



Jonas Leisure Group Privacy Policy

We value your privacy

Protecting your privacy and keeping your personal information confidential is very important to us. We're bound by the Privacy Act 1988, including the Australian Privacy Principles (APPs) set out in the Act, when we handle your personal information.

This JONAS LEISURE Group Privacy Policy (Policy) outlines how we maintain your privacy when handling your personal information if you're a client, a visitor to one of our websites or a member of the public, in Australia.

If you work for us, you can contact our human resources team for more information about how your privacy is handled internally. If you're applying for a job online with us, you can view the JONAS LEISURE Employment Relations Privacy Statement. If you're based in New Zealand, please see our JONAS LEISURE Group Privacy Policy for New Zealand

In this Policy, we use the terms, "we", "us", "our" or "JONAS LEISURE" to refer to Centaman Systems Pty Ltd and its related companies.

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1. What is personal information?

Personal information means information or an opinion that identifies you, or could reasonably identify you as an individual, whether the information or opinion is true or not.

2. The kinds of personal information we may collect from you

2.1 We only collect personal information from you that is necessary to do business with you.

2.2 The personal information that we collect about you includes your name, postal and street address, email address, telephone number, gender, age, profession/role, place of work, information relating to the complaints you've made to us and various personal preferences. We also collect your payment information, such as ABN, when you purchase a product or service from us.

2.3 Some personal information is considered 'sensitive information' under the Privacy Act. We'll only collect sensitive information about you if you give the information to us yourself, or otherwise consent to us having it.

3. **How we collect your personal information**

3.1 We collect most personal information directly from you, when you:

- a. order and/or register for a product or service;
- b. activate and use a company file, product or service;
- c. interact with our client support and sales teams;
- d. use our website, community forum or social media sites;
- e. complete a form for us, for example when you register for our competitions, training, events and newsletters;
- f. interact with members of our authorised partner and certified consultant programs;
- g. complete our surveys or product testimonials; or
- h. apply for a job with us.

3.2 We may also collect personal information about you:

- i. from our third party joint initiative partners;
- j. attend an industry event where you have given permission for your details to be shared with event sponsors or partners;
- k. that is publicly available from sources such as social media websites; and from third parties that provide us with marketing leads.

4. **How we use and disclose your personal information**

4.1 We use your personal information to:

- a. verify your identity;
- b. provide you with the products and services you've asked for;
- c. help us operate, protect, improve and develop our products and services and customise your experience;
- d. assist your authorised professional adviser (e.g your accountant or bookkeeper);
- e. provide technical support to you and your authorised contacts;
- f. keep you informed about our products and services and those of our relevant business and joint initiative partners, and tailor this information to your needs and interests;
- g. enable secure access to our websites;
- h. participate in any third party acquisition or potential acquisition of an interest in us or our assets;
- i. respond to any feedback, queries or complaints; and
- j. fulfil any legal and regulatory obligations; and
- k. process a job application that you've submitted.

4.2 Disclosure to third parties

- l. We may provide your personal information to our related companies and to third party service providers that we outsource functions to or partner with, in certain limited situations where it's necessary for us to do so in order to provide our products and services or perform associated business activities.
- m. These third parties assist us by performing functions such as client contact, auditing, professional advisory, data processing, marketing and advertising, data analysis, business intelligence, website and technology services. They may also provide products and services that integrate with or complement our solutions.

- n. Each of the third parties that we contract with is carefully selected and is only authorised to use your personal information in a secure way that's necessary for them to perform their service to us.
- o. Some of our related companies and third parties that we share information with may be located outside of New Zealand, in the United States, Canada, Australia and other countries.
- p. We'll also disclose your personal information if we are required by law or permitted by the Privacy Act to do so.

4.3 Aggregated data

- q. Aggregated data is general data about groups of people which doesn't personally identify you or anyone else, for example – the number of people that use a product in a particular industry. We use aggregated data to:
 - i. help us to understand how you use our products and services and improve your customer experience;
 - ii. tailor the way that we communicate with you about our products and services so that we can interact with you more effectively; and
 - iii. create helpful insights for the business community.
- r. We sometimes share aggregated data with our business or industry partners.

5. **Holding your personal information and keeping it safe**

5.1 We typically hold the personal information that we collect either on electronic databases or as hard copy documents.

5.2 The security of your personal information is fundamental to the way that we do business. We take all reasonable steps to protect the personal information that you give us from unauthorised access, use or disclosure, in line with industry standards.

5.3 We do this by employing a range of security measures to protect the personal information that we hold. For example our web pages that request sensitive information may employ encryption technologies such as Secure Sockets Layer (SSL).

5.4 You can confirm that a data-entry page uses encryption by checking that:

- a. the page address in the web browser's tool bar or status bar begins with https://; or
- b. the padlock icon in the web browser's tool bar or status bar is locked.

