected and held by us.
- 10.2.** If at any time you would like to access or correct the Personal Information we hold about you, or you would like more information about our approach to privacy, please contact us via the contact details set out in section 12 below. If we refuse your request to access or correct your Personal Information, we will provide you with written reasons for the refusal and details of complaint mechanisms.

11. Cookies

- 11.1.** iConcept use small text files placed on your computer called 'cookies' to collect standard log and visitor behaviour information in an anonymous form. We use this information to analyse how visitors use our website and to compile statistical reports on website activity. You can set your computer to reject cookies, but this may affect your ability to use certain parts of our website and the iDeliver Platform..

11.2. iConcept may also log your IP address. Your IP address is your computer's electronic Internet address. We may collect your IP address to see trends, run the website, track user movements, and gather broad demographic information.

12. Privacy complaints

If you have any complaints or issues you wish to raise with us regarding the way we have handled your Personal Information, or would like to discuss any issues about our Privacy Policy, please contact us directly by:

(a) email at customer.service@ideliver.net.au

12.2. If you are unhappy with a response that you have received from us, you may direct your complaint to the Office of the Australian Information Commissioner.
<https://www.oaic.gov.au/>

13. Changes to this Privacy Policy

From time to time it may be necessary for us to review and revise our Privacy Policy. We may notify you about changes to this Privacy Policy by posting an updated version on our website, or within the iDeliver Platform and/or iDriver App. We encourage you to check our website, the iDeliver Platform or iDriver App from time to time to ensure you are familiar with our latest Privacy Policy.