

BARTERCARD.COM PRIVACY POLICY

1. About this Policy

Bartercard Global Pty Ltd (ABN 62 665 448 788) ('we', 'us', 'our', 'Bartercard') understands the importance of, and is committed to, protecting your personal information. Bartercard complies with the Privacy Act 1988 (Privacy Act). Bartercard is bound by the Australian Privacy Principles (APPs) which regulate how Bartercard may collect, use, disclose and store personal information, and how you may access and correct personal information held about you.

Purpose

The purpose of this Privacy Policy is to:

- clearly communicate to you how Bartercard deals with personal information;
- enhance the transparency of Bartercard operations; and
- give you a better and more complete understanding of the sort of personal information that Bartercard holds, and the way Bartercard handles that information.

Changes to this Privacy Policy

Bartercard may change this Privacy Policy from time-to-time. The updated policy will be posted on our website, with the date of the update shown.

Who to contact

If you have any questions, concerns or complaints about this Privacy Policy, or our use of your personal information, please contact the Privacy Officer using the contact details provided below. You can also contact the privacy officer if you believe that the privacy of your personal information has been compromised or is not adequately protected.

Once a complaint has been lodged, the Privacy Officer will respond to you as soon as possible.

If Bartercard is unable to resolve your request, you may refer the complaint to your relevant Privacy Commissioner in your country or in Australia with the Office of the Australian Information Commissioner by telephone: +612 9284 9749 or email: enquiries@oaic.gov.au.

Bartercard Privacy Officer: Tel +61 7 5561 9111

Email: privacy@bartercard.com

2. Information Bartercard collects about you

Bartercard collects information about you that Bartercard reasonably needs for our business functions and activities and which is required by law. Our business functions and activities include:

- providing you with Bartercard products and services – these are described generally on our website, the Members Trading Portal, advertising, and our letter and emails and communications to customers and Members;
- activities in support of those functions including administration, management, marketing, online and mobile marketing, IT, legal, security and customer support;
- activities Bartercard plans for the future including new ways of communicating, new products and services, new business models and new businesses.

Generally, Bartercard collects the following personal information about you:

- your name;
- your contact details including residential or business address, telephone number and email address;
- date of birth; and
- financial information such as bank account and credit card details.

Bartercard may combine your contact details above with other information about you, for example:

- Bartercard collects details related to your Bartercard transactions including products and services, retailer (or service provider), Bartercard franchisee (if applicable), payment details and other details;
- if your business or employer supplies us or Bartercard Members with products or services, or if your business or employer distributes, sells or services our products, Bartercard collects information about your trading with us (for example the products you buy or sell or the services you provide), your trading history and account history;
- if you apply for a position with us, Bartercard collects information to help us decide your application, including your date of birth, tax-file number, work history and similar details;
- if you request information from us (for example about a product or service or a franchise or license) or register a complaint, Bartercard collects information about your request or complaint;
- if you enter a promotion or competition, visit us at an event or enquire about Bartercard, Bartercard may collect your contact details so that Bartercard can follow up on your enquiry or interest by sending you marketing material.

Bartercard records this information (personal information) in our database whilst Bartercard deals with you. Bartercard will remove this information from our database when Bartercard has no further need to keep a record of it, except if Bartercard is required to keep it by law (for example, for tax or for superannuation purposes).

3. How Bartercard collects information about you

How does Bartercard collect personal information?

Bartercard collects personal information directly from you. Bartercard may record your contact details when you call a Bartercard Customer Support Centre, when you fill out an application form, when you purchase a product or service using Bartercard, when you participate in a Trade transaction, when you provide your contact details via web, mobile or email or when you ask us for information or request something from us.

Sometimes Bartercard collects personal information about you from another person or business, or from a publicly available source. For example:

- a retailer or franchisee or licensee may give us your details in relation to a product or service;
- if you are an employee of one of our business partners (e.g. a franchisee, licensee, supplier, repairer or contractor), Bartercard may be given your name and contact details by your employer;
- if you enter a networking event, promotion or competition organised by us, Bartercard may be given your name and contact details by the promoter of the event;
- our service providers may provide us with your personal information from websites, social media sites, mobile, and other technology based sources.

Bartercard uses lawful and fair means to collect your information. Bartercard will collect personal information about you from another person or from a publicly available source only if it is unreasonable or impracticable to collect it directly from you, and Bartercard will take reasonable steps to inform you that Bartercard has collected your personal information. Those reasonable steps may include informing you through this statement.

Unsolicited information

If Bartercard receives personal information about you that Bartercard has not requested, and if Bartercard determines that Bartercard could not have lawfully collected that information under privacy law if Bartercard had requested it, Bartercard will destroy or de-identify the information, if it is lawful and reasonable to do so.

4. Do I have to provide you with my personal information?

You can deal with us anonymously (without giving us your name and contact details) or by using a pseudonym (a name that does not include your real name, for example an email address or a username that you use in an online forum (nickname)).