5.5 If you're a registered user of any of our websites, you can control access to your account with a username and password of your choice. You should choose a strong password and keep it protected from others to prevent unauthorised access.

5.6 We're also committed to protecting your information offline. All of your personal and business information, not just personal information and sensitive information, is subject to access controls.

5.7 Whilst we take all reasonable measures to protect your personal information when it's in our hands, it's important to note that we're unable to guarantee the security of the internet as a whole. If you're using your product and service online, please ensure that you're doing so in a secure environment. In addition, if you use email to send and receive your personal information, please be aware that the information may be less secure in transit.

6. **Our product promotion and how to opt out of direct marketing**

- a. We may use your personal information to contact you about product upgrades and releases. We may also use your personal information to let you know about new services and special offers that may be relevant to your business.
- b. If you don't want us to use your personal information for marketing purposes, you can let us know at any time through one of the following channels:
 - i. to opt out of email marketing click the 'unsubscribe' link at the bottom of any of our marketing communications.

7. Our websites

7.1 Accessing our websites

- a. Our websites contain many useful services, and we're constantly making changes and improvements to provide you with an even better website experience and to help your business succeed.
- b. Your personal information gives you authorised access to our websites so that you can update your details, access online help or perform financial transactions. For some products, you may be able to authorise other people (such as your employees) to access, add and manage information on your behalf.
- c. Our websites may contain links to third party websites, which don't belong to us and are beyond our control. Please note we're not responsible for and can't guarantee the privacy of these third party websites.

7.2 Cookies

- d. We use Internet Protocol (IP) addresses to analyse trends, administer our websites, track your navigation among JONAS LEISURE web pages and gather broad information for aggregate use. Our web servers may also send a small data file known as a "cookie" to your internet browser or hard drive. We use cookies to track your onsite behaviour to ensure transaction pages, such as "shopping cart" interactions and support pages, work correctly. We also use cookies to personalise and improve your experience with us. Most cookies don't collect personal information and only contain coded information that can't be used by third parties to access your confidential information. Most web browsers allow you to adjust settings to erase cookies, disallow cookies, or receive a warning before a cookie is set. Please note that some parts of our websites may not function fully if you disallow cookies.
- e. In some cases we or third parties may use cookies and other technologies such as web beacons and JavaScript on our websites in connection with online services like banner advertising, website analytics and surveys. These technologies enable information to be collected about your use of our websites (including your computer's IP address), which may be stored in the United States, Singapore, New Zealand or other countries. The information collected by these technologies give us and third party collectors the ability to deliver customised advertising content, measure advertising effectiveness, evaluate the use of our websites and other websites and provide other services relating to website activity and internet usage. We and third parties may also transfer collected information to others if required by law, or where those other parties process the information on our behalf. The services we may use from time to time include Google Analytics, Google AdSense, DoubleClick, Yahoo, Adobe, Bing, Kenshoo, Microsoft, Segment and Keen.

8. Your right to access and correct your personal information

8.1 If you've provided us with personal information, you have a right to request to access or correct it. You can contact us with your request by using the contact details at the bottom of this Policy.

8.2 We'll respond to you as soon as we're reasonably able to. In some cases we might ask you to pay an administrative fee to cover costs associated with your request. To help us respond to you, please include as much detail as possible about the information that you want to access or correct and, if applicable, how you'd like to access the information.

8.3 We'll provide you with a copy of or details of your personal information wherever possible.

8.4 In some circumstances we might not be able to give you access to the personal information that you have requested, or we may refuse to correct your personal information. In either of these situations, we'll let you know the reasons for our decision in writing. If we don't allow you to access or correct your personal information, and you don't agree with our decision, you can make a complaint by following the process outlined in section 9.

9. Questions, concerns and complaints

9.1 If you have a complaint about how we've handled your personal information, you can make a complaint by contacting us using the details at the bottom of this Policy.

9.2 Once we have received your complaint, we will investigate and respond to you as quickly as possible. We'll try to resolve your complaint as quickly as possible, and in any event within 30 days of

hearing from you. If your complaint takes longer to resolve, we'll keep you informed of our progress with the investigation.

9.3 If you need further information about our privacy complaints process or the progress or outcome of any investigation, please contact the Privacy Officer using the details at the bottom of this Policy.

If you aren't satisfied with our handling or resolution of your complaint, you can lodge a complaint with the Office of the Australian Information Commissioner ("OAIC"). For more information please visit the [OAIC website](#).

10. **Changes to this Privacy Policy**

10.1 We may make changes to this Policy from time to time. Please check our website regularly for any updates to this Policy. You can also get a copy of the most current version of this Policy by either emailing or writing to the Privacy Officer using the contact details set out below.

10.2 By continuing to use our website and otherwise deal with us, you accept this Policy as it applies from time to time.

Contacting Us

Email: feedback@jonasleisure.com.au

Post:

Privacy Officer
JONAS LEISURE Group
PO Box 112364
Penrose
Auckland

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