

PEISO PTY LTD
GDPR PRIVACY NOTICE
7 November 2020

If Peiso Pty Ltd (“**Peiso**”, “**our**”, “**us**” or “**we**”):

- we offer products or services to you whilst you are located in the EU; or
- we monitor your behaviour whilst you are located in the EU,

then our collection, use, disclosure and processing of your personal data is regulated by the General Data Protection Regulation (“**GDPR**”).

This GDPR Privacy Notice (“**Notice**”) explains how we use the personal data we collect when you use our website.

What is personal data?

Under the GDPR, personal data is any piece of information that relates to an identifiable person.

What personal data do we collect?

We collect the following types of personal data:

- *Identity details* – name, proof of identity (e.g. drivers’ licence, passport), proof of address (e.g. utility bill), photograph;
- *Account details* – username, password, profile picture;
- *Contact details* – email address, website address, phone number;
- *Location details* – physical address, billing address, timezone;
- *Identifiers issued by tax authorities* - unique identifiers provided by tax authorities;
- *Transaction details* – credit card details, wire transfer details, payment processor details;
- *Digital information* – information we collect from you electronically, including:
 - the date and time of visits to the website;
 - the pages viewed and your browsing behaviour;
 - how you navigate through the site and interact with pages (including fields completed in forms);
 - general location information (including your geographical location when you visit pages); and
 - information about the device you use to visit our website (including your tablet or mobile device) such as device IDs and IP addresses. Your IP address is a number that is automatically assigned to the device that you are using by your Internet Service Provider (ISP).

Not all information requested, collected, and processed by us is personal data as it does not identify you as a specific person. This will include the majority of "user generated content" that you provide to us with the intention of sharing it with other users. Such information is not covered by this Notice.

Users of our website may provide us personal data over platforms that are outside our control – for example through social media or forums. Whilst any information collected by us is governed by this Notice, the platform by which it was communicated will be governed by its own Notice.

How do we collect personal data?

Collection from you

You directly provide us with most of the personal data we collect.

We collect personal data and process such data when you:

- register as a user of our website;
- place an order for any of the products or services listed on our website;
- use our website via your browser's cookies; and
- voluntarily complete a customer survey or provide us with feedback via email.

We may also collect personal data when we communicate with you via email or SMS.

We will try to collect personal data directly from you unless it is unreasonable or impracticable. For this reason, it is important that you keep your contact details up to date.

Collection from other sources

From time to time we collect personal data about you from third parties or organisations. We collect this information from:

- third party websites, applications or platforms containing interactive content supplied by us or that interface with our own websites and applications; and
- other organisations, who jointly with us, provide products or services to you.

How do we use your personal data?

Generally, we use your personal data in the following situations:

- to provide you with the service you asked or applied for and respond to your related requests;
- to consider your application to use the website;
- to administer the service we provide you, which includes answering your questions or complaints;
- to comply with legal and regulatory obligations.

In connection with our legitimate interests in carrying on our business

We may use your information for our legitimate interests (where we have considered these are not overridden by your rights and which you have the right to object to as explained below) in:

- identifying opportunities to improve our service to you and improving our service to you;
- allowing us to run our business and perform administrative and operational tasks (such as training staff, risk management; developing and marketing products and services, undertaking planning, research and statistical analysis; and systems development and testing);
- verifying identity, preventing or investigating any fraud or crime, or any suspected fraud or crime.

Under a legal obligation

We may also use and process your personal data where we are required by applicable laws, regulations or codes that bind us. These include company and tax law and anti-money laundering law which require us to verify your identity.

With your consent

Where required under the GDPR, we will only use your personal data for the purpose for which you have given your valid or explicit consent for, which we will ensure we have obtained before we process your information.

Some information you provide us in connection with your application for or the administering of a service we provide you, may be more sensitive and therefore falls within a special category of personal data. We will collect and process this information only with your explicit consent.

Direct marketing

With your consent where required by law, we may communicate with you (through the preferred communication channel(s) you have selected, which may include by email, telephone, SMS, mail, or any other electronic means including via social networking forums) to tell you more about our services.

