

Privacy Policy

Overview

Thankyou Group Pty Ltd ACN 132 861 879 ("TYG", "we", "us" and "our") recognises the importance of safeguarding your personal information.

Your privacy is important to us and we want to manage your personal information in a professional and responsible manner.

This Privacy Policy sets out how we will protect your privacy rights in the collection, storage, use and disclosure of your personal information for the purpose of the Privacy Act 1988 and the Australian Privacy Principles ("APPs") prescribed therein. For people situated in the European Union, the United Kingdom or the State of California, they may have additional rights, and we may be subject to additional laws, which are set out at the end of this Privacy Policy.

Children's personal information

We will not knowingly collect personal information from children under 16. If we learn that we have collected personal information of a child under 16 other than with parental or guardian consent, we will delete that information.

Collection of Personal Information

Personal information is any information or opinion (whether true or not), which either identifies you or from which your identity can reasonably be determined.

We only collect your personal information where that personal information is necessary for one or more of our functions or activities.

The types of personal information we collect may differ depending on your relationship with us. Personal information includes:

- in the case of our launch team members, representatives, and supporters who register their interest to receive more information about the business - your full name, physical address, email address, phone number/s, date of birth and occupation;
- in the case of the general public contacting our customer service function wishing to make a complaint, provide feedback, submit an enquiry, request a call-back or request a product replacement - your full name, physical address, email address and phone number/s;
- in the case of the general community of supporters and subscribers who wish to be kept informed of our latest business news, promotions, events or products or to receive our regular company newsletter – your full name, physical address, email address and phone number/s;
- in the case of customers purchasing our products via our online store or through an online corporate order - your full name, physical address, email address, phone number/s and credit card or other payment details used.
- in the case of customers who have created a Track Your Impact user profile - your email address (or if you have registered your profile using your Facebook or Google account, your public profile and personal details linked to those accounts and made available to our Track Your Impact application.)
- in the case of our suppliers, key customer account managers and distributors - your name, physical address, email address and phone number/s;
- in the case of market research participants - your name, physical address, email address, phone number/s; age, gender and occupation;
- in the case of workforce candidates (including potential employees, contractors and volunteers) - information which may be contained in a resume and which may be recorded during any interview or pre-employment checking; and

- in the case of trade credit applicants - information which we may require to assess your credit worthiness, for example your credit or business history.
- in the case of website visitors and users generally - customer demographics information (such as age range, gender and location) obtained through various analytics tools, and technical information as described below in "Digital Information and Cookies".

Collection of Sensitive Information

Sensitive information is personal information that includes information about your:

- racial or ethnic origin;
- political opinions;
- sexual preferences or practices;
- criminal record; or
- health.

In general, we do not collect sensitive information about you. However, we will only collect this information if it is necessary to do so and you have consented to its collection. For example, if you report a health concern or issue related to our products, we would ask you for details of any illness or injury you have suffered and other health related details. We may also require you to undertake a police check as part of your employment with us or if you have been invited to participate in a projects trip to visit one of our funded programs. We will not use or disclose your sensitive information other than as allowed by the law or with your consent.

Can you choose not to disclose your personal information?

If you contact us to make a general inquiry about our business or products, you do not have to identify yourself or provide any personal information unless you require us to get back in touch with you at a later stage, address a complaint or request that necessarily requires us to use your personal information, or if you would like us to send you further information or products.

You can also notify us that you wish to deal with us by not identifying yourself or using a pseudonym. However, if we are not able to collect personal information about you we may not be able to provide you with the products, services, information or assistance you require.

For example we will not be able to send you information about our products if you have not provided us with a valid email address or phone number.

How we collect your personal information

We collect personal information from you in the following ways:

- when you contact our customer service function in person, via telephone, email or webchat;
- when you sign up as a launch team member via our web page;
- when you sign up to receive our newsletter or other marketing materials;
- when you complete your purchase order details in our online store;
- when you enter a competition or register for an event;
- when you apply for employment with us and during the recruitment process;
- when you conduct business with us;
- when you agree to participate in a market research initiative;
- when you apply for trade credit with us;
- when you provide your information to our staff;
- when you supply goods and/or services to us;
- when you submit any Personal Information through a Facebook Lead Ad; and
- when you visit or use our Website.

