



Privacy Policy – FireReady Australia

This privacy policy (**Privacy Policy**) sets out how FireReady Australia Pty Ltd ABN 38 657 470 052 and its related bodies corporate (as defined in the *Corporations Act 2001* (Cth)) (**we, our, us**) collects, stores, uses, protects, shares and discloses your personal information.

This Privacy Policy applies to our website located at firereadyaustralia.com.au and its related services, products, websites, tools and applications (together the **Services**). By visiting or using our Services you agree to the collection, storage, usage and disclosure of your personal information by us in the manner described in this Privacy Policy.

1. Types of Personal Information we collect

As part of delivering our Services we may collect personal information about you as defined under the *Privacy Act 1988* (**Privacy Act**). We will only collect personal information where it is reasonably necessary for the performance of our services or functions. The personal information we collect may include the following:

- **Account information:** this includes information that we collect when you register to create an account on the client login portal of our website. The information we collect includes your name, email address, and other contact details and any other information you directly give us at the registration stage.
- **Client information:** this includes information that you have provided to us as a client of ours. The information we collect includes:
 - client business details;
 - client representative details (including employee names, positions and other details as required for us to provide our Services);
 - details of any previous training completed with us;
 - assessment results;
 - specific information relating to clients' building layouts and areas and other relevant areas;
 - details and any other additional information you provide to us directly or indirectly through your use of the Website. We use such information to assist in providing our services to you.
- **Profile information:** this includes any information that you choose to store on the Services that will assist us in delivering our services to you and includes information regarding any subscriptions.
- **Financial information:** this includes information such as payment card details and bank account details. We use this information to send to our third party payment gateways when you make a payment for Services.
- **Services use information:** any information you provide when you use our Services. For example, when you contact us we collect information that enables the Services to be able to run.
- **Marketing use information:** this includes information provided to us using a marketing or newsletter sign up form.
- **Surveys:** information in connection with surveys, questionnaires and promotions.
- **Other information we collect related to your use of the Services:** your device identity and type, I.P. address, geo-location information, page view statistics, advertising data and standard web log information and any other information provided by you to us via our Services or our online presence, or otherwise required by us or provided by you.

2. How we collect Personal Information

We may collect personal information either directly from you, or from third parties, including where:

- you register or sign up to the Services;
- you provide information directly to us through the Services or on a hardcopy form;
- you use our website generally;
- you receive a Service from us generally;
- you subscribe to any of our newsletters;
- you contact us through our website, in person, by phone or in writing;
- you submit any of our online sign up forms;
- you deal with us generally via email, letters, telephone, expos, website forms, SMS, social applications (such as LinkedIn, Facebook or Twitter) or otherwise;
- you interact with our Services, website, social applications, services, content, advertising and marketing campaigns; and/or
- you invest in our business or enquire as to a potential purchase of our business.

We may also collect your personal information from third parties including:

- referral agencies;
- government agencies and insurers;
- third parties who produce any content, advertising, and marketing campaigns for us that you may interact with; and
- our other service providers and publicly available sources.

Where we collect your personal information from a third party, we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party. By providing personal information about another person to us, you represent that you are legally permitted to do so, and we will not be responsible for verifying any such authorisation.

Cookies & data tracking technologies

We may also collect personal information from you when you use or access our Services or our social media pages. This may be done through use of web analytics tools, 'cookies' or other similar tracking technologies that allow us to track and analyse your Services usage. Cookies are small files that store information on your computer, mobile phone or other device and enable and allow the creator of the cookie to identify when you visit different websites. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience of the Service. Persistent cookies can be removed by following Internet browser help file directions. Cookies may enable automatic logins when you visit in the future and may enable content customisation.

We may also use third party vendor tracking cookies, including:

- Google Analytics and AdWords tracking cookie; and
- Facebook pixels; and
- Mailchimp pixel and tracking cookie.

You can opt out of Google's use of cookies or device identifiers by visiting Google's Ads Settings. Alternatively, you may visit the Network Advertising Initiative opt-out page or control the use of device identifiers by using your device's settings.

