PRIVACY POLICY

Updated 1 July 2023

Privacy of your Personal Information

Hanrob Pty Limited (ABN 69 082 974 936) and Hanrob Holdings Pty Limited (ABN 96 634 532 764) ('Hanrob') are the owners and publishers of the content contained in this website and their application(s) if any. This privacy policy applies to Hanrob and their related entities.

We respect your privacy and are committed to handling your personal information in accordance with the Australian Privacy Principles in the *Privacy Act* 1988 (Cth). This privacy policy explains how we manage, collect, hold, store, secure, use, dispose of, and disclose your personal information which we collect about you, and how we maintain the quality and security of your personal information.

What is Personal Information?

Personal information is information or an opinion that personally identifies an individual directly or indirectly, whether true or not, and whether recorded in a material form.

What type of Personal Information do we collect?

The kinds of personal information we collect and store will depend on what products and services you request from us, the nature of your dealings with us, and what you choose to share with us. The information may include (amongst other things):

- personal information you give us when you request a product or service from us. This information may include the dates you intend to board your pet/s, preferred Vet Agency and details relating to your dog/s or cat/s;
- personal information you give us when you make a booking. This may include your name, address, telephone numbers, email address and credit card details;
- communications between you and us;
- transactional information about your use of our products and services (e.g. the feedback on your pet's stay with us or training experience or information provided to us when signing up to mailing lists, registering for events, completing surveys or submitting feedback);
- device information when you are using our website or applications (e.g. your device's IP address, search terms and pages visited on our website or applications, the date and time when pages were accessed, downloads, time spent on a page, bounce rate, referring domain, the previous site you visited and outlink if applicable, device type, operating system, and browser, information collected from your use of our application (such as your interaction with and activity in the application), integrated products and services information, your device's screen size, your geographic location to provide location based services, carrier and site interactions);
- information about students and families (e.g. contact and enrolment details, special training requirements, activities of students, staff and families if on Hanrob grounds or using Hanrob systems, networks, and software);
- third party account details (e.g where you sign in through a social network, we will collect limited personal information from that social network site, including your username, site ID and email address); and
- usernames and passwords (such as when using our Customer Portal).

How do we collect your Personal Information?

We may collect your personal information:

- directly from you or your parent or guardian, such as where you provided us with information, contacted us with a query or completed a form on our application or website, or when you deal with us in person, online, by telephone, letter or email;
- automatic data collection (such as cookies, and device location);
- from third parties like government regulators;
- when you subscribe to our mailing list;
- when you access and interact with our website or application;
- when you apply for a position with us as an employee, contractor or volunteer;
- via use of closed-circuit television or cameras on Hanrob sites; or
- from other sources.

We use social media applications such as Facebook and Instagram to communicate with the public. These services may collect your personal information and use it for their own purposes, but we will only use it to communicate with you and the public. Please find the Privacy Policies for <u>Facebook</u> and <u>Instagram</u> here.

In addition, we use Google's Youtube site to host videos embedded on our website. YouTube collects information about user activity including videos watched and interactions with content and advertisements. You can access Youtube's privacy policy <u>here</u>.

Our websites and applications use cookies, which are small data files transferred onto computers or devices by websites and applications. Most browsers allow you to choose whether to accept cookies or not. If you do not wish to allow cookies onto your device, please set your browser preferences accordingly.

We use third party and integrated products which may require your consent to use your personal information, or may require personal information including your name, address, contact details and financial information, including but not limited to products from the following entities:

- Edstart Australia Pty Ltd ABN 48 611 024 205;
- Web Active Corporation Pty Ltd (trading as Eway) (ACN 086 209 403);
- <u>Checkfront Inc;</u>
- <u>Gingr, LLC;</u>
- Pet Tech Pro;
- <u>Zoho Corporation;</u>
- <u>Wisenet.co;</u>
- WordPress.org;
- <u>EWay Web Active Corporation Pty Ltd;</u> and
- Stripe Payments Australia Pty Ltd A.C.N. 160 180 343

Securing your Personal Information

Our employees are responsible for handling your personal information and are educated about the requirements of the Australian Privacy Principles and the *Privacy Act*. Personal information that we hold on our systems is protected through the use of secure passwords and other security procedures including physical, network and computer security. Access to your personal information is limited to those who specifically need it to conduct their responsibilities. We take reasonable steps to destroy or permanently de-identify your personal information where it is no longer required and to protect your personal information from unauthorised access, disclosure, loss, misuse and alteration.

However, data protection and security measures are never completely secure (particularly for information sent online) and despite the measures we have put in place, we cannot guarantee the security of your information.

You must take care to ensure you protect your personal information (for example, by protecting any usernames and passwords etc) and you should notify us as soon as possible after you become aware of any security breaches.

Accuracy and Access to Personal Information

We will take reasonable steps to ensure that the information we hold about you is accurate, complete and up-to-date and ask that you let us know if you believe the information to be otherwise. You may request access to your personal information, provided your request is in writing and you provide us with proof of your identity. Your request will be responded to in a reasonable time and you may be asked to pay any reasonable costs incurred by us in responding to your request.

