



## EnsureFlow Pty Ltd ACN 634 750 280

### Privacy Policy: Users

#### 1. About this Policy

EnsureFlow Pty Ltd ACN 634 750 280 (“**EnsureFlow**”, “**we**” or “**our**”) is committed to protecting individuals’ privacy and complies with the *Privacy Act 1988* (Cth)(“**Act**”). EnsureFlow collects, uses, holds and discloses personal information in accordance with the Australian Privacy Principles (“**APPs**”) contained in the Act.

EnsureFlow aims to provide users (“**Users**”, “**you**” or “**your**”) of our Booking Website, as operated under the URL [www.taoffice.collectivetradeservices.com.au](http://www.taoffice.collectivetradeservices.com.au), and of our associated mobile phone or tablet applications (**together the “Booking Website”**) with information that meets their needs. To do so, EnsureFlow may collect personal information about you each time you visit or use the Booking Website.

This privacy policy (“**Policy**”) outlines how EnsureFlow treats personal information that EnsureFlow collects and receives. The Policy applies to previous, current and prospective Users of the Booking Website.

Your use of the Booking Website acknowledges your agreement to and acceptance of both this Policy and of the terms and conditions of use of this Booking Website (“**Terms**”), which are available on our website ([www.taoffice.collectivetradeservices.com.au](http://www.taoffice.collectivetradeservices.com.au)).

EnsureFlow may modify, alter or otherwise change this Policy from time to time without notice to you. We encourage you to periodically review this Policy for changes. Your continued access to, or use of, the Booking Website means that you agree to and accept the changes we make to the Policy.

#### 2. Collection of personal information

##### 2.1. Personal information

Personal information is information or an opinion about an individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, or is recorded in a material form or not.

The types of personal information that EnsureFlow may hold include, but are not limited to, the following:

- name;
- mailing or street address;
- email address;
- telephone number and other contact details;
- date of birth or age;
- your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;
- details of any services that you have booked through the Booking Website or of any enquiries you have made to EnsureFlow in relation to the Booking Website, including any responsive or additional information EnsureFlow has provided to you;
- any additional information relating to you that you provide to us directly through the Booking Website or indirectly through your use of the Booking Website, your online presence or through other portals or accounts from which you permit us to collect information;
- any information you provide to us through customer surveys; and
- any other personal information that may be required in order to facilitate your dealings with us.

## **2.2 When we will collect personal information**

EnsureFlow may collect your personal information when you:

- register to use the Booking Website;
- complete forms, supply information or otherwise interact with the Booking Website;
- communicate with us through the Booking Website or by email at [tradeassist@RAA.com.au](mailto:tradeassist@RAA.com.au); or
- share information with us from other applications, services or portals or websites.

EnsureFlow will only collect personal information about you by lawful and fair means.

## **2.3. Automatic collection of anonymous data**

EnsureFlow may use pixel tags and other methods to gather information about the emails EnsureFlow sends to Users through the Booking Website. Pixel tags are tiny graphic files that are included in HTML-encoded email messages. When such a message is opened in an HTML-capable email program, the recipient's computer will access EnsureFlow servers to retrieve the pixel tag file, allowing EnsureFlow to record and store information such as an email address, date and time the recipient viewed the email message if the recipient's email program can receive HTML and other logging information.

EnsureFlow uses this information to optimise e-delivery of future messages to specific recipients and to provide information to Users with respect to emails they send through the Booking Website.

## **2.4. Cookies**

We may also use 'cookies' or other similar tracking technologies on our website that help us track your usage of the Booking Website and remember your preferences. Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser but the Booking Website may not work as intended for you if you do so.

## **2.5. What happens if you don't provide us with your personal information?**

You are not obliged to provide us with your personal information when we specifically request it. However, this may mean we are not able to facilitate the provision of services through the Booking Website.

You have the right not to identify yourself when dealing with us where it is lawful and practicable for us to allow it. However, the nature of our business is such that there may be practical limitations which impact our ability to facilitate this. For example, a User will be unable to book services through the Booking Website if they do not provide a name and address.

## **2.6. Consent to the collection, use and disclosure of personal information**

Where you provide us with personal information about third parties, such as for example your partner or tenant of your rental property, you must obtain that person's consent to provide the information, inform them about the purpose of the information given and confirm the person has read and understood this Policy and separately consents to their personal information being used by us in accordance with this Policy.

As a User, you are required to confirm to us that you and any other individuals whose information is provided consents to us collecting, using and disclosing your and their personal and sensitive information, however collected by us, in accordance with our Policy.

## **2.7. Withdrawing consent to the use of personal information**

You may withdraw your consent:

- to the use of personal information for secondary purposes;
- to being contacted in relation to any of our services; and
- to receiving marketing information,

by contacting EnsureFlow at [privacy@ensureflow.com](mailto:privacy@ensureflow.com).

## **3. Holding and storing personal information**

We hold and store personal information in our secure electronic databases, and in accordance with clause 7 of this Policy.

All information collected by EnsureFlow is stored in Australian Data Centres (which consists of a Private and Public Cloud).

## **4. Usage of personal information**

### **4.1 Purpose**

We may collect, hold, use and disclose your personal information for the following purposes:

- to enable you to access and use the Booking Website;
- to RAA and registered trades in connection with RAA Trade Assist;
- to operate, protect, improve and optimise the Booking Website, our business and our Users' experience, such as to perform analytics, conduct research and for advertising and marketing;
- to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- to comply with our legal obligations, resolve any disputes that we may have with any of our Users, and enforce our agreements with third parties.