When collecting this personal information, we will do so only by lawful and fair means and not in an unreasonably intrusive way. TYG may use third party service providers to collect and store

personal information on our behalf. Where it is reasonable and practicable to do so, we will only collect personal information about you from you directly and not from third parties. However, in some instances, this will not be practicable. In some cases, we collect personal information about you from publicly available sources (such as the internet) and from third parties (such as mutual contacts or your referees provided during the recruitment process if you apply for a job with us).

How secure is my personal information?

TYG takes reasonable steps to protect and store your personal information, including limiting access to such information to internal employees on a need-to-know basis and using password protected servers.

However, when submitting any personal information about yourself on the internet, it is important to note that internet security is not absolute. TYG takes reasonable steps as required by the Privacy Act to ensure that our website is protected from outside sources, and we encourage you to make sure your computer is adequately protected. If you post personal information on our website, we will consider that you have consented to the collection of this information.

In all instances, regardless of the method used to collect your personal information, we will deal with it in accordance with this Privacy Policy.

Use of your personal information

We will use your personal information for the primary purpose for which it was collected. The primary purpose of collection is the main reason we collect your personal information in the first instance.

The primary purpose for collecting your personal information will vary depending on the nature of your relationship with us.

- in the case of our launch team member, representatives, and supporters – the primary purpose would be to send you information about our business, products, giving-model and upcoming events;
- in the case of the general public contacting our customer service function – the primary purpose would be to respond to your complaint, feedback, enquiry or to send you information or replacement products;
- in the case of our general community of supporters or subscribers – the primary purpose would be to keep you informed of our latest business news, direct marketing initiatives, promotions, events or products or to receive our regular company newsletter;
- in the case of customers purchasing our products via our online store or through an online corporate order – the primary purpose would be to enable us to complete your order and to keep you informed of future online store promotions and direct marketing initiatives;
- in the case of our suppliers, distributors and key customer account managers – the primary purpose would be to maintain a business relationship with you;
- in the case of market research participants – the primary purpose would be to understand and better serve our customers, and improve the quality and level of the products we offer to customers;
- in the case of workforce candidates (including potential employees, contractors and volunteers) – the primary purpose would be to consider your application as well as consider you for any future suitable job opportunities;
- in the case of trade credit applicants, information which we may require to assess your credit worthiness, for example your credit or business history;
- in the case of Facebook Lead Ads, for direct marketing and other digital marketing campaigns; and
- in the case of Website visitors, information to help us develop marketing insights as well as help inform our digital strategy.

We will only use personal information beyond the primary purpose where it is related to that purpose or where you consent to the further use.

Do we disclose your personal information to third parties?

When you provide your personal information to us it may be transferred to our service providers, including those located outside of Australia.

The types of persons and organisations to which we may disclose your personal information include the following:

- organisations with whom we have arrangements or agreements for the purpose of promoting our products or services and any agents used by us in administering such arrangements or agreements;
- our employees, agents, contractors and external advisers who carry on our functions and activities or who assist us to carry on our functions and activities from time to time;
- organisations who are contracted by us to perform certain services, including to maintain our website;
- our legal advisors, when needed; and
- other parties to whom we are authorised or required by law to disclose information.

TYG does not sell or share your personal information with any other company for that company's direct marketing services.

For clarity, we may share your personal information to our service providers who may use the personal information for direct marketing services on our behalf, however we will not share your personal information with other companies for the purpose of those companies marketing their own products to you unless we specifically ask for, and receive, your permission to do so. Although we do not actively disclose your Personal Information to third parties, we do engage digital service providers such as Google and Facebook, which will have access to certain Digital Information relating to you. Please refer to the section below relating to "Digital Information and Cookies".

Can you remove your personal information from our records?

If you do not wish to receive ongoing promotional news or information about our products and services, you can request to be withdrawn from our contact list or marketing database at any time, either by contacting us or by using the opt out function contained in our direct marketing, newsletter or other emails.

