

Invigor Group Limited

(ABN 75 081 368 274)

Privacy Policy

(Last updated 27 May 2015)

- 1.1 **Invigor Group Limited**, and its related parties and associates (collectively **Invigor, we or us**) are committed to protecting all personal information that we hold.
- 1.2 This Privacy Policy (**Policy**) describes how we manage your personal information and safeguard your privacy. To assist you to easily understand our privacy practices, you should note that there are some instances where we have developed specific privacy policies for particular categories of personal information that we hold. Please see Section 16 of this Policy ("Other Privacy Policies") below for details.
- 1.3 Please read this Policy carefully. You can contact us via the contact details set out below with any questions about how we handle your personal information.
- 1.4 Please note that as our business evolves, we may need to make changes to this Policy from time to time. We may notify you about changes to this Policy by posting an updated version on this website. You should therefore check this Policy regularly. You may also contact us via the contact details below, at any time, to request a current version of this Policy.

2. Australian Privacy Principles

- 2.1 Most private sector organisations in Australia are required to comply with the Australian Privacy Principles (**APPs**).
- 2.2 Invigor is committed to implementing and maintaining suitable practices and procedures to ensure that it complies with the APPs and to enable it to deal with enquiries or complaints from individuals about Invigor's compliance with the APPs.

3. How do we collect and hold personal information?

- 3.1 Invigor holds personal information collected from its existing and prospective shareholders, contractors, job applicants, employees, and individuals who deal with Invigor in the course of Invigor's business activities, including without limitation individuals who provide products or services to Invigor or sign-up to receive products or services from Invigor and individuals who Invigor engages with in order to perform services for or provide products to its clients and industry partners.
- 3.2 Without limitation, this may include personal information that is collected through the following means:
 - our websites (see Section 5 below for further details);
 - in the course of performing services for, or supplying products to, our clients; (see Section 6 below for further details);

- social media;
- use of mobile devices;
- requests to sign-up to online products or services;
- orders for products or services;
- employment applications;
- third party service providers;
- requests for information, or to join a mailing list;
- provision of customer service and support;
- our shareholder registry;
- responses to surveys or research;
- entries into competitions or trade promotions.

3.3 If you do not provide us with the information we request, we may not be able to fulfil the applicable purpose of collection, such as to supply products or services or assess your application for employment.

3.4 This information may be held by Invigor or by a third party service provider as described in Section 10.4 to 10.6 of this Policy.

3.5 Invigor collects personal information about individuals directly from the relevant individuals, unless it is unreasonable or impracticable to do so.

3.6 If practicable, Invigor provides disclosure as required under the Privacy Act prior to, or at the time of, collection. Where this is not practicable, the disclosures are provided as soon as practicable after the time of collection. Where Invigor collects personal information about individuals from sources other than the individual themselves (for example, via Invigor's outsourced service providers), Invigor takes reasonable steps to ensure that the individual has been made aware of matters covered by disclosures required under the Privacy Act.

3.7 Some further examples of the main ways that we collect and hold personal information are set out below.

4. What kinds of personal information do we collect and hold?

4.1 The kinds of personal information we collect and hold will depend upon the circumstances in which the information is collected, your relationship with us and/or the type of products and services you supply to, or request from, us.

4.2 That personal information may include, for example:

- contact details (such as your name, address, email, phone number and other contact details);
- information you provide when you request a product or service from us or our client or industry partner or sign-up to a product or service;
- information about your employment (such as place of work, position, authority to transact with us etc);
- statistical and other information regarding your use of websites and apps, including without limitation URLs of websites visited, IP addresses, MAC addresses and other device identifiers and details of the dates and times of visits;
- geographical location information;
- information relating to your dealings with us or our clients or industry partners;
- age and information on personal lifestyle, online and other preferences and habits;
- information contained in communications that you send us (including emails and mail) as well as personal information that you provide to us when you otherwise contact us (such as in person or via telephone);
- communications between us and your financial adviser;
- if you have or had an investment in Invigor or have received a service from us, transactional information about the use of that product or service including information required for you to obtain products or services from, or provide products or services to us, and other information required for you to do business with us (including bank account details);
- information that you provide as part of, or in connection with, a job application or otherwise in connection with recruitment processes; and/or
- where you are our employee or contractor, information that we collect in the course of your employment or engagement by us.