If you choose to deal with us anonymously or using a nickname, Bartercard can give you general information about our products and services, and you may be able to participate in any online forum Bartercard provides, but there are some things Bartercard cannot do, for example:

If you do not give us your personal information Bartercard cannot give you information about transactions you may have made using Bartercard, the status and balance of your account, other Bartercard Members or deal with a complaint you may have, provide you with a service or deliver a product to you at an address. You cannot attend one of our networking events, or enter into one of our promotions, anonymously or using a nickname.

You can deal with us using a nickname together with your real name and contact details. If you choose to deal with us in this way, Bartercard may collect your personal information together with your nickname. When you identify yourself to us using your nickname only, Bartercard can deal with you only as described above. Bartercard may ask you to provide proof of your identity if you use a nickname.

5. Why Bartercard collects personal information about you (purpose of collection)

Bartercard collects and records personal information about you so that Bartercard can carry out our functions and activities described above. The primary purposes for which Bartercard collects your personal information include:

- so that Bartercard can provide our services to you and to our franchisees, licensees and suppliers;
- so that Bartercard can administer our dealings with you, to provide you with information and to respond to any requests that you may have (for example, so that Bartercard can administer your account, provide you with marketing and sales opportunities or introduce you to other members);
- so that Bartercard can function as a business, for example, Bartercard may collect your personal information for research, marketing or so that Bartercard can offer new products, reconcile transactions, or if you are a supplier so Bartercard can record your dealings with us;
- so that Bartercard can facilitate Trade transactions;
- so that Bartercard can comply with agreements Bartercard has entered into with our suppliers, franchisees and licensees.

Bartercard also collects your personal information for certain secondary purposes that are related to the primary purposes outlined above. Secondary purposes may include so that Bartercard can run our business efficiently, for example, our advisors can provide us with customer research, or so that Bartercard can use technology to automate our business and to understand how our business is performing, to allow us to operate efficiently and to lower costs by outsourcing services (such as collecting or paying money). Other secondary purposes may include so that Bartercard can sell or transfer our business or merge with another business and the sale and transfer of franchises and licenses.

6. Disclosure

Who does Bartercard disclose your personal information to?

Bartercard does not use or disclose your personal information for a purpose other than:

- a purpose set out in this Privacy Policy (primary or secondary purpose above);
- a purpose you would reasonably expect;
- a purpose required or permitted by law;
- a purpose otherwise disclosed to you to which you have consented.

Depending on the circumstances, Bartercard may disclose your personal information to other people including one or more of the following:

- service providers, including management, repairers, contractors, IT, security, legal, accounting, research, credit, credit reporting bodies, marketing, insurers, financial institutions and others;
- our franchisees, affiliate companies and related companies, Bartercard trade exchange companies, Bartercard international licensees and companies that Bartercard may merge with or who may acquire ownership of us;
- government, regulatory and law enforcement authorities, where Bartercard is required to or permitted to by law;
- your employer, if you are an employee of a supplier or franchisee or licensee;
- to prevent or investigate any fraud or crime (or a suspected fraud or crime).

Bartercard may disclose your personal information to third parties including but not limited to:

- partners (being third party businesses that have partnered with Bartercard that offer products and services that may be of interest to you);
- affiliates, related entities, joint venture partners that conduct business with us and related other companies;
- organisations that assist with our product planning, analytics, research and development;
- mailing houses and telemarketing agencies and media organisations that conduct business with us.

Disclosure overseas

Bartercard may disclose your personal information to an overseas service provider, for example a cloud data centre or a customer information call centre. Our overseas service providers may be located in:

- Europe: United Kingdom, Cyprus;
- North America: United States;
- Asia: Singapore, Thailand, Philippines, Hong Kong, India, U.A.E;
- Other: New Zealand.

If it is not practicable or reasonable for us to gain your consent to disclose your personal information to an overseas service provider, Bartercard will take reasonable steps to notify you of the specific countries where Bartercard discloses your personal information. Bartercard will take reasonable steps to ensure that the overseas services provider is bound by privacy and confidentiality obligations.

7. Access to your personal information

You may request access to the personal information that Bartercard holds about you by using the contact details provided above.

Bartercard will deal with your request for such access within a reasonable time. If Bartercard refuses access, Bartercard will provide you with a written notice which sets out the reasons for the refusal and the relevant provisions of the privacy act(s) that we rely on to refuse access.

Bartercard may recover reasonable costs in relation to a request for access to personal information.

Accuracy and correction

Bartercard takes reasonable steps to make sure that the personal information Bartercard collects is accurate, up-to-date and complete. Bartercard takes reasonable steps to make sure that the personal information Bartercard uses or disclose is accurate, up-to-date, complete and relevant. Where Bartercard believes that the personal information Bartercard holds is inaccurate, out-of-date, incomplete, irrelevant or misleading, Bartercard will take reasonable steps to correct that information.

