

1. GENERAL

- 1.1 The products and services are provided, and the <http://www.url.net.au> website (**site**) is operated by URL Networks Pty Ltd (ACN 122 756 138) (**we, us or our**).
- 1.2 We are bound by the Australian Privacy Principles set out in the Privacy Act 1988 (Cth) (**Privacy Act**). Your privacy is very important to us and we will always act to protect your personal information. We take this responsibility seriously and are very careful about how and when your personal information is collected, used and shared.
- 1.3 By using, browsing or accessing the site or by signing up as a customer either online or by telephone, you indicate that you have read, understood and accept this Privacy Policy and you agree to abide by it. Access to our products, services or site is conditional on your approval of this Privacy Policy and you agree that your use of our products, services or site implies your consent to the terms of this Privacy Policy.
- 1.4 We do not wish to collect information about visitors which is **sensitive information** as defined under the Privacy Act. We are committed to the protection, privacy and security of your personal information and we have developed this Privacy Policy in line with the Australian Privacy Principles in the Privacy Act.
- 1.5 This Privacy Policy applies in general terms to the collection, storage, use and disclosure by us of your personal information, how you may access personal information that we keep or complain about a suspected privacy breach.

2. WHAT PERSONAL INFORMATION DO WE COLLECT?

- 2.1 We collect and use personal information from customers, users, authorised contacts, account holders or visitors of our site, including information or opinions which are capable of identifying visitors (**Personal Information**). The type of Personal Information that we collect and use depends on the type of dealings that you have with us and includes:
- (a) your name;
 - (b) company name;
 - (c) company details;
 - (d) address;
 - (e) service phone number;
 - (f) contact phone number;
 - (g) fax number;
 - (h) email address;
 - (i) information about the goods or services you have ordered;
 - (j) information from enquiries you have made;
 - (k) communications between us;
 - (l) billing information (such as credit card and bank account details);
 - (m) domain name;

- (n) photographic identification;
- (o) proof of residential address;
- (p) method of payment; and
- (q) mobile phone numbers for the purpose of SMS password reminders or password resets; and
- (r) information for security questions (ie date of birth, first school attended and mother's maiden name).

3. COLLECTING YOUR PERSONAL INFORMATION

- 3.1 We will collect Personal Information about you in a variety of ways, including:
- (a) through your use, or orders of, of our products and services (and our records thereof); when you visit our site or submit information through our site, contact us with a query or request information about products and services, complete any forms or agreements for our products or services, participate in surveys, competitions or promotional events;
 - (b) from third parties (including our related bodies corporate, business partners and service providers, credit reporting bodies and government agencies);
 - (c) from publicly available sources of information (including, but not limited to, social media sites); and
 - (d) when legally authorised or required to do so (such as when we need to comply with the data retention provisions of the Telecommunications (Interception and Access) Act 1979 (Cth) and the identity-checking requirements for pre-paid mobile services under the Telecommunications (Service Provider –Identity Checks for Prepaid Mobile Carriage Services) Determination 2013.
- 3.2 We do not use or share Personal Information for any purpose other than for the purpose for which it was disclosed. We will only collect Personal Information that is necessary for one or more of our functions or for the purpose disclosed to you. The Personal Information collected by us will track your use, or enhance your use, of the foregoing and assist us in providing a better service.
- 3.3 If you provide to us Personal Information about someone else (as their authorised representative), we rely on you to inform them that you are providing their Personal Information to us and to advise them that we can be contacted for further information. You must take reasonable steps to ensure the individual concerned is aware of and consents to the various matters detailed in this Privacy Policy, including the fact that their Personal Information is being collected, the purposes for which that information is being collected, the intended recipients of that information, the individual's right to obtain access to that information, our identity, and how to contact us. Where requested to do so by us, you must also assist us with any requests by the individual to access or update the Personal Information you have collected from them and provided to us.