4.3 Some further examples of the main kinds of personal information that we collect and hold are set out below.

5. Information collected when you use our websites

5.1 We may collect some information from you when you use our websites.

5.2 This will include personal information that you submit to us via the websites. Examples might include, but are not limited to: when you complete an online form such as an application form or ask for a disclosure document for our products, when you register for a newsletter, leave feedback about a website or products or services supplied via a website, partake in a

competition or complete a survey, make an enquiry or register to receive information on featured or special deals available through a website.

- 5.3 When you visit one of our websites, our server places small pieces of data known as “cookies” on your hard drive. Cookies are pieces of information that are transferred to your computer when you visit a website for record-keeping purposes. Cookies collect information that includes the server your computer is logged onto, your browser type and how you gained entry to the website. Therefore when you browse one of our websites information is recorded about that use, such as how you have used the website, the time and date of your access, the pages of the website that are accessed and the time spent on the website.
- 5.4 Most internet browsers are set to accept cookies. However, if you do not wish to receive any cookies you may set your internet browser to refuse to accept cookies. This may mean that you will not be able to take full advantage of the products and services on the website.
- 5.5 We use cookies to provide us with aggregated, anonymous, information on how people use our websites and to help us to know what our customers find interesting and useful in our websites. We do not link this information back to other information that you have provided to us.
- 5.6 Our websites may contain links to third party websites. These linked sites are not under our control and we are not responsible for the content of those sites nor are those sites subject to this Policy. Before disclosing your personal information on any other website we recommend that you examine the terms and conditions and privacy policy of the relevant site. Invigor is not responsible for any practices on linked websites that might breach your privacy.

6. Information collected in the course of performing services for our clients

- 6.1 Invigor performs a range of data analytics services for its clients (**Analytics**). This Policy applies to such services, and to information that we collect in order to carry out such Analytics. Some additional things to note about these services are specified below.
- 6.2 Insights Visitor:
- We provide our "Insights Visitor" service to clients. This involves the provision of Analytics to such clients including aggregated information and statistics regarding consumer behavioural patterns.
 - We collect data to run such Analytics via wi-fi services provided at particular premises.
 - If you sign up to such local wi-fi services in order to connect your mobile devices whilst you are in the premises, we will collect information about how your mobile device uses the wi-fi service. The information is only collected whilst your mobile device is connected to the wi-fi service. Invigor takes steps to ensure that you will be clearly notified of these collections as part of the sign-up process for such wi-fi services.
 - The information that we collect may include information that identifies your mobile device and its location within the precinct as well as information transmitted via your mobile device which identifies the webpages that you visit and apps that you use. In many instances, the information we collect will not identify you personally. However,

depending on your usage of the wi-fi service, it is possible that some identifiable details may be incidentally collected. For example, whilst we do not collect the contents of any communications that you send from your mobile device, the URLs for the webpages that you visit may contain some information that relates to you, such as search terms that you enter into a search engine.

- In addition to the purposes outlined in Section 7 below, one of our key purposes in collecting this information is to provide Analytics to our clients. Collecting this information enables us to carry out Analytics on the data to determine statistical patterns of behaviour. We may also collect this information for marketing purposes (see Section 8 below).

6.3 Passive Small Business Offering:

- We provide our "Passive Small Business Offering" service to clients. This also involves the provision of Analytics to such clients including aggregated information and statistics regarding consumer behavioural patterns.
- We collect information about consumer behaviour based on information transmitted from mobile devices within business premises.
- Any mobile devices with wi-fi capability switched on will transmit "probe requests" seeking wi-fi network connectivity access points in range. These "probe requests" contain some limited information about the device, including its MAC address, SSID requests and signal strength. We do not collect any information relating to the usage of the device or any details about the individual using it.
- By collecting this information, we are able to ascertain other information in relation to the frequency and timing of visits to the location, such as whether a device relates to a new or repeat visitor, the frequency of visits of the device to the location and how long the device remains at the location.
- In addition to the purposes outlined in Section 7 below, one of our key purposes in collecting this information is to provide Analytics to our clients. Collecting this information enables us to carry out Analytics on the data to determine statistical patterns of behaviour.

