

Dubber Pty Ltd (ACN 089 145 424)

Privacy Policy

Dubber Pty Ltd (**Dubber** or **we**) is committed to protecting your privacy and to complying with the Australian Privacy Principles under the *Privacy Act 1988* (Cth), any amending acts or regulations and other privacy laws which govern the way in which organisations such as Dubber hold, use and disclose personal information (the **Privacy Laws**).

This Privacy Policy informs you as to:

- (a) the kinds of information Dubber may collect and how that information is held;
- (b) how Dubber collects and holds Personal Information;
- (c) the purposes for which we collect, hold, use and disclose Personal Information;
- (d) whether we disclose it to anyone;
- (e) how you can access the Personal Information Dubber holds and your ability to correct this information; and
- (f) the way you can complain about a breach of privacy and how that complaint will be handled.

Consent

By supplying information to us through use of the Dubber website or via registrations made in hard copy or electronically in order to receive information or products and services from us, including via email, you consent to the terms of our current Privacy Policy. If you do not agree with any term in this policy, please do not supply your information to us.

Collection

Dubber may collect information when you communicate with us by phone, email, in writing or in person, or through your use of the Dubber website.

We will usually collect your Personal Information directly from you, however sometimes we may need to collect information about you from third parties, such as:

- (a) other service providers;
- (b) publicly available sources of information, including databases lawfully maintained by government departments or private companies;
- (c) from our records of how you use our products and services;
- (d) our related entities;
- (e) where legally authorised or required to do so.

We will only collect information from third parties where:

- (a) you have consented to its collection;
- (b) collection of the information is necessary to enable provision of our products and services;
- (c) collection is reasonably necessary to enable us to carry out our business; or
- (d) in other circumstances where we are legally permitted to do so.

What is Personal Information?

When we refer in this Privacy Policy to 'Personal Information', we mean personally identifiable information such as your name, mailing address, email address or telephone number and any other information necessary to enable us to efficiently and effectively deliver our products and services to you (including information about how you use our products and services).

When you provide us with Personal Information, you are authorising us to use that information in accordance with the terms of this Privacy Policy.

How we use Personal Information

Your Personal Information will be used by us for the express purpose for which it was collected (e.g. to respond to your enquiry, to send you information or to provide you with requested services or products) (**primary purpose**) unless:

- (a) there is another purpose (**secondary purpose**) and that secondary purpose is related directly to the primary purpose, and you would reasonably expect, or Dubber has informed you, that the information will be used for that secondary purpose;
- (b) you have given your consent for your Personal Information to be used for a secondary purpose; or
- (c) Dubber is required or authorised by law to use your Personal Information for a secondary purpose.

For example, in accordance with this Privacy Policy Dubber may use your Personal Information in order to:

- (a) verify your identity or conduct appropriate checks for credit worthiness or fraud;
- (b) understand your needs in order to provide you with the products and services you require;
- (c) administer and manage our services, including billing and debt collection;
- (d) distribute information, newsletters, publications and other communication via various mediums to keep you informed;
- (e) research and develop new product offerings and services;
- (f) manage and conduct our business including assessing insurance requirements or conducting audits, quality assurance programs and training personnel; d
- (g) effectively communicate with third parties; and
- (h) as required or authorised by law.

When may we disclose the Personal Information?

Dubber will confine its use of your Personal Information to the primary purpose for which it was collected or a related secondary purpose.

We may provide your Personal Information to:

- (a) your authorised representative or your legal advisers;
- (b) credit reporting and fraud checking agencies;
- (c) credit providers (for credit related purposes such as credit worthiness, credit provision, financing and credit ratings);
- (d) our professional and business advisers (including lawyers and accountants);
- (e) government and regulatory authorities and other organisations as required or authorised by law);
- (f) Dubber's related entities;
- (g) Dubber's insurers (for the purposes of obtaining adequate insurance or in relation to any claim or potential claim)
- (h) third parties involved in the provision of products and services to you, such as IT providers, marketing and communications agencies, call centres, printers and mailing houses;
- (i) anyone authorised by you to receive your Personal Information; or
- (j) anyone to whom TMA is required or authorised by law to disclose your Personal Information.

[In some cases the organisations to which we may disclose your details may be based outside Australia. For example, ...]

