

Privacy Policy

Last updated: 02 October 2019

Purpose of this Privacy Policy

In this Privacy Policy, ‘**Bison A/X**’, ‘us’ ‘we’ or ‘our’ means **The Bowenvale Group Pty Ltd, trading as Bison A/X, ACN: 621 552 994** and our related bodies corporate. We are committed to respecting your privacy. Our Privacy Policy sets out how we collect, use, store and disclose your personal information. We are bound by the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) (the **Privacy Act**).

This Privacy Policy applies to personal information that we collect or receive from third parties, including our clients and service providers. In circumstances where we have collected or received personal information from a third party, we rely on our client to obtain any necessary consents before disclosing any information to Bison A/X . Notwithstanding this, we have in place practices and procedures to satisfy ourselves that any necessary consents have been correctly and properly obtained by our clients. This may include obtaining and reviewing our clients’ privacy policies, making reasonable enquiries with our clients about their permitted use of personal information they hold on individuals, and obtaining contractual promises from our client that we are using any information received from a client in a manner that is consistent with an individual’s consent.

In addition, by providing personal information to us, you consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy and any other arrangements that apply between us. We may change our Privacy Policy from time to time by publishing changes to it on our website. We encourage you to check our website periodically to ensure that you are aware of our current Privacy Policy.

What is Personal Information?

Personal information includes information or an opinion about an individual that is reasonably identifiable. For example, this may include your name, age, gender, postcode and contact details. It may also include financial information, including credit card information.

Use and Disclosure of Personal Information

We only use personal information for the purpose for which it was given to us. We will only use personal information if it is reasonably necessary for one or more of our functions and activities. Such uses primarily include:

- to provide, maintain, improve or develop the services we offer to our clients, which include undertaking analysis, optimisation, research and statistical analysis. In this instance, we will only disclose personal information to the client that provided it, or as required by law,
- to maintain contact with our clients, to keep our clients informed of our products and services, to keep our clients updated on industry developments, seminars and other events that may be of interest to them and to undertake business to business direct marketing activities;

- for recruitment, employment, business operations and administration;
- to enable us to undertake essential administrative and operational tasks, including recruitment, website analytics and optimisation;
- to operate, protect, improve and optimise our services, business and our users' experience, such as to perform analytics, conduct research and for advertising and marketing;
- to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties; and
- to consider your employment application.

What personal information do we collect and receive?

We receive the following types of personal information from our clients:

- name;
- mailing &/or street address;
- email address;
- telephone number and other contact details;
- age or date of birth;
- credit card information;
- telephonic activity records

We may also collect these types of personal information either directly from you, or from third parties, when you:

- communicate with us through correspondence, chats, email, or when you share information with us from other social applications, services or websites;
- interact with our sites, services, content and advertising;
- invest in our business or enquire as to a potential purchase in our business; or
- when you apply for a job or position with us we may collect certain information from you (including your name, contact details, working history and relevant records checks), from any recruitment consultant, your previous employers and others who may be able to provide information to us to assist in our decision on whether or not to make you an offer of employment or engage you under a contract.

In addition, we may, in limited circumstances, receive personal information (including sensitive information), of a kind not listed above, from our clients in the course of providing services to them.

To whom do we disclose your personal information?

We may disclose personal information for the purposes described in this privacy policy to:

- To provide, maintain, improve or develop the services we offer to our clients, which include undertaking analysis, optimisation, research and statistical analysis. In this instance, we will only disclose personal information to the client that provided it;
- bodies corporate;
- third party suppliers and service providers in connection with providing services to our clients;
- professional advisers, dealers, business partners and agents;

- anyone to whom our assets or businesses (or any part of them) are transferred;
- specific third parties authorised by you to receive information held by us; and/or
- other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law; and/or

Direct marketing

Bison A/X does not engage in business-to-consumer direct marketing; however, where we use personal information for the purposes of business-to-business direct marketing, we rely on the exception in the Privacy Act to do so. We will comply with APP 7 and the Spam Act 2003 (Cth) in relation to any direct marketing by us, including:

- allowing an individual to opt out of receiving any further direct marketing from us; and
- in each written communication from us, setting out our business address, telephone number and, if the communication with that individual is made by electronic means, a number or address at which we can be directly contacted electronically.

Cross-Border Disclosure of Information

Bison A/X is primarily an Australian business; however, we may disclose personal information about an individual to an overseas recipient if:

- The information was provided to Bison A/X by an overseas entity, and the return of this information enables the delivery of our services to the providing entity;
- A service provider to Bison A/X is based overseas, in this case the amount of personal information will be minimised, and the remainder anonymised as far as is possible whilst permitting the service provider to complete their assigned tasks;
 - As of 02-October-2019 Bison A/X has not disclosed any personal information to any overseas service providers.

Using our website and cookies

We do not collect personal information about you when you use and access our website.

Security

We may hold your personal information in either electronic or hard copy form. We take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure and we use a number of physical, administrative, personnel and technical measures to protect your personal information. However, we cannot guarantee the security of your personal information.

Links

Our website may contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated

otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, so we encourage individuals to read them before using those websites.

Accessing or correcting your personal information

You can access the personal information we hold about you by contacting us using the details below. Sometimes, we may not be able to provide you with access to all of your personal information and, where this is the case, we will tell you why. We may also need to verify your identity when you request your personal information. If you think that any personal information we hold about you is inaccurate, please contact us and we will take reasonable steps to ensure that it is corrected.

Making a complaint

If you think we have breached the Privacy Act, or you wish to make a complaint about the way we have handled your personal information, you can contact us using the details set out below. Please include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint within a reasonable period of time. If you think that we have failed to resolve the complaint satisfactorily, we will provide you with information about the further steps you can take.

Contact Us

For further information about our Privacy Policy or practices, or to access or correct your personal information, or make a complaint, please contact us using the details set out below:

Blair Lublow, Privacy Officer
Bison A/X, Level 2, 11 York Street, Sydney 2000, Australia
privacy@bisonax.com

If you are unhappy with the outcome of a privacy complaint you have made to Bison A/X, you may contact:

Office of the Australian Information Commissioner
Phone: 1300 363 992
Email: enquiries@oaic.gov.au
Post: GPO Box 5218, Sydney, NSW 2001

Further information is available here:
<https://www.oaic.gov.au/about-us/contact-us>