

# CleverDux Privacy Policy

## Purpose of Policy

This Privacy Policy applies to the collection, use, disclosure and handling of personal information by CleverDux Pty Ltd. CleverDux is committed to protecting the privacy of individuals and is bound by the Australian Privacy Principles set out in the Privacy Act 1988 (Commonwealth) (the "Act"). We will only collect, use or disclose personal information in accordance with the Act and this Privacy Policy.

CleverDux owns and operates the site [www.cleverdux.com](http://www.cleverdux.com) (the "Site"); an online platform where users can view and purchase items created by CleverDux.

By providing personal information to us when applying for a free 'See & Save' wristband, sending enquiries or purchasing a product from the site, you expressly agree to this Privacy Policy.

## What is personal information?

When used in this policy, the term "personal information" has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. This may include (but is not limited to) your name, age, gender, medical information, postcode, contact details (including phone numbers and email addresses?), possibly financial information, including your credit card, direct debit or PayPal account information plus information you provide to us about another family member. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

## What personal information do we collect and hold?

We may collect the following types of personal information:

- name;
- mailing or street address;
- email address;
- telephone number;
- family members information
- information related to family members under 18 years old
- medical information about yourself or other family members
- other medical information provided by you

## What types of information do we collect?

### *Personal Information*

The type of personal information that we collect and hold about you and your child/children depends on the type of dealings that you have with us.

For example, in order to process a request, enquiry or order from you, we may need to know all or some of the following: your full name, address, telephone number, e-mail address, your current location, school your child/ren attend, medical conditions of family members and, in the case of purchasing a product, a method of payment.

In terms of the health information we collect about you or your children, willfully provided by you when answering some basic health questions to receive a free wristband, we assume ownership of these details indefinitely to design future products and to create better policy and practice for Australian children suffering, but not limited to, asthma, allergies, anaphylaxis, epilepsy and diabetes.

When you visit the Site, some of the information that is collected about your visit is not personal information, because it does not reveal your identity. We use this information to help us improve our services. We may aggregate this information

for our own statistical purposes. Provided that it remains anonymous, we may disclose that aggregated information to third parties for marketing or other business related purposes.

### *Cookies*

A "cookie" is a small file placed on your hard drive by certain of our web pages. We or third parties under contract with us may use cookies to help us analyze our web page flow, customize our services, content and advertising, measure promotional effectiveness and promote trust and safety. Cookies are commonly used at most major transactional websites in much the same way we use them here at our Site.

You may delete and block all cookies from this site, but parts of the site will not work. We want to be open about our cookie use. Even if you are only browsing the Site certain information (including computer and connection information, browser type and version, operating system and platform details and the time of accessing the Site) is automatically collected about you. This information will be collected every time you access the Site and it will be used for the purposes outlined in this Privacy Policy.

You can reduce the information cookies collect from your device. An easy way of doing this is often to change the settings in your browser. If you do that you should know that (a) your use of the Site may be adversely affected (and possibly entirely prevented), (b) your experience of this and other sites that use cookies to enhance or personalize your experience may be adversely affected, and (c) you may not be presented with advertising that reflects the way that you use our, and other, sites. You find out how to make these changes to your browser at this site: [www.allaboutcookies.org/manage-cookies/](http://www.allaboutcookies.org/manage-cookies/). Unless you have adjusted your browser setting so that it will refuse cookies, our system will send cookies as soon as you visit our site. By using the site you consent to this, unless you change your browser settings.

### **How do we collect personal information?**

#### *Methods of collection*

We will collect personal information by lawful and fair means as required by the Privacy Act. We will also collect personal information directly from you where this is reasonable and practicable.

We collect personal information in a number of ways, including:

- Directly from you in person, by email, over the telephone, through written communications or by you completing forms or submitting information on the Site;
- Through our Site, for example if you purchase a product or fill in information to receive a free product.
- From third parties,
  - including: direct marketing database providers,
  - public sources, such as telephone directories,
  - membership lists of business, professional and trade associations,
- From our own records of your use of our services.

### **Why do we collect, hold, use and disclose your personal information?**

The main purposes for which we collect, hold, use and disclose personal information are:

- To identify you and verify your identity;
- To help improve education, policies and best practice around those medical conditions spoken about on our site.
- To communicate with you about our services;
- To contact you from time to time with critical user or service updates;

- To customize, measure and improve our services, content and advertising;
- To prevent activity we determine to be potentially illegal, unlawful or harmful and to enforce our Privacy Policy and/or our Terms or any other purpose referenced herein or therein. We collate statistics about site traffic, sales and other commercial information which we pass onto third parties to assist us in improving the services we provide to you. We also use demographic information to tailor the Site and we share that information with third parties so that they can build up a better picture of our customer base and general consumer trends; and
- For any other purposes that you have consented to.

Where we have your express or implied consent, or where we are otherwise permitted by law, we may contact you with information about our products and the services on the Site. You can opt out of receiving these communications at any time, by either contacting us, or by using the unsubscribe facility that we include in our commercial electronic messages (i.e., email) to opt out of receiving those messages.

### **To whom do we disclose your personal information?**

We may disclose your personal data to enforce our policies, or where we are permitted to do so by applicable law, such as in response to a valid, legally-compliant request by a law enforcement or governmental authority, or in connection with actual or proposed litigation, or to protect our property, people and other rights or interests.