Once you have made this request, TYG will remove your personal details and will no longer continue to engage in any direct marketing communications with you.

We are obligated by law to retain some types of personal information, such as employee records, for a set period of time. As such, we will not allow removal of such personal information.

How long will we keep your personal information?

In general, we will retain and use your personal information to communicate with you indefinitely until you "opt out" of these communications by informing us that you no longer wish to receive such communications.

For certain types of personal information, particularly employee records, we are obliged to retain these for seven (7) years after an employee finishes their employment with us. If you submit your personal information as part of a job application, your details are stored on a secure recruitment database for our records. This allows us to consider your application for future vacant positions if you are unsuccessful in obtaining a position with us at first instance. It is our usual practice to request your permission to contact you about future job vacancies. You are entitled to request that we remove your information from this database.

Digital Information & Cookies

"Cookies" are a standard for storing small pieces of data on a web client (i.e. the web browser on your computer). TYG websites store a unique ID on your web client in order to identify you while using the website. Some cookies are necessary to make our website work or to facilitate the transmission of a communication. You may be able to disable these in your browser settings but this may negatively affect your experience with our website.

In addition, TYG has implemented certain Google Analytics Advertising Features on its Website. These include Data Collection for Google Analytics Search & Display Network Remarketing, Audience Demographics & Interests Reporting and Display Network Impression Reporting.

These features may provide us with marketing insights into certain customer attributes and preferences when using the internet and various digital platforms ("Digital Information").

Digital information we may collect may include the Internet protocol (IP) address used to connect your computer to our Website, login information (if applicable), browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, the full Uniform Resource Locators (URL) clickstream to, through and from TYG's website (including date and time); products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

However, given that this information may not always be personally identifiable information, it may not constitute Personal Information. Nevertheless, our use of such Digital Information shall be governed by this Policy.

As part of the Google Analytics Features used on the Website, TYG may also use Google Analytics cookies and advertising cookies.

You can opt-out of the Google Analytics Advertising Features you use, including through your browser Ads Settings, Ad Settings for mobile apps, or any other available means. Please refer to Google Analytics' currently available opt-out add-on to your web browser to prevent access to your Digital Information.

Links to Other Sites

You should be aware that when you are on our website, you could be directed to other sites that are beyond our control. These other sites may send their own cookies to users, collect data or solicit personally identifiable information. You therefore need to check the individual privacy policy of any third party when accessing other websites that may be linked to our websites. This Privacy Policy is strictly limited to TYG's collection, storage and use of personally identifiable information and does not apply to third party websites. Please keep in mind that whenever you give out personal information online, for example, via message boards or chat, that information can be collected and used by people you do not know. TYG does not guarantee the security of any information you disclose online and you do so at your own risk.

Accessing and amending your personal information

Under the Privacy Act 1988 you have rights of access to and correction of personal information that we hold.

To access your information is generally a free service. Sometimes, we may ask that you send this information to us in writing to assist us. On occasion, if furthermore detailed personal information is in our archives, a small fee may be charged to cover the cost of obtaining the information for you. We will inform you of any charges payable upon your request.

You may request access to the personal information we hold about you and seek the correction of such information by contacting our customer service function at .

TYG aims to respond to requests for access to personal information within 30 days.

The Privacy Act does permit us to deny you access to your personal information in certain circumstances, including if:

- there is current or pending litigation regarding the personal information;
- the request is frivolous;
- permitting access would be in breach of the law;
- providing the information would pose a threat to health or public safety; or
- providing the information would interfere with another person's privacy.

Any denial of a request for access to personal information will be accompanied by an explanation setting out our reasons for doing so.

Where any information is not accurate, up-to-date or complete, you can request that the information be amended.

In some instances where it is not practical to update your personal information, we may choose to note your desired changes and place them together with the original personal information on our records.

Disclosure of personal information overseas

Due to the nature of our business, personal information collected by us is likely to be disclosed to overseas recipients, being to related bodies corporate or service providers we may engage in connection with our business. Personal information is likely to be disclosed to: United States of America, Netherlands, New Zealand and Hong Kong. This is not an exhaustive list.