How Your Personal Information Will Be Used

We collect your personal information so that we can use it for our functions and activities, which include, amongst other things:

- processing your booking;
- being aware of any special requirements (health or otherwise) your pet/s may have;
- providing you with confirmation of your booking and advising you of any changes to your pet/s booking;
- confirming your pet's vaccination status;
- addressing any feedback or complaints you may have;
- assisting vets with any health care requirements that your pet/s may have;
- answering any queries you may have;
- any purposes for which it was requested and directly related purposes, and developing, improving and marketing our products and services; and
- billing you for use of services.

If you also subscribe to our mailing list, we may email you updates about our products and services. If you do not wish to remain a subscriber to our mailing list or otherwise receive updates on our products and services, you are able to remove your details from the subscriptions list.

We will assume you consent to management of your personal information in the manner specified in this Privacy Policy (which may change from time to time) and our Privacy Statement until you tell us to the contrary by following the instructions contained in our website or contacting us using our contact details below.

Why do we collect and use your Personal Information?

We collect and use your personal information for the following reasons:

- business planning and product development;
- seeking/obtaining professional advice;
- providing you with marketing and promotional material, including by direct marketing, information about other products and services;
- reviewing and improving our products, services and applications;
- where required by industry codes, or standards, and by law including law enforcement and national security agencies and other government and regulatory authorities (for example, to assist in connection with legal proceedings, crime or fraud protection, detection and prosecution);

- where essential for our website and applications to operate, a personalised experience;
- to educate students;
- to fulfil our legal requirements, including ensuring as far as is reasonably practicable, the health and safety of people in educational workplaces;
- to improve user experience when using our website and applications, and to understand and report on which content, pages and downloads are accessed by visitors;
- to improve both your and your pets experience when using any of our services and or products;
- to understand how videos perform on our website; and
- for record keeping purposes and to enhance functionality of our website and application.

While the anonymous statistical data we collect may be aggregated and used in broader statistical analysis by us and our web monitoring service provider to improve our services, at no time can we personally identify you as the source of that data.

Disclosure and Exchange of Personal Information with Third Parties

Personal information we collect from you may be disclosed:

- to any entity to which we are required or authorised by or under law to disclose such information (for instance, law enforcement agencies and investigative agencies, courts, various other government bodies);
- to others in the event of a medical emergency;
- to others that you have been informed of at the time any personal information is collected from you;
- to our business associates and others for purposes directly related to the purpose for which the personal information is collected;
- to our professional advisors and other contractors (e.g. IT consultants and mailing houses); or
- with your consent (express or implied), to others.

We may also obtain personal and other information from some or all of the above to enable us to provide our services or products to you. When we obtain personal and other information from third parties whom we are referred to by you, we will assume and you will ensure that you have made that third party aware of the referral of the persons and purposes involved in the collection, use and disclosure of the relevant personal or other information.

If we use or disclose your personal information for a purpose (the "secondary purpose") other than the main reason for which it was originally collected (the "primary purpose"), to the extent required by law, we will ensure that:

- the secondary purpose is related to the primary purpose of collection (and directly related in the case of sensitive information), and you would reasonably expect that we would use or disclose your information in that way; or
- you have consented to the use or disclosure of your personal information for the secondary purpose; or
- the use or disclosure is required or authorised by or under law; or
- the use or disclosure is otherwise permitted by law (for example, as a necessary part of an investigation of suspected unlawful activity).

We are required under the *National Vocational Education and Training Regulator Act 2011* (Cth) (NVET) to disclose personal information we collect to the National VET Data Collection kept by the National Centre for Vocational Education Research Ltd (NCVER).

Under NVET, we may disclose your personal information to relevant State or Territory training authorities (including personal information in enrolment forms) for statistical and mandatory

regulatory and research purposes, schools (for secondary students completing VET courses), employers (if an employer is paying for the education), and Commonwealth, State or Territory government departments and authorised agents (where funding is provided by same).

NCVER may disclose your personal information for purposes of issuing Statement of Attainments or VET Qualifications, populating Authenticated VET Transcripts, facilitiating statistics and research regarding education (including surveys), understanding how the VET market operates for policy, workforce planning and consumer information, and administering VET courses.

You may receive NCVER student surveys which may be administered by NCVER employees, agent or third party contractor, and which you may opt out of.

NCVER will collect, hold, use and disclose your personal information in accordance with the *Privacy Act*, VET Data Policy and all NCVER policies and protocols (including those on NCVER website at www.ncver.edu.au).

Anonymity

Where, possible, we will give you the option to interact with us anonymously or by using a pseudonym. However, if you do not provide us with your personal information, we will be unable to do one or more of the above (including being unable to accept any booking, contract with you, provide you with the information you may require, or otherwise interact with you.

Third Party Links

Our website may contain links to websites which are owned or operated by third parties. You should make your own enquiries as to the privacy policies of these third parties. We are not responsible for information on, or the privacy practices of, such websites.

Contacts

If you would like a copy of this privacy policy or you have a query or complaint relating to your privacy, please contact our Privacy Officer who will respond to you in a reasonable time.

The Privacy Officer Hanrob Pty Limited Telephone: <u>02 8508 3222</u> Mail: PO Box 105, Engadine NSW 2233 Fax: 02 8508 3255 Email: <u>info@hanrob.com.au</u>

If you remain unsatisfied you can visit the Office of the Australian Information Commissioner (OAIC) at <u>www.oaic.gov.au</u> to lodge a further complaint.