

Data and Privacy Policy

Privacy Policy Summary:

How we collect information:

The personal details we collect include your name, address, telephone numbers and information required for servicing your membership. These are sourced either from the membership form you fill in, or over the telephone by one of our Member Service team. No information of a sensitive nature is collected or stored.

How we store your information:

All your personal details are stored in a single, secure database. Access is controlled and limited to MRI employees only.

How accurate is the information we hold?

We make every effort to keep your details accurate and up-to-date. Information is immediately updated if errors or changes are brought to our attention, which is why we recommend that you let us know straight away if you find errors in your personal information. Keep us informed of changes to such personal information as your name, address or telephone number.

Do we disclose your details to anyone else?

No personal information is taken off-site or otherwise disclosed to third parties.

How do you gain access to your personal information?

It is your legal right to know exactly what personal information of yours we hold. Member information is available at all times in writing.

Can I opt out of being contacted?

As part of an ongoing program of communication, we contact you by email to inform you of upcoming events or special product offers, or to gather feedback on our various products and services. If you would prefer not to be contacted in one or more of these programs, you can "opt out" by unticking the email newsletter form here or by contacting our Member Service team. Your preference will then be recorded on our database for future reference.

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Introduction

My Rewards International Ltd, and their subsidiaries (“**MRI Group**”) recognise that your personal information is important to you and that you are concerned with its collection, use and disclosure. MRI Group, like other companies operating in Australia, is bound by the Australian Privacy Principles as set out in the Privacy Act 1988 (Cth) which set clear standards regarding these activities.

This policy contains information about:

- when you can deal with MRI Group anonymously;
- the purposes for which MRI Group collects, holds, uses and discloses personal information;
- the types of personal information that MRI Group collects;
- how MRI Group collects and holds personal information;
- how you may access the personal information that MRI Group holds about you, and how you may seek correction of that personal information; and
- how you may complain about a breach of the Australian Privacy Principles by MRI Group and how MRI Group will deal with such a complaint.

When can you deal with MRI Group anonymously?

Generally, you have the choice to deal with MRI Group anonymously (i.e. without identifying yourself). In certain circumstances however, MRI Group will ask you to provide personal information because it is required by law or MRI Group’ policies to do so, or because it would be impracticable to deal with you anonymously. These circumstances include where you order goods online, where you enter one of our competitions, where you want to claim a bonus product offered with your purchase, where you participate in customer research or store feedback, when you submit a request, enquiry, complaint, when you pre-order goods or where you agree to MRI Group collecting information for future purposes such as receipt retention. MRI Group will also ask you to provide personal information so that it may promote and market its products and services to you; however, you can choose not to do this.

Why does MRI Group collect, hold, use and disclose personal information?

MRI Group collects, holds, uses and discloses personal information for a number of purposes connected with our business operations, which include:

- providing you with products and/or services;
- dealing with requests, enquiries, complaints, allegations, consumer guarantee or warranty claims, and other customer care or brand protection related activities;
- marketing our products and services and providing advice on our products; developing and improving our products and services;
- in connection with our loyalty or reward programmes and our competitions;
- the operation and administration of accounts or subscriptions that you have with us;
- payment processing;

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- carrying out certain checks (for example, for our fraud or theft prevention processes, or if you wish to open an account with us, obtain credit from us or collect goods from us);
- interacting with companies or organisations with whom MRI Group has a business relationship (who you work for, or otherwise represent);
- reconciling payments due to MRI Group from suppliers in relation to goods or services provided to you by those suppliers;
- interacting with suppliers in relation to products supplied by those suppliers, such as product recalls and updates;
- purposes relating to any third party acquisition or potential acquisition of an interest in MRI Group or of its assets;
- complying with our obligations under agreements with third parties (for example our arrangements with consumer finance providers); and
- carrying out any activity in connection with a legal, governmental or regulatory requirement that we have to comply with, or in connection with legal proceedings, crime or fraud prevention, detection or prosecution.

We may also use and disclose your personal information for other purposes, related to those described above, which would be reasonably expected by you.

Documents (including hard copy documents and electronic documents such as emails) which coincidentally contain personal information will also be retained in accordance with MRI Group normal document retention practices for accounting, legal and business purposes.