Changes to our Privacy Policy

TYG reserves the right to modify or update this Privacy Policy at any time without prior notice. If we modify or update our Privacy Policy, we will post the revised policy on our website.

Enquiries and Complaints

If you wish to access or correct your personal information, or if you have any concerns or enquiries about how we deal with your personal information, you should contact us at hello@thankyou.co or, if you are in Australia, you may call us on 1300 655 887.

If you no longer want us to use the information collected in the manner described in this Privacy Policy, please contact us at the email address or phone number listed above.

If at any time you believe that we have not adhered to this Privacy Policy or the APPs, or if you are concerned that there may have been a breach of your rights under the applicable laws, or if you have any other comments on this Privacy Policy, please notify us via the above contact details. TYG takes such matters seriously and we will use all reasonable efforts to promptly deal with the matter.

The privacy legislation requires us to respond to your request in 30 days, and you must allow us the full 30 days to respond before you can escalate any complaint you may have.

We will at first seek to deal with you via phone. If your complaint is not satisfactorily resolved after the phone call, we would meet with you in person. If you are not satisfied with our response to your complaint after this meeting, you can refer your complaint to the Office of the Australian Information Commissioner (refer to OAIC website at www.oaic.gov.au for more details)

Notice to Residents in the United Kingdom and European Union

For the purpose data protection legislation, the "data controller" is Thankyou Group Pty Ltd of 92 Rupert Street, Collingwood, Victoria, Australia.

Your personal data may be transferred to Australia for the purposes set out in this Privacy Policy but we will ensure that there is a lawful basis to do so and, as applicable, that appropriate protections are in place such as requiring Binding Corporate Rules to be in place or are subject to standard contractual clauses that provide appropriate protection for the purpose of EU law.

The data that we collect from you may be processed by personnel, or suppliers, operating outside the European Union or the United Kingdom. These people may be engaged in, among other things, the fulfilment of your order, the processing of payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing

You have the right to object to the processing of your personal data in certain circumstances or withdraw your consent to the processing of your personal data where this has been provided. You also have the right to access information held about you and for this to be provided in an intelligible form. If you would like a copy of some or all of your personal information, you may contact us under the "Enquiries and Complaints" section of this Privacy Policy or you may write to us at hello@thankyou.co. You may also ask us to undertake the following:

- update or amend your personal data if you feel this is inaccurate;
- remove your personal data entirely, in certain circumstances;
- if you have supplied us personal data, send you copies of that personal data in a commonly used format and transfer it to another entity; or
- restrict the use of your personal data.

Notice to Residents of California

For the purpose of the California Consumer Protection Act ("CCPA"), in addition to the information contained elsewhere in this Privacy Policy, residents of California are advised that we may:

- collect the following categories of personal information: Identifiers/Contact Information, Characteristics of Protected Classifications Under Federal and State Law, Commercial information, Purchase History or Tendencies, Internet or other electronic network activity information, and inferences drawn from the above; disclose the following categories of personal information for a business purpose: Identifiers/Contact Information, Characteristics of Protected Classifications Under Federal and State Law, Purchase History or Tendencies, Commercial information, Internet or other electronic network activity information, and inferences drawn from the above.

Californian consumers also have the following rights:

- Up to two times every 12 months, you may request a copy of the personal information that we have collected about you in the prior 12 months, the categories of personal information we collect, the categories of sources, the business or commercial purposes for collecting your personal information, the categories of third parties with whom we share information, and, if applicable, the categories of third parties to whom we may well personal information.
- You may request that we delete personal information that we have collected about you, except some exceptions apply to that right, such as if we need the information to complete a transaction, to detect and protect against fraudulent and illegal activity, to exercise our rights, or to comply with a legal obligation.

To take advantages of these rights, you can contact us using the methods set out above under "Enquiries and Complaints". We may need to verify your identity or, if applicable, require you to log into an account established with us.

We will not discriminate against a person who exercises these rights.

Last updated on: 29th September 2020