RAA will collect, hold, use and disclose your personal information in accordance with the RAA Privacy Policy available at <https://www.raa.com.au/privacy-policy>.

### **4.2. Existing customer database**

Under no circumstances will EnsureFlow sell, share or rent the information on EnsureFlow's database in any manner to any third parties unless required by law or to RAA in connection with RAA Trade Assist.

EnsureFlow will not utilise the information on its database to send promotional information about EnsureFlow's services.

## **5. Correction and removal of personal information**

If EnsureFlow becomes aware that any personal information we hold is not correct, we will use our best endeavours to obtain the correct information by contacting the individual whose information is incorrect.

EnsureFlow allows its records containing personal information to be accessed and/or corrected by the individual concerned in accordance with the Act.

Individuals wishing to lodge a request to access and/or correct their personal information should contact EnsureFlow. You should provide sufficient detail about the information to help us locate it. We will then use commercially reasonable efforts to take corrective action within a reasonable time.

When personal information is no longer needed for any purpose for which the information may be used or disclosed, it will be destroyed or permanently de-identified.

In certain circumstances, EnsureFlow may refuse your request to correct your personal information. EnsureFlow will provide you with written notice about the refusal in accordance with APP 13.3.

## **6. Disclosure of information**

We will not disclose information collected about you without your consent, other than to RAA in connection with Trade Assist, to attend to your specific enquiries, improve customer experience, send you information about EnsureFlow the service you have booked through EnsureFlow (this will not include any marketing for additional products or services provided by EnsureFlow) or as required under law.

However, by using EnsureFlow's Booking Website, you authorise us to disclose personal information to third party agents or contractors who provide services to us in connection with the provision of products or services you have sought from us.

To carry out the purposes relevant to your relationship with EnsureFlow, we may disclose your publicly available personal information or personal information held by EnsureFlow to persons or organisations such as;

- service providers registered with EnsureFlow for the purpose of delivering services you have booked through the Booking Website;
- third parties who assist us in the detection and investigation of fraud;
- regulatory bodies and government agencies;
- other parties to whom we are authorised for mandatory professional standards or required by law to disclose information;
- third parties who assist us with the establishment or maintenance of legal claims;
- agents that we use in the ordinary course of operating our business such as for data processing, printing or mailing;
- third party software providers who store details of customer accounts for us or who provide other IT services.

We deal with third parties who are required to meet the obligations in the Act and as such, your personal information will only be used for the purposes for which we gave it to them.

## **7. Security**

EnsureFlow takes all reasonable steps to make sure that the personal information we collect, hold, use and disclose is accurate, complete and up to date. We will protect the personal information that we hold from misuse, interference and loss and from unauthorised access, modification or disclosure. Where permitted by law, we will destroy or permanently de-identify personal information that is no longer required.

We maintain strict procedures and standards and take all reasonable care to protect the security of your personal information received online and/or through the Booking Website. We use industry-standard security safeguards such as a 128-bit Secure Socket Layer (SSL) to transfer personal and financial information between you and our web servers coupled

with carefully developed security procedures. These measures are designed to protect Users' information from loss, misuse or unauthorised alteration.

No data transmission over the Internet can be guaranteed as fully secure. EnsureFlow cannot guarantee or warrant the security of any information you send to us using the Booking Website. You submit information at your own risk.

EnsureFlow employees are trained and required to safeguard customer and prospective customer Booking Website visitor information. Using physical, electronic and procedural safeguards, we restrict access to such personal information to only those employees who are required to know information for operational purposes.

## **8. Access to your personal information**

EnsureFlow will provide you with access to your personal information if practicable and will take reasonable steps to amend any personal information about you which is inaccurate or out of date. In some circumstances and in accordance with the Act, EnsureFlow may not be able to give you access to your personal information.

If we cannot give you access to your information we will provide you reasons for this decision.

To request to access your personal information, please contact EnsureFlow (details below).

## **9. Links to other websites**

The Booking Website may contain hyperlinks to other websites. When you use a hyperlink from the Booking Website to the websites of third parties, those websites are not subject to EnsureFlow's privacy and security standards. Please be aware that third parties may independently collect information about Users when they view advertisements or other communications from third parties through EnsureFlow's products or services. If Users do not want those companies to collect information about them, they should contact these companies directly.

## **10. Complaint and dispute resolution**

If you have any concerns or complaints about the way your personal information has been collected or handled, please contact EnsureFlow.

Please contact EnsureFlow if you wish to view this Policy in an alternative format. We will endeavour to respond and provide an alternative format as soon as possible.

The aim of the dispute resolution process, such as conciliation, negotiation or mediation, is to reach a settlement that will resolve a complaint.

Remedies for privacy related complaints may include one or more of the following;

- an apology to the individual;

- being provided with access to information;
- correction or amendment of a record;
- systems or procedures improvements, including changed or upgraded security arrangements for personal information;
- privacy notices being amended or updated; or
- staff training.

## **11. Data breach notification**

If an eligible data breach is reported EnsureFlow will take all reasonable steps to ensure an assessment is completed within 30 days. If an eligible data breach is confirmed, as soon as practicable EnsureFlow will provide a statement to each of the individuals whose data was breached or who are at risk, including details of the breach and recommendations of the steps individuals should take.

## **12. Questions and concerns**

If you have any questions regarding this Policy, the operation of this Booking Website, or your dealings with EnsureFlow, please email us at [privacy@ensureflow.com](mailto:privacy@ensureflow.com).

Further information about the application of the Act can be found at the Booking Website of the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).