



Digital Experiences Pty Ltd

PRIVACY POLICY

12 May 2014

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DIGITAL EXPERIENCES PTY LTD PRIVACY POLICY

1. About our Privacy Policy

Digital Experiences Pty Ltd (“**we**”, “**us**” or “**our**”) recognises the importance of privacy and is committed to protecting the privacy of individuals when handling their personal information. We handle personal information for purposes relating to our [business] functions and activities including Digital Systems Consulting and Implementation.

Our Privacy Policy outlines how we handle personal information in an open and transparent manner in accordance with the Australian Privacy Principles contained in the Commonwealth *Privacy Act 1988* (“**Privacy Act**”). By providing us with your personal information you consent to us handling it in accordance with our Privacy Policy. If you provide us with any personal information about another individual then we rely upon you to inform him or her of the details contained in our Privacy Policy.

2. Privacy consents by customers/clients under 18

The Privacy Act does not specify an age when individuals can make their own privacy decisions. As a general rule, a customer / client under the age of 18 has capacity to consent when he or she has sufficient understanding and maturity to understand what is being proposed. However, it will be necessary for a parent or guardian to consent on behalf of a customer/client who lacks the maturity or understanding to do so himself or herself.

Where it is not practicable or reasonable for us to assess the capacity of customers/clients on a case-by-case basis then we will presume that customers/clients aged 15 or over have capacity to consent and customers/clients aged under 15 do not to have such capacity unless there is something to suggest otherwise.

3. Why we collect, hold, use and disclose personal information

We collect, hold, use and disclose personal information for purposes relating to our [business] functions and activities. For example, we may collect, hold, use or disclose your personal information for one or more of the following purposes:

- your attendance at or participation in our functions, activities or events
- managing our customer/client relationship with you
- providing you with information about our products, services, functions, activities or events
- evaluating or improving our products, services, functions, activities or events
- marketing or promoting our products, services, functions, activities or events
- carrying out our business functions and activities
- complying with our legal or regulatory obligations

4. What kinds of personal information we collect

The kinds of personal information about you that we may collect and hold include your:

- personal details including name, contact details and personal interests
- business details including your details of the company you work for, contact details, position, years of service, email address and reporting relationships
- product and service information including purchase history

We will not collect any sensitive information about you without your consent unless we are required or authorised by law to collect the information. Sensitive information includes information about a person's health, biometrics, genetics, ethnic background, religious beliefs, religious affiliations, philosophical beliefs, professional memberships, trade memberships, political memberships, political opinions, sexual preferences or criminal record.

If we are not provided with the information about you which we request then it may make it more difficult for us to provide personalised and appropriate solutions for you. It also makes it difficult to provide you with further information about our services that may be highly relevant to you.

5. What kinds of website visitor information we collect

We also collect and hold information about visitors to our website www.digitalexperiences.com.au ("**Website**") using a range of third party tools including cookies and session tools. For example, when you visit our Website we may collect your server address, domain name, operating system, browser type, pages accessed, documents downloaded, previous visits, referring website and visit date and time. We collect and hold this information for the purpose of maintaining and improving our Website and enhancing your experience browsing our Website.

You may set your browser to disable cookies but some parts of our Website may not function properly if cookies are disabled. Our Website does not set tracking cookies if a Do Not Track request is received from your browser.

6. How we collect personal information

We usually collect personal information directly from you in person or when you communicate with us by form, letter, telephone, facsimile, email or other means. For example, we may collect your personal information directly from you when:

- you request us to provide you with our products or services
- you request us to provide you with assistance or support for our products or services
- you attend or participate in our functions, activities or events
- you request us to provide you with information about our products, services, functions, activities or events
- you complete a survey or provide feedback in respect of our products, services, functions, activities or events
- you subscribe to receive news or other information about our products, services, functions, activities or events
- you enter our competitions or promotions

We may also collect your personal information from a third party or publicly available source for the purpose of carrying out our business functions and activities. For example, we may collect your personal information from:

- your authorised representatives in connection with providing you with our products or services or your attendance at or participation in our functions, activities or events
- our service providers that assist us to carry out our business functions and activities including our information technology providers and credit report providers
- government departments and agencies in connection with carrying out our business functions and activities

7. When you will have the option of not identifying yourself

We will give you the option of not identifying yourself or using a pseudonym when dealing with us in relation to a particular matter except where it is impracticable or unlawful for us to do so. For example, you may not need to identify yourself when you request that we provide you with general information about our products, services, functions, activities or events.

