

Privacy Policy

The provisions set out in this Privacy Policy prescribe the policies of Supermarket Swap Pty Ltd ACN 647 623 470 and any subsidiary (**Supermarket Swap**) and/or its successors and assigns (being “us”, “our” or “Supermarket Swap”) regarding the use, processing and dissemination of personal information submitted by individuals (being “you” or “your”) to Supermarket Swap, whether through or in connection with the Supermarket Swap App, Supermarket Swap Social Media and Supermarket Swap Website and any other format or media pursuant to which Supermarket Swap may collect, retain, publish, distribute, or disseminate any information or communication (**Supermarket Swap Platforms**).

This Privacy Policy applies to all individuals who access or use Supermarket Swap Platforms and to any communications made between an individual and Supermarket Swap through any means including by way of electronic mail or any other forms of public or private communications.

1. Acceptance of policy

- 1.1 Supermarket Swap has created this Privacy Policy in order to demonstrate its firm commitment to your privacy. The following discloses Supermarket Swap’s information gathering and dissemination practices in respect of personal information.
- 1.2 By supplying Supermarket Swap with your personal information in any way, you agree to be bound by this Privacy Policy.
- 1.3 The Supermarket Swap Platforms may include third party content comprising links which will transfer you to the website of a third party, including websites of merchants and advertisers whose respective deals and advertisements are displayed on the Supermarket Swap Platforms. You are not required to click on the links, but if you do, you do so at your own risk. Supermarket Swap is not responsible in any way for the privacy practices of such third parties and you are advised to view and read the privacy statements issued by them to ensure that you understand and agree to the same.

2. Collection of data

- 2.1 We will not collect any information from you which may, or may lead to, the disclosure of your identity as an individual (**Personal Information**) unless you choose to provide us with such information when you communicate with us in any way, including when you submit your Personal Information to us:
 - (a) to purchase any products or services;
 - (b) to request for further information in relation to any products offered or services supplied by Supermarket Swap;
 - (c) to contact Supermarket Swap by way of email, telephone call, letter or through any other means of communication for any reason.
- 2.2 We allow You to create an account and log in to use the Supermarket Platforms through the following Third-party Social Media Services (such as Facebook, Google, Instagram etc) (**Third-party Social Media Services**), if you decide to register through or otherwise grant us access to a Third-Party Social Media Service, We may collect data that is already associated with Your Third-Party Social Media Service's account, such as your name, your email address, your activities or your contact list associated

with that account. You may also have the option of sharing additional information with the Supermarket Swap through Your Third-Party Social Media Service's account. If You choose to provide such information and personal data, during registration or otherwise, You are giving Supermarket permission to use, share, and store it in a manner consistent with this Privacy Policy.

- 2.3 While using Our Application, in order to provide features of the Platforms, we may collect, with your prior permission, information regarding your location. We use this information to provide features of Our Service, to improve and customise Our Service. The information may be uploaded to the Company's servers and/or a Service Provider's server or it may be simply stored on Your device. You can enable or disable access to this information at any time, through your device settings.

3. Use of data

- 3.1 Any Personal Information submitted to us shall be used primarily for the purposes to which they were submitted or required and for administrative purposes.
- 3.2 We may also use your Personal Information for the following additional purposes:
- (a) to understand what your needs and requirements are;
 - (b) to provide personalised content and match the most relevant services for you;
 - (c) to contact you in response to any requests made by you;
 - (d) to deliver targeted advertising to you;
 - (e) to offer you any promotions or special rates;
 - (f) to profile your information preferences, for example, understanding how you use the Supermarket Swap Platforms, reviewing the nature of your communication and/or reviewing your search contents, any Products you purchase or Supermarket Swap Platforms pages you access; and
 - (g) for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our products, services, marketing and your experience.
- 3.3 In the event that we collect Personal Information of a sensitive nature (as defined in the *Privacy Act 1988*), we will not use that information for any purpose without your consent.
- 3.4 We may use third-party providers to monitor and analyze the use of our Platforms.
- 3.5 Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Platform. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. Further information and settings on these are available at: <https://policies.google.com/privacy>
- 3.6 We may provide paid products and/or services within the Platforms. In that case, we may use third-party services for payment processing (e.g. payment processors).

- 3.7 We will not store or collect Your payment card details. That information is provided directly to Our third-party payment processors whose use of Your personal information is governed by their Privacy Policy.
- 3.8 Apple and Google's Privacy Policy can be viewed at: apple.com/legal/privacy/en-ww/ and google.com/policies/privacy/ respectively.

