

byfreer .

Website Privacy Policy

1. Protection of your personal information

ROUNDSQUARE PTY LTD trading as byfreer. (ABN 48 602 528 638) (byfreer, we or us) is the operator of this website. byfreer is committed to respecting and protecting the privacy of your personal information. This privacy policy explains how personal information may be collected through the www.byfreer.com.au website and all (mobile) applications which refer to this privacy policy, where the information is held and how it will be handled. This privacy policy also applies to personal information collected by byfreer if you contact customer service in relation to this website.

The terms of this privacy policy are subject to any specific provisions dealing with privacy that may be contained in the terms and conditions for particular offers, products and services made available through this website.

By accessing or using this website, mobile application or other byfreer product or service on any computer, mobile phone, tablet, console or other device, you consent to our Privacy Policy. byfreer may modify this Privacy Policy at any time effective upon its posting. Your continued use of our products and services constitutes your acceptance to this Privacy Policy and any updates.

2. What personal data is collected

All our activities are based on stringent ethical principles and we are committed to providing a good level of protection for the privacy of all visitors to our website and our (mobile) applications. For this reason, the way in which we collect and store information is dependent on how our website and related services are used.

2.1 Data collected by automated means

Various technologies may be used on our websites and our (mobile) applications in order to make them more user-friendly, effective and secure. Such technologies may lead to data being collected automatically by us or by third parties on behalf of us. This data does not generally contain personal details about the user. Examples of such technologies are cookies, flash cookies and web analytics.

2.1.1 Click-stream data

A visit to one of our websites results in data that is transmitted from your browser to our server being automatically collected and stored by us or by third parties on behalf of us. This data can include, in particular, the following:

- the visitor's IP address
- the date and time of the visit
- the referral URL (the site from which the visitor has come)
- the pages visited on our website
- information about the browser used (browser type and version, operating system, etc).

2.1.2 Cookies

A number of places on our website and (mobile) applications make use of so-called cookies. These are essentially small text files that are stored on your computer's hard drive or your user device by your web browser. We can use cookies to identify the owner of a user account and to store articles in a shopping

basket during the purchasing process. In other words, cookies help to make our website or (mobile) application more user-friendly, more effective and more secure. The cookies usually used by us are so-called "session cookies", which are automatically deleted at the end of the visit to the respective website. By default, browsers enable the use of cookies but this function can also be disabled. However, this will result in some services not being available. It is also possible to manually delete cookies after their use via the web browser. byfreer is not aware of any cases in which cookies have caused damage to a computer or user device or facilitated viral infections.

2.1.3 Flash cookies

A special form of cookie is the so-called flash cookie. In contrast to normal cookies, these cookies are not created and saved by the browser but are governed by the Adobe Flash plug-in. These can contain more information than normal cookies and cannot be deleted or disabled via the browser; this is only possible using tools such as the website. You can also obtain more information about these cookies on that website.

2.1.4 Web beacons and tracking links

Web beacons (also known as pixel tags and clean GIFs) involve graphics that are not apparent to the user. Tracking links and/or similar technologies consist of a few lines of programming code and can be embedded in our website or (mobile) application. In conjunction with cookies, these are primarily used for statistical analysis purposes. This technology can also be used for tracking traffic patterns on websites, as well as finding out if an e-mail has been received and opened and to see if there has been any response.

2.1.5 Web analytics

Web analytics is the term given to a method for collecting and assessing the behaviour of visitors to websites and (mobile) applications. This includes the analysis of traffic patterns in order, for example, to determine the frequency of visits to certain parts of a website or (mobile) application, or to find out what information and services our visitors are most interested in. For these purposes, we primarily make use of click-stream data and the other techniques listed above. Web analytics are carried out by Coremetrics and/or other selected parties. You can find out more information about the processing of web analytics data by Coremetrics in section 10 below.

2.2 Information provided by yourself

Besides the data collected by automated means, we also collect personal information which you provide to us. This includes, but is not limited to:

- if you make an order, your contact information including your (first and last) name, (billing or delivery) address, birthdate and email address and, optionally, your telephone number. We need your e-mail address and (optionally) telephone number so that we may contact you if we have questions or information for you regarding your order;
- other information required to be able to process your order, such as information concerning the products you have ordered, the billing and delivery address, banking and/or credit card details;
- if you have created an online profile, the preferences and interests stored in this profile (please see below for further information concerning the profiles);
- if you have contacted customer service, the details of this contact and the contact history.

All of this information is characterized by the fact that you have provided this information yourself. We use this information for the purposes described in this privacy policy.

2.3 Information provided by others

We may also collect personal information about you from a third party through the "send to a friend " facility, where individuals can send an email to a friend, telling them about a product they have found on the website. In this case, we need to know the name and e-mail address of the recipient. That information will only be used for the specific purpose (delivering the email) and we will not further contact the third party unless the third party contacts us.