4. USE OF YOUR PERSONAL INFORMATION

- 4.1 We use your Personal Information for the purposes for which the information is collected.
- 4.2 We use your Personal Information to provide our products, services and site to you. We also use it to improve or develop our products, service and site, to operate, maintain, test and upgrade our systems and to notify you of opportunities that we think you might be interested in.
- 4.3 We may provide your Personal Information to our related bodies corporate, business partners, URL Networks' Affiliates, service providers, sponsors, third party contractors, agents or suppliers and authorised third party service providers who perform functions on our behalf, such as marketing and analysis organisations, financial and credit card institutions in order to process any payments, hosting companies, web developers, internet service providers, telecommunication providers, customer service providers, customer support specialists, fulfilment companies, external business advisors (such as auditors and lawyers), research and data analysis firms, debt collection and insurers (**Authorised Affiliates**). In all circumstances where your personal information is disclosed, we will ensure that these third parties undertake to protect your privacy.
- 4.4 We may also use your Personal Information to:
- (a) provide or deliver our products and services to you;
 - (b) administer and manage our products and services;
 - (c) inform you about our site, products, services, offers, competitions, promotions, service outages and scheduled and unscheduled maintenance or surveys or other matters which we believe are of interest to you;
 - (d) charge and bill you for the use of our products and services;
 - (e) customise the advertising and content on our site and to contact you about specials deals;
 - (f) provide offers that are of greater interest or benefit to you;
 - (g) share with Authorised Affiliates;
 - (h) verify your identity;
 - (i) conduct creditworthiness and fraud checks; and
 - (j) perform research and analysis.
- 4.5 We may disclose Personal Information to an Authorised Affiliate and they may in turn provide us with Personal Information collected from you.
- 4.6 Our Authorised Affiliates may be located both in and outside Australia. In particular, as at the date this Privacy Policy was most recently updated, your Personal Information may be disclosed to recipients in New Zealand and the United States of America and other countries from time to time. If you subsequently decide that you do not wish to receive information from them you may let us know by contacting support@url.net.au.

- 4.7 Prior to the disclosure of Personal Information to a person overseas, we will take such steps as reasonable in the circumstances to ensure that the overseas recipient treats your Personal Information securely and otherwise complies with the relevant Australian Privacy Principles in relation to the Personal Information.

5. STORAGE AND SECURITY OF YOUR PERSONAL INFORMATION

- 5.1 Your Personal Information may be stored in storage facilities (owned and operated either by ourselves or our services providers) in hard copy or electronic format. We will use our reasonable endeavours to store your Personal Information securely and to make our sites and storage facilities as secure as possible against unauthorised access. In relation to processing your credit card information (if applicable) we use a secure third party gateway system. When your credit card details are added to our database and the first payment is made from it, we add the details to our merchant's gateway system and they in turn provide us with a 'token'. We then store this 'token' and use it to debit your credit card ensuring we never pass your credit card information again unless new details are supplied. We cannot decrypt the token to reveal your credit card details and the encryption process provides you with an extra protection of this Personal Information in the event that our database is ever compromised.

- 5.2 We will use our reasonable endeavours to protect and maintain the security of your Personal Information. Our officers, employees, agents and third party contractors are expected to observe the confidentiality of your Personal Information.

- 5.3 Despite our reasonable endeavours, we are unable to ensure or warrant the security of any Personal Information transmitted to us. Accordingly, all Personal Information disclosed by you to us is at your own risk and we are not liable for any unauthorised access to and disclosures of the Personal Information.

- 5.4 If we determine that Personal Information is no longer needed for any purpose, we will take reasonable steps to destroy or permanently de-identify that Personal Information, unless we are required by law or a court or tribunal to retain the information. In particular, we are required to retain some of your Personal Information for 2 years after the Personal Information was collected by us to comply with the data retention provisions of the Telecommunications (Interception and Access) Act 1979 (Cth).

6. DISCLOSURE OF PERSONAL INFORMATION

- 6.1 We may disclose any information, including Personal Information to law enforcement bodies or regulatory authorities to assist with their functions, courts of law or as otherwise required or authorised by law.

- 6.2 We may retain certain of our Authorised Affiliates to perform functions consistent with our Privacy Policy on our behalf. Such third parties may be provided with access to Personal Information needed to perform their functions, but may not use such information for any other purpose.

- 6.3 In the event of a merger, acquisition or sale of the whole or part of our business or assets, we reserve the right to transfer your Personal Information as part of any such transaction. However, your Personal Information would remain subject to this Privacy Policy.

7. DIRECT MARKETING

- 7.1 Where we have your express or implied consent, or where we are otherwise permitted by law, we may use your Personal Information to send you information about the services we offer, as well as other information. We may send this information in a variety of ways, such as by mail, email, SMS telephone, social media or by customising online content and displaying advertising on our websites.
- 7.2 If you do not wish to receive these communications, you can opt out at any time in the ways set out below and we will remove you at your request:
- (a) by contacting us by writing to URL Networks Privacy Officer, 17/31 Queen St, Melbourne, Victoria, 3000 or by email to support@url.net.au;
 - (b) by calling us on 1800 875 638; or
 - (c) by using the unsubscribe facility that we include in our commercial electronic messages (ie email or SMS) to opt out of receiving those messages.