8. How we handle unsolicited personal information

If we receive any of your personal information that we have not requested then we will determine within a reasonable time whether or not we could have collected the information. If we determine that we could not have collected the information then we will destroy or de-identify the information as soon as reasonable practicable but only if it is lawful and reasonable to do so.

9. How we disclose personal information

We disclose personal information to third parties for the purpose of carrying out our business functions and activities. For example, we may disclose your personal information to:

- your authorised representatives in connection with providing you with our products or services or your attendance at or participation in our functions, activities or events
- our service providers that assist us to carry out our business functions and activities including our customer support providers, information technology providers, printing and mailing providers, sales and marketing providers, credit report providers, billing providers, debt recovery providers and professional advisers]
- our related companies, agents, partners, affiliates and other trusted entities that assist us to carry out our business functions and activities

- government departments and agencies in connection with carrying out our business functions and activities

These third parties to which we may disclose your personal information may be located in Australia or other countries including the United States, India and Japan

We will not disclose your personal information to any other third parties without your consent except where required or authorised by law. For example, we will not sell, trade or rent your personal information to any third party for marketing purposes without your consent.

10. How we use personal information for direct marketing

We may use your personal information to provide you with news or other information about our products, services, functions, activities or events that may be of interest to you. In each such communication we will describe how you may at any time request not to receive any further such communications from us. We will give effect to your request not to receive any further such communications from us as soon as practicable.

11. How we hold and protect personal information

We hold personal information that we collect in electronic storage facilities including computer servers, desktop and laptop computers, tablets, mobile phones, cameras and other portable data storage devices.

We protect personal information that we hold from misuse, interference and loss, and from unauthorised access, modification or disclosure using both physical and electronic security measures which include secure premises, physical access restrictions, locked cabinets, video surveillance, secure databases, password access, anti-virus software, data encryption and firewalls.

If we hold any personal information that we no longer need for any of our purposes then we will take reasonable steps to destroy or de-identify the information unless we are required by law to retain the information.

12. How you may access and correct your personal information

You have the right to request access to, and correction of, any of your personal information that we hold. You should promptly notify us if you become aware that any of your personal information that we hold is inaccurate or out-of-date.

We will respond within 30 days to a request by you for access to your personal information. We will give you access to your personal information in the manner that you request if it is reasonable and practicable to do so.

We will respond within 30 days to a request by you for the correction of your personal information. If we correct any of your personal information that we have previously disclosed to another organisation which is subject to the Australian Privacy Principles then you may request us to notify that other organisation of the correction. If we decide not to correct any of your personal information then we will give you written reasons for our decision and you may request us to associate with the information a statement apparent to users of the information that it is incorrect.

If you wish to access, correct or update any of your personal information that we hold, please contact our Privacy Officer using the contact details below. You will be required to verify your identity before you will be permitted to access, correct or update any of your personal information that we hold.

13. How to make an enquiry or complaint

If you have an enquiry or complaint about our handling of your personal information, please contact our Privacy Officer using the contact details below. A complaint about our handling of your personal information should first be made in writing to our Privacy Officer setting out details of your complaint. Our Privacy Officer is responsible for dealing with all enquiries and complaints about our handling of personal information and will respond on our behalf within 30 days after receiving an enquiry or complaint.

[If you are not satisfied with our response to your complaint then you may take your complaint to the Office of the Australian Information Commissioner which may be contacted using the following contact details:

Office of the Australian Information Commissioner

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Address: GPO Box 5218, Sydney, NSW 2001]

14. How we update our Privacy Policy

We may update our Privacy Policy from time to time to take into account changes in our information handling practices by publishing an updated version of our Privacy Policy on our Website. You should regularly review the most recent version of our Privacy Policy available on our Website.

15. How to contact us

You may contact our Privacy Officer using the contact details below:

Privacy Officer

Name: John McGiffin

Title: Managing Director

Company: Digital Experiences Pty Ltd

Phone: 1300 544 367

Email: john.mcgiffin@digitalexperiences.com.au

Address: Level 2 Riverside Quay
1 Southbank Boulevard
Southbank
VIC 3006

This Privacy Policy is effective as of 12th May 2014