Generally, you have no obligation to provide any personal information requested by us. However, if you choose not to do so where we require this information, we may not be able to provide you with the goods and services that you want or deal with a request, inquiry or complaint that you have.

What personal information does MRI Group collect?

The kinds of personal information we collect or which we may hold about you may include:

- your name;
- your address;
- your date of birth;
- your telephone number(s);
- your e-mail address;
- payment information;
- transaction information;
- your user name and password;
- details about your earnings (if you are buying products using a finance plan);
- information contained on identification documents (such as driving licences) and, in some specific cases, copies of such identification documents, where we require these to verify your identity;
- information on how you use our products and services;

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- your Internet Protocol ("IP") address, server address, domain name and information on your browsing activity when visiting one of our websites;
- your user name for social networking sites that you use, to refer to, or in conjunction with, our goods and services;
- personal preferences regarding products and services; and
- CCTV images of you whilst you are in one of our stores.

How does MRI Group collect and hold your personal information?

We collect personal information in a number of ways including:

- When you or your employer provides us the information for delivering this service
- when you order goods or services from us (either online, in-store or over the telephone);
- when you collect goods that you have ordered from us;
- when you set up an account with us;
- when you pay for goods on a trading account by cheque;
- when you subscribe to our catalogues or mailing lists;
- when you join any of our loyalty or reward programs;
- when you enter competitions or promotions that we run;
- when you provide us your details for customer care purposes;
- when you browse one of our websites (further information is set out later in this Privacy Policy);
- when you submit an enquiry using one of our websites;
- when you complete surveys or provide online feedback or product reviews;
- when you publicly comment about us on social media sites (for example so that we can answer questions about our products); and

Generally, MRI Group will collect your personal information directly from you. However, MRI Group also holds information, collected incidentally, concerning individuals who work for companies or organisations that have a business relationship with MRI Group. Additionally, if you apply for a job with MRI Group, we may collect personal information about you from any third parties that you nominate as your referees in your application.

MRI Group holds personal information in a number of ways, including:

- as part of customer records and other electronic documents in which personal information is contained which are stored on our information technology systems and servers operated by third parties who provide services to us in connection with our business; and
- by securely storing hard copy documents in which personal information is contained, at our various premises and/or using third party document management and archiving services.

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Marketing

We may use your personal information that we have collected to promote and market products and services to you, including through methods such as email, post, MMS, SMS, social media and via telephone. We will not use your personal information for marketing purposes where you have opted out of receiving such communications.

When we send you marketing communications we may provide you a particular way to opt-out such as via SMS. Otherwise, you may opt-out of receiving marketing communications by sending a written request to info@myrewards.com.au

Please note that when you create an online account with us or make a purchase online your details will be added to our marketing database to receive information relating to new products. You may also choose to receive such information by subscribing to our marketing database via one of our websites. To opt-out of receiving MRI Group marketing materials from our marketing database, you will need to unsubscribe from our database. To do this, simply select the "unsubscribe" option in one of the emails that you receive from us.

Sharing your personal information

- MRI Group may disclose or receive personal information or documents about you, including to/from:
- organisations that provide services to us in connection with our business, including customer support, payment processing, administration, archival, data storage, hosting, research, mail and delivery, installation, distribution, logistics, marketing, auditing, share registry, consulting, financial, legal and public relations advisory, banking, debt collection, security or technical services and the operation of MRI Group websites. In some cases these service providers may collect your personal information on our behalf;
- law enforcement agencies to assist in the prevention, investigation and prosecution of criminal activities;
- parties involved in any third-party acquisition or potential acquisition of an interest in MRI Group or its assets;
- our insurers and insurance brokers;
- if goods you purchase from MRI Group are subject to a product recall, the manufacturer or distributor of those goods; and
- other third parties where you have specifically consented to the disclosure of information to these third parties.

Some examples of organisations where we may disclose your information: Amazon Web Services, PayPal, Australia Post, Teamdesk, Commonwealth Bank of Australia, 121 Group.

Disclosure of personal information to overseas recipients

MRI Group is likely to disclose the personal information that it collects and holds about you to third parties who are not in Australia (such as third parties who are located in the United States of America, Singapore, the United Kingdom, Holland, India and New Zealand). Some of the jurisdictions in which these third parties are located may have less protective privacy and data protections laws than Australia.

