

Privacy Policy

1 Definitions

1.1 In this Privacy Policy (**Policy**):

- (a) **Customer Data** means location data, vehicle data and any other data provided by the customer to iungo for the purposes of the Service;
- (b) **Platform** means the web portal and mobile application operated by iungo for the purposes of uploading and sharing the Customer Data;
- (c) **Service** means the provision of the Platform to the customer; and
- (d) **Website** means <http://www.app.iungo.com.au>.

2 Summarised extent of our commitment

- 2.1 This Policy sets out how iungo aims to protect the privacy of your personal information, your rights in relation to your personal information managed by iungo and the way iungo collects, holds, uses and discloses your personal information obtained through your use of the iungo Platform, Website and Services or otherwise throughout your interactions with iungo products or iungo.
- 2.2 iungo is committed to protecting your privacy and that of each of our customers. iungo has developed this Policy in line with the 'Australian Privacy Principles' in the *Privacy Act 1988 (Cth)* (**Act**).
- 2.3 iungo regularly reviews our practices and procedures regarding personal information and privacy and therefore this Policy may be updated from time to time.

3 What kinds of personal information do we collect?

- 3.1 Personal information is information that identifies an individual. During the provision of our services, we may collect your personal information.
- 3.2 Generally, the kinds of personal information iungo collects are your name, address, telephone number, and email address. In some circumstances we may also hold other personal information provided by you.
- 3.3 Our services enable the collection of data from vehicles that are connected to or otherwise enabled for use with our services. This data may include vehicle location data, driving behaviour data and other similar data. We cannot normally identify any particular individual from this data (such as the driver of the vehicle). However this data may be disclosed to third parties (for example an employer or fleet operator) who may be able to identify the driver of other individuals from this data.

4 How do we collect your personal information?

Generally, we collect your personal information directly from you, through the information provided during the registration and account set up process. There may be other occasions when iungo collects your personal information from other sources such as from an information services provider or a publicly maintained record.

5 Why do we need your information?

5.1 iungo collects, holds and uses your personal information:

- (a) so that we can allow you access to our Platform and Services and to allow processing of your online purchases and sales, including processing your payments for items purchased;
- (b) so we can identify you as a client and constantly improve your experience;

- (c) to operate, protect and optimise our Website, Platform and Services, business and our Users' experience, such as to perform analytics and conduct research;
- (d) to send you notifications, alerts, messages, notices, updates, reminders and any information that you have requested;
- (e) to send you marketing and promotional messages or other information that may be of interest to you, including information sent by, or on behalf of, our business partners that we think you may find interesting;
- (f) to administer rewards, surveys, contests, or other promotional activities or events sponsored or managed by us or our business partners; and
- (g) 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.

6 Who do we disclose your personal information to?

- 6.1 iungo discloses your personal information for the purpose that we collect it for. That is, generally, iungo will only disclose your personal information for a purpose related to the provision of the Platform and Services. This may include disclosing your personal information to third parties engaged to perform administrative or other services. This disclosure is always on a confidential basis. iungo may also disclose your personal information with your consent or if disclosure is required by law.
- 6.2 iungo may also disclose your personal information to a trusted third party who also holds other information about you. This third party may combine that information in order to enable it and us, to develop anonymised consumer insights so that we can better understand your preferences and interests, in order to personalise your experience and enhance the products and services that you receive.
- 6.3 We may also need to collect, use or disclose personal information about you in the following situations:
- (a) because it is required by law;
 - (b) to provide you with a service you have requested;
 - (c) to fulfil our terms, conditions, internal policies or business rules; and
 - (d) to protect our property rights, to protect any iungo' clients, users or any member of the public.

7 Overseas disclosure

We may disclose personal information that we gather to our cloud hosting provider, possibly outside of Australia. When you provide your personal information to us, you consent to the disclosure of your information outside of Australia and acknowledge that we are not required to ensure that overseas recipients handle that personal information in compliance with Australian Privacy Law. We will however, take all reasonable steps to ensure that any overseas recipient will deal with such personal information in a way that is consistent with the Australian Privacy Law.