We may also share your personal data with:

- Our partners who's morals and intentions match with ours
- Our contracted services providers, including:
  - Information technology service providers (including cloud services providers);
  - Marketing, communications and research agencies;
  - Mailing houses, postal, freight and courier service providers;
  - Printers and distributors of direct marketing materials;
  - External business advisers (such as recruitment advisers, auditors and lawyers).

In the case of these contracted service providers, we may disclose personal information to the service provider and the service provider may in turn provide us with personal information collected from you in the course of providing the relevant products or services.

We may de-identify and aggregate the personal information of you and others for our own statistical purposes. Provided that it remains permanently de-identified, we may disclose that aggregated information to third parties or publish it for marketing or research purposes.

In the event that CleverDux is sold, or some of its assets transferred to a third party, your personal information, as a valuable asset, may also be transferred. Potential purchasers and their advisors may have access to data as part of the sale process. However, use of your personal information will remain subject to this Privacy Policy. Similarly, your personal information may be passed on to a successor in interest in the unlikely event of a liquidation, bankruptcy or administration. Our customer database could be sold separately from the rest of the business, in whole or in a number of parts. It could be that the purchaser's business is different from ours too.

### **Data quality and security**

We hold personal information in a number of ways, including in electronic databases, email contact lists, and in paper files held in secure premises. We take reasonable steps to:

- Make sure that the personal information that we collect, use and disclose is accurate, up to date and complete and (in the case of use and disclosure) relevant;

- Protect the personal information that we hold from misuse, interference and loss and from unauthorised access, modification or disclosure;
- Destroy or permanently de-identify personal information that is no longer needed for any purpose that is permitted under the Act.

### *Website security*

While CleverDux strives to protect the personal information and privacy of users of the Site, we cannot guarantee the security of any information that you disclose online and you disclose that information at your own risk. If you are concerned about sending your information over the internet, you can contact us by telephone or post.

While no system is completely secure, we believe the measures implemented by the Site reduce our vulnerability to security problems to a level appropriate to the type of data involved. We have security measures in place to protect our user database and access to this database is restricted internally. However, it remains each user's responsibility:

- To protect against unauthorized access to your use of the Site;
- To ensure no-one else uses the Site while the user's machine is "logged on" to the Site (including by logging on to your machine through a mobile, Wi-Fi or share access connection you are using);
- To log off or exit from Site when not using it; and
- Where relevant, to keep your password or other access information secret. Your password and log in details are personal to you and should not be given to anyone else or used to provide shared access for example over a network; and
- To maintain good internet security. For example if your email account or Facebook account is compromised this could allow access to your account with us if you have given us those details and/or permitted access through those accounts. If your email account is compromised it could be used to ask us to reset a password and gain access to your account with us. You should keep all of your account details secure. If you think that any of your accounts has been compromised you should change your account credentials with us, and in particular make sure any compromised account does not allow access to your account with us. You should also tell us as soon as you can so that we can try to help you keep your account secure and if necessary warn anyone else who could be affected.

If you have asked us to share data with third party sites, however (such as Facebook) their servers may not be secure. Credit card information is generally stored by our credit card processing partners and we ask them to keep that data secure. We also use third parties to help us optimize our website flow, content and advertising (see below).

Note that, despite the measures taken by us and the third parties we engage, the internet is not secure, and others may nevertheless unlawfully intercept or access private transmissions or data. As such, except to the extent liability cannot be excluded due to the operation of statute, CleverDux excludes all liability (including in negligence) for the consequences of any unauthorised access to your personal information. Please notify us immediately if you become aware of any breach of security.

### *Phishing or False emails*

If you receive an unsolicited email that appears to be from us that requests personal information (such as your credit card, login, or password), or that asks you to verify or confirm your account or other personal information by clicking on a link, that email was likely to have been sent by someone trying to unlawfully obtain your information, sometimes referred to as a "phisher" or "spoofer." We do not ask for this type of information in an email. Do not provide the information or click on the link. Please contact us at [info@cleverdux.com](mailto:info@cleverdux.com)

## **Access and correction of your personal information**

You have a right to request access to or correction of your personal information held by us. If you wish to access, correct or update any personal information we may hold about you, please contact us as set out below.

## **Complaints process**

If you have any questions or concerns about our collection, use or disclosure of personal information, or if you believe that we have not complied with this Privacy Policy or the Act, please contact us as set out below. The Privacy Officer will investigate the complaint and determine whether a breach has occurred and what action, if any, to take. When contacting us, please provide as much detail as possible in relation to the query, issue or complaint.

We will take any privacy complaint seriously. We will aim to resolve any such complaint in a timely and efficient manner, and our target response time is 30 days. We request that you cooperate with us during this process and provide us with relevant information we may require.

## **Contact Us**

Please contact our Privacy Officer if you have any queries about the personal information that we hold about you or the way we handle that personal information:

CleverDux Privacy Officer  
2 Hansford Parade  
Bilgola Plateau, NSW, 2107  
info@cleverdux.com

## **Changes to this Policy**

We may amend this Privacy Policy from time to time to reflect regulatory requirements; advances in technology, Site updates and changes in our information collection and disclosure practices.

Any new policy will automatically be effective when it is published on the Site and a copy may be obtained from our Privacy Officer. You should therefore return here regularly to view our most up to date Privacy Policy. You should also print a copy for your records.