3. How is the collected information used

We will use your personal information for purposes relating to your order; e.g., to notify you regarding the status of your order or delivery. We may use your data for the purpose of the assessment of your creditworthiness, for which we may use third parties. If you have provided us with your personal information in relation to a promotion, event, (mobile) application, etc, we may send you emails or other messages which relate to the service you have requested.

If you contact customer service, we may use your personal information (including your contact history) so that customer service is able to process your request and provide you with the best service possible.

If you have given us your personal information during a sale of a product or service, we may inform you about similar products and services. We may also contact you to ask for your feedback after a sale of a product or service. In case of an interrupted sales process we may send you a reminder. We may send this information to you in a number of ways, including by regular mail, e-mail, SMS and MMS. You can immediately unsubscribe from these communications at any time by contacting us using the contact details below or (in the case of electronic messages) by clicking on a link in the corresponding e-mail or other message (see further below in paragraph 5). Your consent to receiving these communications will remain current until you advise us otherwise.

We will not send you any commercial electronic messages such as SMSes or emails unless this is permitted by the Spam Act. Any commercial electronic message that we send will identify byfreer as the sender, include our contact details and provide an unsubscribe facility. Similarly, we will not call you on a number listed on the Do Not Call Register unless this is permitted under the Do Not Call Register Act and related instruments.

If you have consented to be contacted we may contact you per regular mail, e-mail, per SMS, per telephone or any other electronic means for marketing, advertising and opinion research purposes of the byfreer Group, and your consent will remain current until you advise us otherwise. This includes for example providing you with information related to products of the byfreer Group, ecommerce activities, special offers, promotions as well as information on local store openings, local store activities of the byfreer Group or sporting events. In order to be able to contact you with information which is of special interest for you, your overall interaction with byfreer and its parent company byfreer AG (such as but not limited to your shopping behaviour in e-shops, in byfreer physical stores, your use of loyalty programmes, your ratings and reviews of products, your contact history with our customer service, your newsletter clicks/ opening results, your surfing behaviour (web tracking), the newsletter types you are subscribed to, your participation in promotions or events, your interactions with mi coach and your use of (mobile) applications), will be combined analysed and used. We may provide your contact information to byfreer AG for marketing, advertising and opinion research purposes. Please find at section 5 information on how you can withdraw your consent.

We may also use your personal information for any purposes required or authorised by or under applicable law.

4. Disclosure of information

Your personal information will not be disclosed.

5. Your rights

If you provide us with personal information via our websites or other channels, this is done on an entirely voluntary basis. If you choose not to provide requested information, various customer benefits may not be available. In certain cases, only those people that have submitted the necessary personal information to us are able to order products, use certain services and in other ways avail themselves of the activities and offers available on our website and (mobile) application. As transparency and fair play are particularly important issues for us, we provide various options, depending on the exact circumstances, in order to help you retain control over your personal information. These options may include the possibility of displaying and editing your personal information online. It may also be possible to unsubscribe from services or delete user accounts or to receive information about the personal information held.

5.1 Right to opt-out

E-mails that byfreer sends to you that contain for instance a newsletter or marketing content, have the option to terminate the receiving of such e-mails (unsubscribe) by following the relevant instructions in the respective e-mail. If you want to stop receiving emails from us, you can simply click on this unsubscribe hyperlink and we will stop sending you emails forthwith.

If you do not wish information about your behavior at our website or (mobile) application being collected and assessed, you can opt-out of the gathering of the web analytics data as described below in section 10.

If you wish to opt-out of receiving promotional information and offers in general, including by regular mail, e-mail, per SMS, by telephone or by any other electronic means, or if you want to withdraw your consent, you may at any time contact us by using the contact details below. In case we have doubt about your identity, we can ask you to identify yourself (e.g. by sending a copy of your passport ID).

With regard to other types of messages you may receive, such as maintenance announcements or administrative notifications, the receiving of these can only be terminated by deleting your account, as such messages are a mandatory part of user accounts and the related use of our websites and (mobile) applications. You can have your account deleted by sending an [email](#) to customer service.

5.2 Right to request access

You have the right to request access to the personal information byfreer holds about you. Subject to some exceptions permitted by law, byfreer will generally provide you with such access (although a fee may be imposed). Requests for access should be made using the contact details in the Contact Information section below.

5.3 Right to request correction

You have the right to request to correct the personal information byfreer holds about you. We will notify you within four weeks of receiving the request as to whether and, if so, to what extent, we will comply with your request. If for any reason we don't comply with your request, we will provide you with the reasons.

6. Security of the information and data integrity

We take appropriate technical and organisational measures to protect personal information against accidental or unlawful destruction, loss, alteration, unauthorised use, disclosure or access, in particular where the processing involves the transmission of data over a network, and against all other unlawful forms of processing and misuse.

7. Protection of children's personal information

The protection of children's personal information is extremely important. byfreer feels that it has a responsibility to protect the privacy of children and has no intention of collecting the personal information of children under the age of 15. We also encourage parents and other guardians to surf the Internet together with their children and participate with their children in the multitude of activities offered by the wide range of websites on the World Wide Web (www).