Third parties as set out above may use cookies, web beacons, and other storage technologies to collect or receive information from the Service and elsewhere on the internet and use that information



to provide measurement services and target ads. You can opt out of the collection and use of information for ad targeting using aboutads.info/choices.

3. Use of your Personal Information

We collect and use your personal information for the following purposes:

- to provide our Services, products and information to you including to:
 - assist in streaming and personalising information for you;
 - enable us to process your personal data;
 - manage our relationship with you, including information about similar Services, products or terms and conditions;
 - enable you to communicate with us regarding your use of the Services;
 - confirm your identity;
 - provide information about you to our contractors, employees, consultants, agents or other third parties for the purpose of providing the services to you; and
 - communicate with you about your records, or any transaction;
- to administer contracts including to negotiate, execute and or manage a contract with you;
- to be de-identified for the purposes of generating statistical data and improving the Services;
- for record keeping and administrative purposes, including accounting purposes;
- to administer, operate, protect, improve and optimise the website and our service offerings and customer experience;
- for advertising and marketing purposes (including for analytics);
- to comply with our legal obligations, resolve disputes or enforce our agreements with third parties;
- to enable you to take part in a competition;
- to send you marketing and promotional messages and other information that may be of interest to you and for the purpose of direct marketing (in accordance with the *Spam Act 2003* (Cth)). In this regard, we may use email, SMS, social media or mail to send you direct marketing communications. You can opt out of receiving marketing materials from us by using the opt-out facility provided (e.g. an unsubscribe link);
- for quality, training and coaching purposes;
- to send you administrative messages, reminders, technical notices, updates, security alerts, and other information about our products and services requested by you; and
- to facilitate employment enquiries.

You acknowledge and agree that we may also deal with your personal information in any other manner which is permitted by any agreement that we have in place with you, or otherwise in accordance with our other policies we have in place from time to time.

4. Disclosure of your Personal Information

We may disclose your personal information to third parties for the purposes contained in this Privacy Policy, including without limitation to:

Service Providers

We may share your personal information with service providers utilised by us in the provision of the Services to:



- develop and improve our Services;
- provide you with the Services;
- conduct quality assurance testing;
- provide support; and/or
- provide other services to us.

The service providers (and if necessary data processors) include:

- information technology service providers such as web host providers and analytical providers;
- mailing houses and such other suppliers that assist in delivering products and services;
- organisations who carry out credit, fraud and other security checks;
- payment processors;
- hosting services;
- content delivery services;
- IT support providers;
- marketing businesses engaged by us to disseminate materials to which recipients have consented; and
- specialist consultants.

We limit the information we provide to third parties to the information they need to help us provide or facilitate the provision of goods and services and associated purposes. We deal with third parties that are required to meet the privacy standards required by law in handling your personal information, and use your personal information only for the purposes that we give it to them.

Affiliates and Acquisitions

We may share some or all of your personal information with our parent company, subsidiaries, joint ventures, or other companies under a common control (**Affiliates**), in which case we will require our Affiliates to honour this Privacy Policy. In the event we are involved in a merger, acquisition or sale of assets we may disclose personal information collected by us to such entities that we propose to merge with or be acquired by, and will assume the rights and obligations regarding your personal information as described in this Privacy Policy.

Third parties with your consent and in other circumstances

We may also disclose your personal information to third parties to whom you expressly ask us to send the personal information to, or to third parties where permitted under the Privacy Act or where required in order to provide our Services to you. This also includes:

- your authorised representatives;
- fire services where a request is made for auditing purposes;
- government and regulatory authorities and other similar organisations, as required or authorised by law or as required as part of the Services; and
- such entities that we propose to merge with or be acquired by.

We may also aggregate and/or make anonymous your personal information including sensitive information to make it available for the purposes of generating statistical data for the conducting of research and improving the Services.

We are unlikely to disclose your personal information outside of Australia.