8. LINKS TO OTHER SITES FROM OUR SITE

- 8.1 Although our site may contain hyperlinks or banner advertising to or from external websites, those websites are not subject to our privacy standards, policies and procedures. We recommend that you make your own enquires as to the Privacy Policies of these third parties.
- 8.2 We are in no way responsible for the privacy practices of these third parties.
- 8.3 This Privacy Policy applies only to the information we collect on our site.

9. DISCLAIMER

- 9.1 We will not disclose your Personal Information to any third party (other than our Authorised Affiliates) without your consent in writing, unless otherwise required by law or permitted herein, or unless such disclosure is reasonably necessary in our opinion to protect our rights or property, to avoid injury to any person or in order to ensure the proper functioning of our site.
- 9.2 This Privacy Policy only addresses the use and disclosure of information we collect from you via our site, via our account establishment process or as otherwise permitted in this Privacy Policy. The use of your Personal Information by the aforementioned third parties is governed by the privacy policies of such parties and is not subject to our control.
- 9.3 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to our site; any transmission is entirely at your own risk.

- 9.4 We will advise you at the first reasonable opportunity upon discovering or being advised of a security breach where your Personal Information is lost, stolen, accessed, used, disclosed, copied, modified, or disposed of by any unauthorised persons or in any unauthorised manner.

10. COOKIES AND IP ADDRESSES

- 10.1 A cookie is a piece of data that enables us to track and target your preferences. We may use cookies to enable us to identify you as a return user and personalise and enhance your experience and your use of our site. Most browsers are initially set up to accept cookies. You can reset your browser to refuse all cookies or to warn you before accepting cookies. If you have set your browser to warn you before accepting cookies, you will receive the warning message with each cookie. If you reject our cookies, you may still use our site, but you may be limited in the use of some of the features and this may affect the functionality of our site.
- 10.2 We use cookies to help us improve our service to you when you access our site and to ensure that our site remains easy to use and navigate. We may also use IP addresses to analyse trends, administer our sites, track traffic patterns, and gather demographic information for aggregated use, as well as in combination with your Personal Information for transaction risk reduction.

11. ACCESS TO INFORMATION COLLECTED BY US

- 11.1 We will use our reasonable endeavours to keep your Personal Information that we collect accurate, up-to-date and complete.
- 11.2 Subject to some exceptions provided by law, you have the right to access your Personal Information. If you wish to access or change Personal Information which we have collected about you, we require you to put your request in writing to us (support@url.net.au). Proof of identity may be required before such information will be provided. If we do not allow you access to any part of the Personal Information we hold about you, we will tell you why. We will not charge you for lodging a request to access your Personal Information, but we may charge you for our reasonable costs in supplying you with access to this information.

12. CONSENT

- 12.1 You acknowledge and agree that we, our Authorised Affiliates and each of their officers, employees, agents and contractors are permitted to collect, store, use and disclose your Personal Information in the manner set out in this Privacy Policy and in accordance with the Privacy Act.

13. CHANGES TO THE PRIVACY POLICY

- 13.1 We may amend this Privacy Policy from time to time. The current version of our Privacy Policy will be posted on our site and a copy may be obtained from the Privacy Officer.

13.2 Your continued use of our products, services or site following any such amendment will be confirmation of your acceptance of the amendments. We reserve the right to modify this Privacy Policy at any time, so please review it frequently.

14. FURTHER INFORMATION

14.1 Further information about Privacy law and the Australian Privacy Principles is available from the Office of the Australian Information Commissioner's website www.oaic.gov.au.

15. RESOLVING YOUR PRIVACY ISSUES

15.1 If you have any issues you wish to raise with us regarding the way we have handled your Personal Information, or would like to discuss any issues about our Privacy Policy, please contact our Privacy Officer directly by writing to the URL Networks Privacy Officer 17/31 Queen St, Melbourne, Victoria, 3000 or by email to support@url.net.au or by calling them on 1800 875 638 and please provide our Privacy Officer with full details of your complaint and any supporting documentation.

15.2 Our Privacy Officer will endeavour to:

- (a) provide an initial response to your query or complaint within 10 business days, and
- (b) investigate and attempt to resolve your query or complaint within 30 business days or such longer period as is necessary and notified to you by our Privacy Officer.