Where your details are provided to any other party in accordance with the express purpose, we will require them to be kept safe and secure and used only for the intended purpose.

You may withdraw your consent to receiving marketing materials from us by contacting Dubber by email at info@dubber.net or by contacting us in writing at Level 5, 2 Russell Street, Melbourne Victoria, Australia 3000.

What happens if you don't provide the requested Personal Information?

Where possible and practical, you will have the option to deal with Dubber on an anonymous basis or by using a pseudonym. However, in some circumstances, if we are unable to collect Personal Information from or about you or if the Personal Information provided is incomplete or inaccurate, Dubber may not be able to do business with you, including providing the products or services you are seeking or provide support or assist you with your queries.

Security of Personal Information

We will take all reasonable steps to ensure that all Personal Information we collect, use or disclose is stored in a secure environment in either hard copy or electronic form and is accessed only by authorised persons. The storage facilities may be owned and operated by us or by our service providers.

Dubber seeks to ensure the security, privacy and integrity of Personal Information and will take all reasonable steps to protect your Personal Information from misuse, interference, loss, modification, unauthorised access and disclosure. We review and update (where required) security measures based on current technologies.

While we do all we can to protect your Personal Information, you should be aware of the various information security risks that exist today and take steps to protect your Personal Information where it is being shared with Dubber via the internet, including by:

- (a) ensuring others cannot access your Personal Information or email;
- (b) not providing your user name and password to third parties.

Cookies

To facilitate the use of the Dubber website, cookies are used. Cookies are small units of data that your browser places on the hard drive of your computer. Cookies assist your browser to navigate a website and do not identify individual users or collect personally identifiable information, however they do identify your ISP and browser type.

We use cookies to better understand the manner in which our website is used and to improve a user's experience of a website.

Cookies allow us to know whether you have already visited our website or are a first time user. They remember the type of browser you use and preferences such as language and region when you revisit the website. [Some cookies we use are "session cookies" and only last for the duration of your visit to the website, others are "persistent cookies" which are stored for longer.]

If you wish, you may choose to reject or block cookies by changing your browser settings to erase all cookies from your hard drive, block cookies or receive a warning before a cookie is stored. You should note that if you do so, you will still be able to visit our website however some functions (including features of our on-line services) may not work correctly.

How to access, correct or update your information

We will take all reasonable steps to ensure that all information we collect, use or disclose is accurate, complete and up-to-date. Please contact us if your details change or if you believe the information we have about you is not accurate or complete.

We will provide you with reasonable opportunity to access your Personal Information and have it corrected or updated. There is no fee to apply for access, but we may charge you our reasonable expenses for granting access. We will require you to verify your identity prior to being granted access.

How long do we keep Personal Information?

We will take reasonable steps to destroy or permanently de-identify Personal Information that is no longer needed for any purpose that is permitted by the *Privacy Act 1988* (Cth).

Resolving concerns

If you believe that the privacy of your Personal Information has been compromised, you are entitled to complain and we will endeavour to satisfactorily resolve the issue. Complaints can be made by contacting Dubber by email at info@dubber.net or by contacting us in writing at Level 5, 2 Russell Street, Melbourne Victoria, Australia 3000.

. We will respond to complaints as soon as possible.

To the maximum extent permissible by law, Dubber expressly disclaims any liability for a breach of this policy. By providing Dubber with Personal Information, an individual acknowledges that any damage caused to that individual or any other individual by the disclosure of that information shall be limited to the amount recoverable under applicable legislation and otherwise not be recoverable from Dubber or any of its related bodies.

Changes

We reserve the right to amend or edit this Privacy Policy from time to time at our discretion, such as to reflect changes in Dubber's business or practices. We may change the Privacy Policy at any time by posting the changed Privacy Policy on the Dubber website, including posting a notice on the Dubber web site homepage indicating a change has been made.

Contact us

Please write to us at info@dubber.net or contact us in writing at Level 5, 2 Russell Street, Melbourne Victoria, Australia 3000.

if you:

- (a) have any questions, comments or concerns about this Privacy Policy;
- (b) would like Dubber to update or correct your Personal Information in its records; or
- (c) wish to report a breach of the Privacy Policy.

You can also lodge a complaint regarding Dubber's information handling practices or a breach of the Privacy Policy with the Office of the Australian Information Commissioner (www.oaic.gov.au).