Personal information collected on behalf of other parties

MRI Group may collect information about you on behalf of third parties.

In these cases the documentation that you sign will set out (expressly or by reference to third party privacy policies) how the personal information that you provide will be used by these third parties, and the privacy policies of the third parties will apply. MRI Group may also receive personal information about you from these third parties where necessary in connection with the provision of goods or services by MRI Group.

How we deal with your personal information, if you apply for a job with us?

If you apply for a job with us, you will be required to provide us with certain personal information, including your name, employment and educational background, in relation to your job application.

We will hold, use and disclose that information solely for the purpose of considering your application. In particular, in considering your application, it may be necessary for us to disclose some of that information to third parties to verify the accuracy of that information. We will disclose only such information as is necessary in the circumstances. In considering your application, we may also collect personal information about you from any third parties that you nominate as your referees in your application.

Security of your personal information

We will take reasonable steps to ensure that the personal information that we hold is stored in a secure environment protected from misuse, interference and loss and from any unauthorised access, modification or disclosure.

How to access, correct and update your personal information?

Upon your request, MRI Group will provide you with access to your personal information that we hold (except in certain circumstances set out in the Privacy Act 1988 (Cth)). MRI Group will require proof of your identify before providing information to you.

You may also ask us to correct the personal information that MRI Group holds about you. If you do so and we are satisfied that, having regard to a purpose for which the information is held, the information is inaccurate, out-of-date, incomplete, irrelevant or misleading, MRI Group will take such steps as are reasonable in the circumstances to correct your personal information to ensure that, having regarding to the purpose for which it is held, the information is accurate, up-to-date, complete, relevant and not misleading.

To request access to the personal information that MRI Group holds about you, or to update or correct that personal information, please send a written request info@myrewards.com.au

In addition:

- if you are a subscriber to our marketing database you can also update your details via the “unsubscribe” option in one of the emails that you receive from us;
- if you subscribe to one of our services (such as tech support) you can also update your details via that service.

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How to make a complaint?

If you are concerned that the way MRI Group collects, holds, uses or discloses your personal information may be in breach of the Australian Privacy Principles, please send written details of your complaint to info@myrewards.com.au

How MRI Group will handle complaints regarding personal information?

After receiving a complaint, we will consider whether we need any further information from you to properly consider and investigate the complaint, and may request such information from you. We will then:

- conduct internal discussions with the relevant business units involved in the collection, holding, use or disclosure of the personal information which is the subject of your complaint, and evaluate whether we believe that such collection, holding, use or disclosure of your personal information was in breach of the Australian Privacy Principles; and
- notify you of the results of our investigation of your complaint.

If the conclusion of our investigation is that our collection, holding, use or disclosure of your personal information was in breach of the Australian Privacy Principles, we will take steps to remedy the breach as soon as reasonably practicable.

We will endeavour to notify you of the results of our investigation of your complaint within 30 days of receiving your complaint. However, if your complaint involves complex matters or requires extensive investigation and consultation, it may not be possible to respond within this timeframe.

If you are not satisfied with our response to your complaint you are entitled under the Privacy Act 1988 (Cth) to make a complaint to the Office of the Australian Information Commissioner. Information about how to make a complaint is available from the Office of the Australian Information Commissioner's website (www.oaic.gov.au).**Data and Privacy Policy**

Additional information for users of our websites

If you visit any MRI Group websites (the "Websites") to read, browse or download information, our system may record information such as the date and time of your visit to the Website, the pages accessed and any information downloaded. This information is used (i) for statistical and reporting purposes; (ii) for website administration, security and maintenance purposes; and (iii) to direct you to material on our Websites that we believe will be of interest to you.

Like many websites, our Website may use "cookies" from time to time. Cookies are small text files that we transfer to your computer's hard drive through your web browser to enable our systems to recognise your browser and your log-in status. Cookies may also be used to record non-personal information such as the date, time or duration of your visit, or the pages accessed, for website administration, statistical and maintenance purposes. Any such information will be aggregated and not linked to particular individuals. The default settings of browsers like Internet Explorer usually allow cookies, but users can easily erase cookies from their hard-drive, block all cookies, or receive a warning before a cookie is stored. Please note that some parts of the Website may not function fully for users that disallow cookies.

