

# **Privacy Policy**

Published 1<sup>st</sup> June 2021

### **Our Privacy Policy**

DigiFish Pty Ltd has endeavoured to write a privacy Policy that uses plain language, avoiding technical or legal jargon, and that describes how we collect personal information about Consumers, what information we collect, the purposes for which Personal Information is collected and how it is disclosed.

### About Us

DigiFish Pty Ltd (DigiFish) does not collect Personal Information directly from you the Consumer. DigiFish Pty Ltd contracts with Contributors to utilise their Consumer data assets where you the Consumer have allowed your information to be passed to third party businesses like DigiFish Pty Ltd.

### Understanding Our Contributors.

Our Contributors of three types of businesses, these include online mobile device driven location data collectors, offline opt-in lead generation data collectors and offline attribute data at address and person level collectors.

In reference to our Contributors when we refer to DigiFish Pty Ltd collection practices below we are referring to our Contributors collectively.

### What DigiFish Requires From Its Contributors?

DigiFish Pty Ltd contracts with Contributors such that they warrant:

- The Consumer records are collected in compliance with the Australian Privacy Act 1988.
- The Consumer consented / opted-in such that their details can be utilised to fulfil DigiFish Pty Ltd Use Cases.
- The Consumer consented / opted-in such that their details can be provided to third party organisations downstream like DigiFish Pty Ltd.
- The Consumer consented / opted-in such that their details can be provided to Third Party Organisations outside Australia.
- The Contributors have a robust and effective Consumer opt-out process from the Consumer and to and from DigiFish Pty Ltd.
- The Consumer has been informed of the Contributors opt-out process.
- The Contributors have a data breach policy.
- The Contributors consent to the DigiFish Pty Ltd Privacy compliance attestation audit.

### We Comply With The Law.

DigiFish Pty Ltd is bound by the Federal Privacy Act 1988 and the National Privacy Principles (NPPs). We follow strict procedures for the storage and disclosure of information which Contributors give us to prevent unauthorised access and comply with all in country legislation.

### What Personal Information Does DigiFish Hold?

The type of personal information that DigiFish Pty Ltd holds includes (but is not limited to) personal information about:

- Consumers Direct title, name, date of birth, gender
- Consumers Contact Details address, landline, mobile, email
- Consumer Preferences opted in preferences declared by Consumers
- Mobile Device opted in device movement data
- Address level Consumer attributes such as home valuation etc.

### How DigiFish Might Use and Disclose Consumer Personal Information?

DigiFish Pty Ltd may only use Consumer personal information as agreed to by the Consumer with the DigiFish Pty Ltd Contributors at the point of its collection.

This includes the following purposes depending on the Consumer opt-in status:

• To send you directly or via promoters, customers, and affiliates (together, our partners), who may also share your information with their service providers and partners (together, their partners),



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advertising information, offers and promotions about products and services based on your preferences and any surveys, offers or prize notifications (Offers) by offline mail, phone/SMS/MMS, or email and online.

- To enable brands and advertisers you select to communicate with you.
- To create insights, directing and addressing campaigns, validating, modelling, data matching and aggregating information with other information obtained from other sources and parties.
- The provision of services and making offers otherwise related to the provision, sending, delivery targeting and facilitating advertising, promotional and direct marketing campaigns to you.
- Appending the information to databases for the purposes of linkage and profiling for digital marketing and campaign purposes.
- Linkage of data, files, records and other information, platforms delivery channels to other data, files, records and information, platforms delivery channels.
- To administer our database of personal information including improving and personalising offers, verifying, and assessing your identity, maintaining, and updating records, developing new products and services.
- To provide information to third parties to enable them to give you offers and additional information.
- Additional Information Disclosure:
- We may from time to time need to disclose certain information, which may include your personal information, to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, during a legal proceeding or in response to a law enforcement agency request.

### **Management & Security Of Personal Information**

DigiFish Pty Ltd takes reasonable steps to keep your personal information secure. DigiFish Pty Ltd maintains physical security over paper and electronic data storage. Personal information about Consumers is stored on servers that sit behind a firewall and is physically housed within a secure data centre.

### **Accessing Personal Information**

Consumers may request a copy of the personal information that DigiFish Pty Ltd holds about them by contacting our Privacy Officer in writing at the email address set out below.

hello@digifish.com.au

### **Updating Your Personal Information**

DigiFish Pty Ltd endeavours to ensure that the personal information it holds about Consumers is accurate, complete and up to date. Please contact us if the information we hold about you requires changing or is out of date in writing at the email address set out below.

hello@digifish.com.au

### **Removing Your Personal Information**

You can remove your personal Information at any time by making a request to us. We will also provide your removal request to any Partner we have shared your data with. We also require our Contributors and Partners to inform us if you have requested your information removed through them. Please contact us in writing at the email address set out below.

hello@digifish.com.au

#### **Your Privacy Matters**

If you believe that DigiFish Pty Ltd has not adhered to this privacy policy at any time, please contact or our Privacy Officer in writing at the email address set out below and we shall use reasonable endeavours to correct any problem.

hello@digifish.com.au

### **Privacy Policy Modification**

DigiFish Pty Ltd reserves the right to modify this privacy policy at any time without notice. The latest privacy policy will apply at all times.