You may request that Bartercard corrects your personal information that Bartercard holds by contacting us by using the contact details provided above. Bartercard will take reasonable steps to correct the information to ensure that it is accurate, up-to-date, complete, relevant and not misleading.

Bartercard will deal with your request to correct your personal information within a reasonable time. If Bartercard does not agree with the corrections you have requested, we are not obliged to alter your personal information accordingly. However, where we refuse to correct any personal information as requested by you, Bartercard will give you a written notice which sets out the reasons for our refusal.

8. Security

Bartercard holds your personal information in paper-based and electronic files. Bartercard will take reasonable steps to ensure that your personal information which is kept in our files is protected from:

- misuse, interference and loss;
- unauthorised access, modification or disclosure.

This means that, in respect of our paper-based files, Bartercard maintains various security systems on our premises, and in respect of electronic files, Bartercard (or our service providers) maintain secure electronic network systems.

When Bartercard no longer requires your personal information (including when Bartercard is no longer required by law to keep records relating to you), Bartercard ensures that it is destroyed or de-identified.

Website

This section explains how we handle personal information collected from our websites (including social media site and mobile site if relevant). If you have any questions or concerns about transmitting your personal information via the internet, you may contact us using the contact details provided above, as there are other ways for you to provide us with your personal information.

Visiting our website

If you access an unsecured part of our websites, that is, a public page that does not require you to log on, Bartercard (or our service providers) will collect information about your visit, such as:

- the time and date of the visit;
- any information or documentation that you download;
- your browser type;
- your IP address.

Cookies

A "cookie" is a small text file which is placed on your internet browser and which Bartercard accesses each time you visit our website. When you visit the secured pages of our website (i.e. pages that you have to provide login details to access) Bartercard uses cookies for security and personalisation purposes. When you visit the unsecured pages of our website (i.e. public pages that you can access without providing login details) Bartercard uses cookies to obtain information about how our website is being used.

You may change the settings on your browser to reject cookies, however doing so will prevent you from access to the secured pages of our website.

Email

When Bartercard receives emails, Bartercard will retain the content of the email and our response to you where Bartercard considers it necessary to do so.

Your email address will only be used or disclosed for the purpose for which it was provided. It will not be added to any mailing lists or used for any other purpose without your consent.

Security

Bartercard makes reasonable efforts to ensure that the most up-to-date security measures are used on our website to protect your personal information. Any data containing personal information which Bartercard transmits via the internet is encrypted. However, Bartercard cannot guarantee that any information transmitted via the internet by us, or you, is entirely secure. You use our website at your own risk.

Links on our website

Our website may contain links to third party websites. Bartercard advises that the terms of this Privacy Policy do not apply to external websites. If you wish to find out how any third parties handle your personal information, you will need to obtain a copy of their privacy policy.

9. Use of your personal information

Bartercard may use your personal information, including your contact details, to provide you with information and updates about products and services, including those of third parties, which Bartercard considers may be of interest to you. Bartercard may use your personal information to improve our products and services and better understand your needs.

Bartercard may contact you by a variety of measures including, but not limited to mail, telephone, email, sms, instant message or other electronic means.

Bartercard's partners may contact you by a variety of measures, including but not limited to, mail, telephone, email, sms, instant message or other means for the purposes of marketing products and services that Bartercard or our partners think will be of interest to you.

By agreeing to allow Bartercard or our partners to contact you about products and services, or by agreeing to this Privacy Policy, you consent to be contacted in accordance with this item 9.

You can let us know at any time if you no longer wish to receive direct marketing offers by contacting us or by following the opt-out instructions provided in the marketing message. Where you contact us directly, we will process your request as soon as practicable. Where you have contacted a partner, the partner will unsubscribe you in accordance with that partner's policies.

We know that you may prefer to receive some types of messages over others, so where possible we will offer you a choice so you can opt out of certain types of marketing but not others. You can update your preferences at any time.

We take steps to ensure that we keep your information for as long as we require it for one or more purposes described in this Policy. When we no longer require your information, we take reasonable steps to ensure that your information is destroyed, de-identified, or rendered inaccessible.

We may from time to time need to disclose personal information to comply with government or regulatory bodies as required or authorised by law.

We may also use your personal information to protect the copyright, trademarks, legal rights, property or safety of Bartercard, its customers and/or third parties.

Information that we collect may from time to time may be stored, processed in or transferred between parties located in countries outside of Australia.

If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our user databases, together with any personal information and non-personal information contained in those databases. This information may be disclosed to a potential purchaser under an agreement to maintain confidentiality.

By providing us with personal information, you consent to the terms of this Privacy Policy and the types of disclosure covered by it. Where we disclose your personal information to third parties, we will request that the third party follow this Privacy Policy regarding handling your personal information.

You may opt out at any time if you no longer wish to receive marketing information. In order to do so, you will need to request that Bartercard no longer sends marketing materials to you or disclose your information to other organisations for marketing purposes. You can make this request by using the contact details provided above, or by "unsubscribing" from email or other marketing messages.

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