

# FLUX Privacy Policy

SLC3 PTY LTD

We firmly believe that protecting your personal information is important. Not just out of respect for you but as a limit on the power held by governments and the private sector. This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or otherwise collected by us, offline or online, including through our services, our website and mobile application (**Services**). In this Privacy Policy **we, us** or **our** means **SLC3 PTY LTD** (ABN: 53 622 803 712).

## Personal information

The types of personal information we may collect about you include:

- your name;
- images of you (as provided by you);
- your email address and telephone number;
- your credit card or payment details;
- your preferences and/or opinions;
- information you provide to us through customer surveys;
- your sensitive information as set out below;
- details of products and services we have provided to you and/or that you have enquired about, and our response to you;
- your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour;
- information about your access and use of the Services, including through the use of internet cookies, your communications with our online Services, the type of browser you are using, the type of operating system you are using and the domain name of your internet service provider;
- additional personal information that you provide to us, directly or indirectly, through your use of the Services, associated applications, associated social media platforms and/or accounts from which you permit us to collect information; and;
- any other personal information requested by us and/or provided by you or a third party.

We may collect these types of personal information directly from you or from third parties.

## Collection and use of personal information

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

- to enable you to access and use the Services, associated applications and associated social media platforms;
- to contact and communicate with you;
- for internal record keeping, administrative purposes, invoicing and billing purposes;
- for analytics, market research and business development, including to operate and improve the Services, associated applications and associated social media platforms; and
- for advertising and marketing, including to send you promotional information about our products and services and information that we consider may be of interest to you;
- to comply with our legal obligations and resolve any disputes that we may have; and
- if you have applied for employment with us, to consider your employment application.

## Disclosure of personal information to third parties

We may disclose personal information to:

- third party service providers for the purpose of enabling them to provide their services, including (without limitation) IT service providers, data storage, web-hosting and server providers, debt collectors, maintenance or problem-solving providers, marketing or advertising providers, professional advisors and payment systems operators;
- our employees, contractors and/or related entities;
- our existing or potential agents or business partners;
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;
- credit reporting agencies, courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- courts, tribunals, regulatory authorities and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;
- third parties, including agents or sub-contractors, who assist us in providing information, products, services or direct marketing to you. This may include parties located, or that store data outside of Australia; and
- third parties to collect and process data. This may include parties located, or that store data outside of Australia.

By providing us with personal information, 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. You acknowledge that some overseas third parties may not be regulated by the Privacy Act and the Australian Privacy Principles in the Privacy Act and if any third party engages in any act or

practice that contravenes the Australian Privacy Principles, it would not be accountable under the Privacy Act and you will not be able to seek redress under the Privacy Act.

## How we treat personal information that is also sensitive information

Sensitive information is a subset of personal information that is given a higher level of protection under the Australian Privacy Principles. **Sensitive information** means information relating to your racial or ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation, sexual practices or sex life, criminal records, health information or biometric information.

We will not collect sensitive information about you without first obtaining your consent.

Provided you consent, your sensitive information may only be used and disclosed for purposes relating to the primary purpose for which the sensitive information was collected, including:

- providing services for a purpose that is directly related to the primary purpose for which the sensitive information was collected;
- data analytics purposes; and
- referring you to medical or health service providers in circumstances where it is impractical for us to obtain your consent.

Sensitive information may also be used or disclosed if required or authorised by law.

## Your rights and controlling your personal information

**Your choice:** Please read this Privacy Policy carefully. If you provide personal information to us, you understand we will collect, hold, use and disclose your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us, however, if you do not, it may affect your use of the Services.

**Information from third parties:** If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

**Anonymity:** Where practicable we will give you the option of not identifying yourself or using a pseudonym in your dealings with us.

**Restrict and unsubscribe:** To object to processing for direct marketing/unsubscribe from our email database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

**Correction:** If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to promptly correct any information found to be inaccurate, incomplete, misleading or out of date.

**Complaints:** If you wish to make a complaint, please contact us using the details below and provide us with full details of the complaint. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take in response to your complaint. You also have the right to contact the relevant authority in the country in which you are based.

## Storage and security

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

We cannot guarantee the security of any information that is transmitted to or by us over the internet. The transmission and exchange of information is carried out at your own risk. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that the personal information we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

## Cookies and web beacons

We may use cookies on our online Services from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do allow third parties, such as Google and Facebook, to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. If and when you choose to provide our online Services with personal information, this information may be linked to the data stored in the cookie.

We use the following cookies:

- Strictly necessary cookies. These are cookies that are required for the operation of our online Services. They include, for example, cookies that enable you to log into secure areas of our online Services, use a shopping cart or make use of e-billing services.
- Analytical/performance cookies. These are cookies that allow us to recognise and count the number of visitors to our online Services and to see how visitors move around our online Services when they are using them. This helps us to improve the way our online Services work, for example, by ensuring that users find what they are looking for easily.
- Functionality cookies. These are used to recognise you when you return to our online Services. These cookies enable us to personalise our content for you and remember your preferences (for example, your choice of language or region).

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our online Services.

We may use web beacons on our online Services from time to time. Web beacons (also known as Clear GIFs or pixels) are small pieces of code placed on a web page to monitor the visitor's behaviour and collect data about the visitor's viewing of a web page. For example, web beacons can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page.

## Links to other websites

Our Services may contain links to other websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

## Amendments

We may, at any time and at our discretion, vary this Privacy Policy by publishing the amended Privacy Policy on our website. We recommend you check our website regularly to ensure you are aware of our current Privacy Policy.

For any questions or notices, please contact our Privacy Officer at [privacy@flux.qa](mailto:privacy@flux.qa)

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