4. **Dissemination of data**

- 4.1 We do not sell or provide Personal Information to any third parties for commercial gain.
- 4.2 We may, however, disclose your Personal Information to our consultants, advisors, service providers and agents (**Authorised Representatives**) to assist us to achieve the purposes described in clause 3.
- 4.3 Additionally, we may be required to disclose your Personal Information in the following circumstances:
- (a) to comply with or enforce a legal process;
 - (b) to receive technical assistance in the development, maintenance or management of our Supermarket Swap Platforms, apps and systems; and
 - (c) to protect the rights, property or personal safety of other persons and/or the public, or to protect our business operations.
- 4.4 If you post or send offensive or objectionable content to us or otherwise engage in any disruptive behaviour towards us, we can use whatever information that is available to us about you to stop such behaviour. This may involve informing relevant third parties such as your employer and law enforcement agencies about the content and your behaviour.

5. **Consent**

- 5.1 By submitting or providing your Personal Information to us, you expressly acknowledge, consent and agree to:
- (a) our use or processing of your Personal Information for the purposes described in clauses 3.1 and 3.2;
 - (b) the disclosure to, or use or processing by, Authorised Representatives for the purposes described in clause 4.2; and
 - (c) the lawful disclosure of your Personal Information pursuant to clause 4.3.
- 5.2 We take reasonable steps to protect Personal Information from misuse, interference or loss, and from unauthorised access, modification or disclosure.
- 5.3 Notwithstanding the aforesaid, you expressly acknowledge and agree that the transmission of information is not completely secure. We are therefore unable to guarantee the security of Personal Information in all circumstances, and in this context the submission or provision of Personal Information is made at your own risk.

6. **Retaining data**

- 6.1 We may be required to retain your Personal Information and all other information submitted to us in order to comply with legal obligations, prevent fraud, collect fees owed (if any), resolve disputes and troubleshoot problems. Such retention is always done within a legal framework.
- 6.2 Subject to the foregoing, we will not retain Personal Information for a period longer than is required in connection with the original purpose of collection.

7. **Information requests**

- 7.1 You have a right to ask for a copy of your Personal Information and to request us to correct any inaccuracies.
- 7.2 Unless the Personal Information relates to an individual for whom you are legally responsible (such as a minor or a person with mental incapacity), you may not provide us with Personal Information about any other person. If you do so, you are representing to us that the other person has appointed you to act for them and has consented to us handling their Personal Information, including sensitive information, in accordance with this Privacy Policy.

8. **Overseas transmission**

- 8.1 It is not our practice to transmit Personal Information overseas or to store it offshore.
- 8.2 If we do so for any reason, however, we will first either:
 - (a) obtain the consent of the individual; or
 - (b) ensure that the information is transmitted to or stored in a country which has data protection laws which are substantially similar to the Australian Privacy Principles and which the individual is able to personally enforce.

9. **Analytics**

- 9.1 If you access and use our Supermarket Swap Platforms, such use and access may be tracked by us through analytics software, including cookies, supplied by third parties for the following purposes:
 - (a) to review the frequency of your usage of the Supermarket Swap Platforms to allow us to tailor and improve on the features and functionality of the Supermarket Swap Platforms; and
 - (b) to compile anonymous statistics patterns of use and access. A third party may collect such data on our behalf to measure the performance and success of the Supermarket Swap Platforms. Information collected is aggregated for reporting purposes, and no personally identifiable information is collected by this service. The use of this service assists us in measuring and improving the structure and ease of use of the Supermarket Swap Platforms.
- 9.2 Analytics software may also track IP addresses. An IP address is a number that can identify an Internet Service Provider, country location and so on. It cannot provide

personal information of a user although to a certain extent, with appropriate software, the user of the IP Address may be de-anonymised.

- 9.3 It is possible that others may download analytics software to your computer or electronic device when you access, visit or use the Supermarket Swap Platforms. We cannot control nor do we have access to any analytics software placed on your computer by such other persons.

10. **Modification of privacy policy**

- 10.1 This Privacy Policy may be modified from time to time as a result of any changes in the law or best practice without notice to you. The most current version of this Privacy Policy as posted on this page shall supersede all previous versions.

- 10.2 It is your responsibility to check regularly to determine whether a new version of the Privacy Policy has been uploaded.

11. **Questions**

- 11.1 If you have any questions about this Privacy Policy, the privacy practice of Supermarket Swap, or your dealings with Supermarket Swap in respect of Personal Information (including any complaint which you may have about our privacy practices), you can email Supermarket Swap at support@supermarketwap.com.au.
- 11.2 If you are dissatisfied with the manner in which we address any privacy complaint, we recommend that you seek independent legal advice or contact the Office of the Australian Information Commissioner direct.