

WEBCARE PRIVACY POLICY

We understand that protecting your personal information is important. This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or otherwise collected by us when providing our web-based management system and data storage services (**Services**). This Privacy Policy applies to Webcare Services Pty Limited (ABN 38 612 466 430) and Webcare Limited (NZBN 9429033574097) (**we, us or our**).

We operate in multiple jurisdictions, currently Australia and New Zealand, and are bound by the respective privacy laws in those jurisdictions. In New Zealand, this includes the New Zealand Privacy Act 2020 and the information privacy principles set out in that Act; and in Australia, this includes the *Privacy Act 1988* and the Australian Principles set out in that Act.

Personal information

For the purposes of this Privacy Policy, “personal information” is information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable.

The personal information we collect

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

- your name;
- images of you;
- your contact details, including email address, mailing address, street address and/or telephone number as well as your next of kin details;
- your age and/or date of birth;
- your credit card or payment details (through our third party payment processor), payroll details and taxation information;
- your preferences and/or opinions;
- information you provide to us through customer surveys;
- details of products and services we have provided to you and/or that you have enquired about, and our response to you;
- information provided through service referral details and any other third-party providers;
- 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 our 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 our 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.

Client Information: When a user uses our Services, they may provide personal information about you (as a client of theirs), which could include sensitive information (such as health information, gender or ethnic origin, religion or biometric information). All users collect such personal information from you in accordance with their own privacy policies and we are not responsible for the privacy or security practices of our users.

We do not actively request sensitive information about you but in providing our Services, there may be times where we see your sensitive information (for example when we provide system maintenance, releases, updates, bug fixes and data backups). If at any time we need to collect sensitive information about you, unless otherwise permitted by law, we will first obtain your consent and we will only use it as required or authorised by law.

How we collect personal information

We collect personal information in a variety of ways, including:

- **Directly:** We collect personal information which you directly provide to us, including when you sign up for our Services, enter details onto our web-based system, applications or platforms, through the 'contact us' form on our website or when you request our assistance via email or over the telephone.
- **Indirectly:** We may collect personal information which you indirectly provide to us while interacting with us, such as when you use our website, support system, applications, in emails, over the telephone and in your online enquiries.
- **From third parties:** We may collect personal information from third parties, such as when a user inputs Client Information into the Services, for the purposes of using the Services. We may also collect details of your use of our website from our analytics and cookie providers and marketing providers. See the "Cookies" section below for more detail on the use of cookies.

Note: If we collect 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 the required authority (i.e. you are their parent or legal guardian) or you have such person's consent to provide the personal information to us.

Collection and use of personal information

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

- to enable you to access and use our Services, including to provide you with a login or to access our web-based management system and cloud-based computing system;
- to provide our Services to you, including to provide you with our web-based management system and data storage services;
- to enable you to access and use our associated applications and platforms;
- to contact and communicate with you about our Services;

- for internal record keeping, administrative, invoicing and billing purposes;
- for analytics, market research and business development, including to operate and improve our Services, associated applications and associated platforms;
- to comply with our legal obligations and resolve any disputes that we may have;
- if you have applied for employment with us, to consider your employment application; and
- if otherwise required or authorised by law.

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, to us, including (without limitation) IT service providers, developers, data storage, web-hosting and server providers, debt collectors, couriers, maintenance or problem-solving 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;
- courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights; and
- third parties to collect and process data, such as Google Analytics (To find out how Google uses data when you use third party websites or applications, please see www.google.com/policies/privacy/partners/ or any other URL Google may use from time to time), Facebook Pixel or other relevant analytics businesses; and
- any other third parties as required or permitted by law, such as where we receive a subpoena.

Overseas disclosure: Where we disclose your personal information to third parties listed above, these third parties may store, transfer or access personal information outside of New Zealand or Australia (as applicable), which may not have an equivalent level of data protection laws as those in New Zealand or Australia (as applicable).

For our Australian based customers, we will only disclose your personal information to overseas recipients in countries with laws which protect your personal information in a way which is substantially similar to the Australian Privacy Principles or we will take such steps as are reasonable in the circumstances to protect your personal information in accordance with the Australian Privacy Principles.

For our New Zealand based customers, we will only disclose your personal information to overseas recipients if:

- you have authorised the disclosure after we expressly informed you that the overseas recipient may not be required to protect the personal information in a way that, overall, provides comparable safeguards to those in the New Zealand Privacy Act;

- we believe the overseas recipient is subject to the New Zealand Privacy Act;
- we believe that the overseas recipient is subject to privacy laws that, overall, provide comparable safeguards to those in the New Zealand Privacy Act;
- we believe that the overseas recipient is subject to privacy laws in a prescribed country or a participant in a prescribed binding scheme; or
- we otherwise believe that the overseas recipient is required to protect your personal information in a way that, overall, provides comparable safeguards to those in the New Zealand Privacy Act (for example pursuant to a data transfer agreement entered into between us and the overseas recipient).

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 and the applicable privacy laws. You do not have to provide personal information to us, however, if you do not, it may affect our ability to provide our Services to you and your use of our 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.

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.

Access: You may request access to the personal information that we hold about you. An administrative fee may be payable for the provision of such information. Please note, in some situations, we may be legally permitted to withhold access to your personal information.

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, out of date, incomplete, irrelevant or misleading. Please note, in some situations, we may be legally permitted to not correct your personal information but you can ask who has entered your data.

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 Office of the New Zealand Privacy Commissioner or the Office of the Australian Information Commissioner, as is applicable to you.

Storage and security

We store your personal information in New Zealand or Australia, depending on where you are located. 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.

While we are committed to security, 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.

Cookies

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. 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.

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.

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:

Webcare Limited NZBN 9429033574097

Address : 2/41 Sir William Pickering Drive, Christchurch, 8053, NZ

Phone : 0508 932227

Email: privacy@webcare.services

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