If a child under the age of 15 attempts to register himself or herself, he or she is initially asked to provide the information as described in the above section entitled "What personal information is collected". In addition, the data submitted by and collected about the child during the course of his or her visit (e.g. via cookies) may be used as described above.

If a child under the age of 15 attempts to submit a registration application, this will be rejected with the notification that applications from children under the age of 15 are not accepted. For that reason, we ask parents and other guardians to check on and monitor their children's Internet usage in order to protect them.

8. Social Networks

Our website and (mobile) applications provide you Social Plug-ins from various social networks. If you choose to interact with a social network, your activity on our website or via our (mobile) applications will also be made available to social networks such as Facebook and Twitter.

If you are logged in on one of the social networks during the visit of one of our websites or (mobile) applications the social network might add this information to your profile. If you are interacting with one of the Social Plug-ins, this information will be transferred to the social network. In case you do not wish such a data transfer, please log off on your social network before you enter one of our websites or (mobile) applications.

We cannot influence this data collection and data transfer via the Social Plug-ins. Please read the privacy policies of those social networks for detailed information about the collection and transfer of personal information, what rights you have and how you can achieve satisfactory privacy settings.

9. Geolocation Services

We offer location-enabled services within some of our (mobile) applications, such as Google Maps and Bing Maps. If you use those (mobile) applications, they may receive information about your actual location (such as GPS signals sent by a mobile device) or information that can be used to approximate a location. You are always asked if the Geolocation Service can be activated and you can also object to this Geolocation Service within the respective (mobile) application.

We use the Google Maps service or the Bing Maps service to assist you in finding the next byfreer store. To facilitate this, we load an image from Google Maps or Bing Maps, saving the route data and map image on our server.

10. Web analytics by Coremetrics

The web analytic services on our website and (mobile) applications are provided by Coremetrics (www.coremetrics.com). This means that when you visit our website or (mobile) applications, a cookie by Coremetrics will be stored on your computer or mobile device, except when your browser settings don't allow for such cookies (see 2.1.2 above).

This further means that when you visit our website or (mobile) application, the web analytics data described above in chapter 2 – including the "click-stream data", the data from "web beacons and tracking links" and information stored in Coremetrics' cookies – will be sent to Coremetrics for analysis for and on behalf of byfreer. Please note that if you have created an online profile at our website or (mobile) application and if you are logged on in this profile, a unique number identifying this profile is also being sent to Coremetrics in order to be able to match the web analytics data to this profile.

Coremetrics acts as an agent to byfreer, which means that byfreer solely determines the purposes for which the data is being used and that Coremetrics will not disclose the information to any third parties (except when required to do so by law or court order). You can find out more about the relationships between byfreer and Coremetrics in the Coremetric's privacy policy under "Privacy Policy for Our Provision of Services" at <http://www.coremetrics.com/company/privacy.php#services>.

If you do not wish information about your behaviour at our website or (mobile) application being collected and assessed by Coremetrics, you can apply for a visitor opt-out. This means that Coremetrics will, depending on the type of opt-out you choose, either anonymize the information it collects (but keeps collecting the data) or stop collecting information about your visit at all. This visitor opt-out requires you to accept a cookie being stored on your computer by Coremetrics. You can apply for the visitor opt-out on the link in the privacy policy section of the Coremetrics website.

11. Retargeting Technologies

Our website and (mobile) application use retargeting technologies within the internet. This enables us to show our visitors, who were already interested in our shop and our products, advertisements from us on partner websites. We are convinced that the display of a personalized, interest-based advertising is more interesting than advertising that does not have a personal connection.

We also work with other companies who use tracking technologies to serve ads on our behalf across the Internet. These companies may collect non-personally identifiable information about your visits to our websites or (mobile) applications and your interaction with our communications, including advertising.

Retargeting technologies analyse your cookies and display advertisements based on your past surfing behaviour. For further information on cookies, please refer to section 2 of this privacy policy.

We do not store any personal information about you with this technology.

12. Contact Information

If you have any questions about your privacy or our privacy policy you are welcome to contact us. The contact details are:

Roundsquare trading as byfreer

Unit 1

12 Burge Street

Vaucluse

New South Wales

2030

Australia

E-Mail

13. Complaints

Please contact the byfreer privacy officer using the above details if you have any concerns or complaints about the manner in which your personal information has been collected or handled by byfreer, and we will investigate your complaint.

14. Changes to this policy

byfreer has pledged to adhere to applicable privacy law and considers the privacy policy as being binding in nature. We therefore regularly review our privacy policy in order to ensure that it is free of errors, is clearly visible on our website, contains all the required information, is implemented in full, and is compliant with applicable law. This privacy policy may be changed from time to time in order to keep pace with new developments and opportunities relating to the Internet and to stay in line with prevailing legislation. Significant changes to the policy will be publicized on our website along with an updated version of the privacy policy.