If you have provided your consent to receive direct marketing, you can withdraw it at any time without detriment. We will process your request as soon as practicable.

If you no longer wish to receive these emails you may log into your account and update your preferences. Alternatively, click on the “unsubscribe” link in the relevant communication.

Who do we share your personal data with?

We may share your information with other organisations consistent with the purposes for which we use and process your information as described above. This includes with the entities described below.

Sharing at your request

At your request, we will share your personal data with your representative or any person acting on your behalf (for example, financial advisers, lawyers, settlement agents, accountants, executors, administrators, trustees, guardians, brokers or auditors) and your referee such as your employer (to confirm details about you).

Sharing with third parties

We may disclose your personal data to third parties to help us run our website, many of whom are based outside the EEA with the majority based in Australia.

These third parties include:

- Cloud hosting, storage, networking and related providers;
- Payment and banking providers;
- Marketing and analytics providers; and
- Security providers.

We may also disclose your personal data to third-parties for the following purposes:

- to provide the service or product you have requested;
- we receive court orders, subpoenas or other requests for information by law enforcement;
- if otherwise permitted or required by law; or
- for other purposes with your consent.

Sharing outside of Australia

We may need to share some of the information (including credit information) we collect about you from the EEA with organisations both inside and outside Australia, sometimes we may need to ask you before this happens.

We may store your information in cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it is not always practicable to know in which country your information may be accessed or held. If your information is stored in this way, disclosures may occur in countries other than those listed.

If we or our service providers transfer any of your personal data we collect from you out of the EEA, it will only be done with relevant protections in place. We will take steps to ensure that your personal data will be afforded the level of protection required of us under and in accordance with our Privacy Policy and applicable data protection laws and in accordance with current legally recognised data transfer mechanisms, such as where the country has been deemed adequate by the European Commission, or by adopting appropriate EC approved standard contractual clauses.

How do we store your personal data?

We securely store your personal data on computer systems operated by our service providers.

We use a range of physical, electronic and other security measures to protect the security, confidentiality and integrity of the personal data we hold. These include:

- access management controls;
- regular review of our security settings; and
- employees and contractors are subject to confidentiality obligations.

Unfortunately, no data transmission over the internet or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately contact us.

How long do we keep hold of your personal data?

We keep your personal data for as long as it is reasonably necessary to meet the relevant purposes for which we collected your personal data, including for the purpose of satisfying any legal, accounting or reporting requirements.

To determine the appropriate length of time for holding your personal data, we take into account the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use and/or disclosure of your personal data, the purpose(s) for which we process your personal data and whether we can achieve those purposes through other means, together with legal requirements imposed on us.

As a general rule, we generally retain personal data relating to product purchases for up to seven years following the transaction.

Your rights in respect of your personal data

Under the GDPR, you can request to:

- *the right to access* – you have the right to request copies of your personal data. We may charge you a small fee for this service;

- *the right to rectification* – you have the right to request that we correct any information you believe is inaccurate. You also have the right to request us to complete information you believe is incomplete;
- *the right to erasure* – you have the right to request that we erase your personal data, under certain conditions;
- *the right to restrict processing* – you have the right to request that we restrict the processing of your personal data, under certain conditions;
- *the right to object to processing* - you have the right to object to our processing of your personal data, under certain conditions; and
- *the right to data portability* - you have the right to request that we transfer the data that we have collected to another organisation, or directly to you, under certain conditions.

Please note that in respect of all these rights, we reserve the right to refuse your request based on the exemptions set out in the GDPR.

Use of cookies

For more information on how we use cookies please review our Cookies Policy located at www.peiso.com.au/cookies-policy.html.

How to contact us

If you have any questions about this Notice, the personal data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

Email us at: privacy@peiso.com.au

Call us: 0447 967 693

Or write to us at: Level 2
144 Horton Parade
Maroochydore Qld 4558

Attention: Privacy Officer

For the purposes of the GDPR, our Privacy Officer is also our Data Protection Officer (DPO).

How to contact the appropriate authority

If you are in the European Union, you can choose to instead lodge a complaint with your local Data Protection Authority (DPA). The list of DPAs is at http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.