5. Emails & Marketing

In order to provide the Services to you, you agree to receiving notifications from us for the following purposes:

- notifications about activity on the Services and general updates;
- communication from us or our representatives in connection with the Services; and



- marketing and promotional messages and other information that may be of interest to you and for the purpose of direct marketing. This includes where you have signed up to our marketing or promotional newsletters.

By default you will receive these notifications to your nominated phone number and/or email address.

6. Storage & security

We use third-party cloud providers that provide hosting, data storage and other services. For information that is collected about clients' building layouts and areas, such information is stored on our third-party cloud provider Locatrix.

We take reasonable steps to ensure your personal information is secure and protected from misuse or unauthorised access. Our information technology systems are password protected, and we use a range of administrative and technical measure to protect these systems. However, we cannot guarantee the security of your personal information.

We will retain your personal information for the period necessary to fulfil the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

7. Links

Our Services may contain links to other websites. Those links are provided for convenience and may not remain current or be maintained. We are not responsible for the privacy practices of those linked websites and we suggest you review the privacy policies of those websites before using them.

8. Requesting access or correcting your Personal Information

Subject to the Privacy Act, you have a right to access and correct any personal information about you that we may hold. If you wish to request access to the personal information, we hold about you, please contact us using the contact details set out below including your name and contact details. We may need to verify your identity before providing you with your personal information. In some cases, we may be unable to provide you with access to all your personal information and where this occurs, we will explain why. We will deal with all requests for access to personal information within a reasonable timeframe.

If you think that any personal information we hold about you is inaccurate, please contact us using the contact details set out below and we will take reasonable steps to ensure that it is corrected.

If we receive a request from you to access or correct personal information we will respond to you within a reasonable time after receiving your request and in the manner requested by you, if it is reasonable and practicable for us to do so. We may charge a reasonable fee for giving access to the information.

9. If we can't collect your Personal Information

If you do not provide us with the personal information described above, some or all of the following may happen:

- we may not be able to provide our Services to you, either to the same standard or at all;
- we may not be able to fulfil our obligations to you under any contract;
- we may not be able to provide you with information about the Services that you may want; or
- we may be unable to tailor the content of our Services to your preferences and your experience of our Services may not be as enjoyable or useful.

10. Notifiable data breach

In the event that there is a data breach and we are required to comply with the notification of eligible data breaches provisions in Part IIIC of the Privacy Act or any other subsequent sections or legislation which supersede this Part IIIC, we will follow our relevant notifiable data breach procedures in compliance with the Privacy Act and relevant laws.

11. Updates

This Privacy Policy may be updated by us from time to time, and the updated Privacy Policy will apply from the date it is published on our website or otherwise communicated to you. Each time you use our website you should revisit this Privacy Policy and familiarise yourself with any changes. Continued use of our Services (including our website) shall indicate your acceptance of any changes.

12. Enquiries, requests & complaints

Enquiries regarding this Privacy Policy or the personal information we may hold on you, should be addressed with our Privacy Officer.

If you think your personal information, held by us, may have been compromised in any way or you have any other privacy related complaints or issues, you should also raise the matter with our Privacy Officer.

We will ensure your claims are investigated and a formal response will be provided to you, within a reasonable time, considering the circumstances of your claims. If any corrective action is determined to be required, as a result of that investigation, we will take all reasonable steps to rectify the situation and advise you of such, again within a reasonable time considering the circumstances.

If we do not resolve your enquiry, concern or complaint to your satisfaction or you require further information in relation to any privacy matters, please contact the Office of the Australian Information Commission, whose contact details are below.

Office of the Australian Information Commission

Telephone	1300 363 992
Email	enquiries@oaic.gov.au
Office Address	Level 3, 175 Pitt Street, Sydney NSW 2000
Postal Address	GPO Box 5218, Sydney NSW 2001
Services	www.oaic.gov.au

Contacting us

Entity	FireReady Australia Pty Ltd ABN 38 657 470 052
Contact	Please use the contact details found on our website.