

## Privacy Policy

**iPantry TRADING PTY LTD ACN 640 742 990 (“iPantry”)** respects that your privacy is important to you. We value your trust in us and we are committed to protecting your privacy.

This Privacy Policy sets out how iPantry collects, maintains, uses and discloses personal information provided by you and applies to all of the products, services and websites offered by iPantry or its subsidiaries or affiliated companies.

If you have any questions about this Privacy Policy, please feel free to us at [info@ipantry.com.au](mailto:info@ipantry.com.au)

### 1. Collection and Use of Data

We may collect the following types of information:

- (a) **Information you provide** – When you sign up for an iPantry account on our website or buy any product or service from iPantry, we ask you for personal information, including credit card information. We may combine the information you submit under your account with information from other iPantry services or third parties in order to provide you with a better experience and to improve the quality of our services including marketing our products and services. For certain services, we may give you the opportunity to opt out of combining such information. If you are unwilling to provide information requested by us, please contact us at [info@ipantry.com.au](mailto:info@ipantry.com.au) and we will discuss your concerns.
- (b) **Cookies** – When you visit iPantry, we send one or more cookies to your computer or other device. We use cookies to improve the quality of our service, including for storing user preferences, improving search results and ad selection, and tracking user trends, such as how people search. iPantry also uses cookies in its advertising services to help advertisers and publishers serve and manage ads across the web and on iPantry services.
- (c) **Log information** – When you access iPantry services via an internet browser, application or other client our servers automatically record certain information. These server logs may include information such as your web request, your interaction with a service, Internet Protocol address, browser type, browser language, the date and time of your request and one or more cookies that may uniquely identify your browser or your account.
- (d) **User communications** – When you send email or other communications to iPantry, we may retain those communications in order to process your inquiries, respond to

your requests and improve our services. When you send and receive SMS messages to or from one of our services that provides SMS functionality, where applicable, we may collect and maintain information associated with those messages, such as the phone number, the wireless carrier associated with the phone number, the content of the message, and the date and time of the transaction. We may use your email address to communicate with you about our services.

- (e) **iPantry communications** – iPantry may send you service announcements, administrative messages, newsletters or other messages from time to time, using your personal information.
- (f) **Affiliated iPantry services on other sites** – We offer some of our services on or through other web sites, including our Facebook page, and have affiliations with other businesses including our resellers. Personal information that you provide to our affiliated sites or businesses may be sent to iPantry in order to deliver the services, and personal information you provide to iPantry may be used to deliver the services on those sites, and also be provided to businesses affiliated with iPantry in order to enable us to deliver our services and products. We process such information under this Privacy Policy and any other applicable privacy policy (including policies existing on other sites and other businesses).
- (g) **Third Party Applications** – iPantry may make available third party applications through its services. The information collected by iPantry when you enable a third party application is processed under this Privacy Policy. Information collected by the third party application provider is governed by their privacy policies.
- (h) **Other sites** – This Privacy Policy applies to iPantry services only. We do not exercise control over the sites displayed as search results, sites that include iPantry applications, products or services, or links from within our various services. These other sites may place their own cookies or other files on your computer, collect data or solicit personal information from you.
- (i) **Other sources** - From time to time iPantry may collect information from other sources. If this occurs we will take reasonable steps to advise you.

In addition to the above, we may use the information we collect to:

- (a) Provide, maintain, protect, and improve our services (including advertising services) and develop new services; and
- (b) Protect the rights or property of iPantry or our users.

If we use this information in a manner different than the purpose for which it was collected, then we will ask for your consent prior to such use.

iPantry processes personal information on our servers in Australia and in other countries. In some cases, we process personal information outside your own country.

## **2. Choices**

You can use iPantry's account management settings to review and control the information stored in your iPantry account (if any).

## **3. Information sharing**

iPantry only shares personal information with other companies or individuals outside of iPantry in the following limited circumstances:

- (a) We have your consent which may be express, or implied by your conduct.
- (b) We provide such information to our subsidiaries, affiliated companies or other trusted businesses or persons for the purpose of processing personal information on our behalf, or as otherwise specified in this Privacy Policy. We require that these parties agree to process such information based on our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality, privilege and security measures.
- (c) We have a reasonable belief (determined in our sole discretion) that access, use, preservation or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process (including but not limited to subpoena or order for discovery) or enforceable governmental request, (b) enforce applicable terms of service, including but not limited to the iPantry Terms and Conditions, including investigation of potential violations of these, (c) detect, prevent, or otherwise address fraud, security or technical issues, or (d) protect against harm to the rights, property or safety of iPantry, its users or the public as required or permitted by law.

If iPantry becomes involved in a merger, acquisition, or any form of sale of some or all of its assets, we will ensure the confidentiality of any personal information involved in such transactions and provide notice to you before personal information is transferred and becomes subject to a different privacy policy. You authorise us to transfer your personal information if iPantry becomes involved in a merger, acquisition, or any form of sale.

## **4. Information security**

We take appropriate security measures to protect against unauthorised access to or unauthorised alteration, disclosure or destruction of data. These include internal reviews of our data collection, storage and processing practices and security measures, including appropriate encryption and physical security measures to guard against unauthorized access to systems where we store personal data.

Your account information is protected by a password for your privacy and security. You need to work with us to protect against unauthorised access to your password and to your computer by signing off once you have finished using a shared computer. When you enter sensitive information (such as credit card number) for registration iPantry encrypts that information using secure socket layer technology (SSL). iPantry follows generally accepted industry standards to protect the personal information submitted to us, both during transmission and once iPantry receives it. No method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while iPantry strives to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

We restrict access to personal information to iPantry employees, contractors and agents who need to know that information in order to process it on our behalf. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination (if we consider this appropriate in our sole discretion) and possible criminal prosecution, if they fail to meet these obligations.

## **5. Accessing and updating personal information**

When you use iPantry services, we make good faith efforts to provide you with access to your personal information and either to correct this data if it is inaccurate or to delete such data at your request if it is not otherwise required to be retained by law or for legitimate business purposes. We ask individual users to identify themselves and the information requested to be accessed, corrected or removed before processing such requests, and we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup tapes), or for which access is not otherwise required. In any case where we provide information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort which we will determine in our absolute discretion. If you wish to delete your personal account information, please email us at [info@ipantry.com.au](mailto:info@ipantry.com.au). Because of the way we maintain certain services, after you delete your information, residual copies may take a period of time before they are deleted from our active servers and may remain in our backup systems.

## **6. Enforcement**

This Privacy Policy is governed by the laws of the State of New South Wales, or where applicable, the Commonwealth of Australia. All users agree to be bound by these laws and to submit to the exclusive jurisdiction of the Courts of either jurisdiction.

iPantry regularly reviews its compliance with this Privacy Policy. When we receive formal written complaints, it is iPantry's policy to contact the complaining user regarding his or her concerns. We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that cannot be resolved between iPantry and an individual.

## **7. Changes to this Privacy Policy**

Please note that this Privacy Policy may change from time to time. We will post any Privacy Policy changes on this page, and may notify you if we consider it to be appropriate (in our sole discretion).