8 Security of your personal information

- 8.1 iungo takes all reasonable steps to ensure that the personal information it holds is protected against misuse, interference, loss, unauthorised access, modification or disclosure. iungo holds personal information in both hard copy and electronic forms in secured databases on secured premises, accessible only by authorised staff. Although we make no guarantee as to the absolute security of your personal information, we will use all reasonable measures to maintain its security.

- 8.2 iungo will destroy or de-identify personal information in circumstances where it is no longer requires, unless iungo is otherwise required or authorise by law to retain the information.

9 Access to your personal information

- 9.1 iungo will take all reasonable steps to keep personal information it holds accurate, complete, up-to-date and relevant. You have a right to request access to the personal information we hold about you. Please contact us if you would like to access the personal information we hold about you. We will use reasonable endeavours to provide a complete list of your personal information within a reasonable period of receipt of your request. iungo may in certain circumstances charge you for these services.
- 9.2 You have a right to request correction of the personal information we hold about you. Please contact us to correct any of your personal information that you believe is inaccurate, incomplete or out-of-date. We will use reasonable endeavours to correct your personal information as requested within a reasonable period of receipt of your request. iungo will not charge you for this service. If applicable, any legal requirement on us to maintain certain records of your personal information shall prevail over any of your requests.
- 9.3 We may require you to provide your identity before providing you with copies of your personal information or otherwise allowing you to access or correct your personal information.

10 Cookies

- 10.1 We reserve the right to use a feature of your browser called a "cookie" to assign a "User ID". Cookies, by themselves, cannot be used to find out your identity or the identities of any of our users, but only identifies your computer to our servers when you visit our site.
- 10.2 Cookies are commonly used by websites on the Internet for identification purposes and to allow functions on websites to work as intended. Cookies are a small data file transferred to your device that recognises and identifies your device and allows your device to 'remember' information from the Websites for future use. Cookies do not contain any information that personally identifies you and we do not use Cookies in order to obtain such information – your personal information can only be obtained by iungo if you actively provide it to us. The information collected by way of Cookies is about our visitors as a whole, not about individuals. Your device should allow you to refuse Cookies if you wish by changing the settings.

11 Direct Marketing

- 11.1 iungo and/or its carefully selected business partners may use or disclose your personal information to send you direct marketing communications and information about our software products. This may take the form of emails, SMS, mail or other forms of communication, in accordance with the *Spam Act 2003* (Cth) and the *Privacy Act 1988* (Cth) . You may opt-out of receiving marketing materials from us by contacting us or by using the opt-out facilities provided (e.g. an unsubscribe link).

12 Applicable Law

- 12.1 The Websites are controlled by us from our offices in New South Wales, Australia.
- 12.2 Those who choose to access the Websites from locations outside Australia do so at their own initiative and are responsible for compliance with local laws. This Privacy Policy will be governed by and construed in accordance with the laws of New South Wales, Australia.
- 12.3 You irrevocably and unconditionally submit to the exclusive jurisdiction of the courts of New South Wales. If any provision of this Privacy Policy is found to be invalid or unenforceable by a court of law it will be severed from this policy, however such invalidity or unenforceability will not affect the remainder of this Privacy Policy which will continue in full force and effect.

13 How to contact us or make a privacy complaint

13.1 If you require any further information on the iungo Privacy Policy, or would like to access, correct or delete any of your personal information, or otherwise make a complaint concerning the privacy of your personal information held by us (including a breach of the 'Australian Privacy Principles' in the Act), please contact our Privacy Officer by email addressed to roy@iungo.com.au.

13.2 At all times, privacy complaints:

- (a) will be treated seriously;
- (b) will be dealt with promptly;
- (c) will be dealt with in a confidential manner; and
- (d) will not affect your existing obligations or affect the commercial arrangements between you and us.

Our Privacy Officer will commence an investigation into your complaint. You will be informed of the outcome of your complaint following completion of the investigation. In the event that you are dissatisfied with the outcome of your complaint, you may refer the complaint to the Federal Office of the Australian Information Commissioner.

This Privacy Policy is dated Oct 2018.