Our Website also uses tags, which are tiny bits of website code that allow us to measure traffic and visitor behaviour, and to understand the impact of online advertising, use remarketing and audience targeting. These tags do not collect any personally identifiable information.

While we take great care to protect your personal information on our Website and use state-of-the-art data transmission encryption, unfortunately no data transmission over the Internet can be guaranteed to be 100% secure. Accordingly, we cannot ensure or warrant the security of any information that you send to us or receive from us online. This is particularly true for information you send to us via email. We have no way of protecting that information until it reaches us. Once we receive your transmission, we use our best efforts to ensure its security in our possession.

The Websites may contain links/ plug-ins to other sites. We are not responsible for content of, or the privacy practices or policies of, those sites.

Exemptions

MRI Group sometimes handles personal information relying on exemptions under the Privacy Act 1988 (Cth), for example in relation to: (i) employee records; (ii) related bodies corporate; (iii) provision of services to State or Territory authorities; and (iv) operations outside Australia relating to personal information of non-Australians.

Any permitted handling of personal information under such exemptions will take priority over this Privacy Policy to the extent of any inconsistency.

Privacy Queries

If you have any queries or concerns, further information can be obtained by contacting our Privacy Officer by email info@myrewards.com.au or by post to The Privacy Officer, My Rewards International Ltd, G02 181 St Kilda Road, St Kilda 3183

Intellectual Property Rights

1. Ownership of Pre-existing IP

Each party (or its licensors) will retain ownership of all Intellectual Property Rights subsisting in any material it provides or makes available to the other party under or in connection with this agreement which is not Developed IP ("Pre-existing IP").

2. Licence to use Pre-existing IP

- (a) Subject to anything to the contrary specified in a Module, each party grants to the other party a non-exclusive, royalty free licence to use, reproduce, modify and adapt its Pre-existing IP only to the extent necessary for the purpose of:
 - (i) performing its obligations or exercising its rights under this agreement; and
 - (ii) in the case of [[client]], receiving the Services (including through use of the Deliverables) and exercising its rights in the Developed IP.
- (b) The licence granted to the Service Provider is only granted for the term and will immediately come to an end if this agreement expires or is terminated for any reason.
- (c) The licence granted to [[client]] under clause 2(a) includes a right to sub-license the relevant licence rights to any [[client subsidiary]] or any agent, contractor, consultant, supplier or customer of [[client]] or

any [[client subsidiary]] solely for the purpose of enabling [[client]] to enjoy the benefit of this agreement for the term of the Agreement.

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3. Developed IP

- (a) Ownership of all Intellectual Property Rights created or developed by or on behalf of the Service Provider to meet [[clients]] requirements under this agreement or otherwise in the course of providing the Services (“**Developed IP**”) vests in My Rewards International from its creation. The client absolutely and unconditionally assigns all of its right, title and interest in the Developed IP to My Rewards International.
- (b) For any Developed IP created by a third party,
 - (i) Should the costs of Developed IP are paid by the service provider, the client must ensure that the relevant third party absolutely and unconditionally assigns all of its right, title and interest in the Developed IP to My Rewards International Ltd.
 - (ii) Should the costs of the Developed IP are paid by the [[client]], the service provider must ensure that the relevant third party absolutely and unconditionally assigns all of its right, title and interest in the Developed IP to [[client]].
- (c) The service provider grants to the client, a non-exclusive, royalty free licence to use, reproduce, modify and adapt the Developed IP only to the extent necessary for the [[client]] to access and enjoy the Services and perform its other obligations under this agreement. The licence granted to the [[client]] under this clause is only granted for the term and will immediately come to an end if this agreement expires or is terminated for any reason.

4. Moral rights

To the extent permitted by applicable law, the Service Provider:

- (a) unconditionally and irrevocably consents, and will take reasonable steps to obtain all other necessary unconditional and irrevocable written consents (including from the Personnel), to any act or omission by or on behalf of [[client]] that would otherwise infringe any Moral Rights in any work which is included in a Deliverable, whether occurring before or after a consent is given; and
- (b) will not institute, maintain or support any claim or proceeding for infringement by or on behalf of [[client]] of Moral Rights in any work included in a Deliverable