7. What are the purposes for which we collect, hold, use and disclose personal information?

- 7.1 We will only collect personal information that is necessary for one or more of our functions or for a purpose disclosed to you in this Policy, or around the time of collection of your personal information.
- 7.2 Invigor collects, holds, uses and discloses your personal information as required in order to perform its various roles as, amongst other things, a listed company, an issuer of financial products, an employer, a service provider, a customer and an investor.
- 7.3 We collect, hold, use and disclose personal information for the purposes of running our business. Without limitation, this includes the following purposes:

- to collect, hold, use and disclose shareholder information to assess applications for shares, provide information to (and respond to queries from) shareholders, keep proper company records and administer the company;
- to collect, hold, use and disclose personal information from contractors, job applicants and employees to facilitate normal employment/contractor engagement and business management and human resources functions (noting that we will not use employment related information for direct marketing purposes, or disclose such information to clients or industry partners);
- to process and assess employment applications;
- to collect, hold, use and disclose personal information from individuals involved in Invigor's business in order to facilitate the relevant business activities;
- to provide our products and services (including our online and mobile services);
- to obtain products and services from our suppliers;
- so that we can seek feedback or contact you in relation to our products and services;
- to administer, and otherwise carry out obligations in relation to, and enforce, contracts to which we are party;
- to undertake research and surveys and to create and analyse statistical information;
- to conduct competitions and trade promotions;
- to anticipate and resolve problems with our products and services;
- to enhance our service offering;
- to process and respond to enquiries and requests, improve our operations, and communicate with users about our products, services and businesses;
- for legal purposes, including so that we can meet our legal obligations including compliance with any applicable law, regulation, governmental process or industry code;
- investigating and/or cooperating with authorities in connection with legal issues, or security or law enforcement investigations; and
- to undertake a merger, acquisition or sale of the whole or part of our business or assets or other corporate restructuring.

7.4 In addition, information that we collect from investors in the financial products that we issue will be used by us:

- to assess your applications for products or services that we may provide; and
- to provide you with the products or services and related information; and
- to conduct transactions in relation to the products and services that you request we transact on your behalf.

8. Direct marketing

- 8.1 We may also use your personal information to help us develop other products and services and, with your consent or where otherwise permitted by law, to provide you with information about other products and services offered or distributed by Invigor or to provide you with information, or permit our clients to provide you with information, about other products and services including by means of direct marketing.
- 8.2 If you are receiving promotional information from us and no longer wish to receive such information, you should contact the Invigor Privacy Compliance Officer on (02) 8251 9600 during business hours or by using the unsubscribe facility that we include in our commercial electronic messages.
- 8.3 Invigor, and our advertisers, may use information we collect from you and about you to help deliver relevant ads to you when you use our, or our clients', websites.

9. Recruitment

- 9.1 If you send us an application for a position, this information will be used to assess your application. This information may be disclosed to our related parties and affiliates and service providers for purposes such as aptitude, psychological and medical testing, and other human resources management activities.
- 9.2 As part of the application process you may be asked for your specific consent to the use and disclosure of certain personal information about any pre-employment medical examination or any aptitude or psychological testing. We may also ask you to consent to the disclosure of your personal information to those people who you nominated to provide references.
- 9.3 A refusal to provide any of this information, or to consent to its proposed disclosure may affect the success of the application.
- 9.4 You may also be asked whether you agree to your personal information being provided to related parties and affiliates of Invigor for other positions relevant to your qualifications and experience.
- 9.5 If an employee or contractor is suspected of breaching Invigor's code of conduct or policies, we may disclose personal information that is collected through our IT systems to those parties investigating such a matter in order to ascertain whether a breach occurred.

10. How might we disclose your personal information?

- 10.1 We may disclose your personal information for the purposes outlined in Sections 6 to 9 above.
- 10.2 When Invigor collects your personal information, it seeks to inform you of the categories of third parties to whom your personal information is likely to be disclosed either by the information provided in this Policy or otherwise.

- 10.3 We may disclose personal information to our related parties and affiliates for the purposes outlined in Sections 6 to 9 above.
- 10.4 Please note that we contract out some of our functions (for example, registry services, mailing, and hosting service providers) to external service providers. We also obtain products and services from a range of third party service providers, including without limitation professional advisors and financial institutions.
- 10.5 We may disclose your personal information to these third party service providers but only so that they can provide relevant products or services to us, or on our behalf, or process transactions you have requested us to transact on your behalf.
- 10.6 Invigor seeks to ensure that providers of outsourced services and other third party service providers are subject to contractual provisions for the protection of personal information disclosed to them by Invigor.
- 10.7 We work to deliver a range of information products and services to our clients and work together with a range of industry partners (including, without limitation venues, websites and other businesses that obtain our services to assist them to analyse consumer behaviour and engage with consumers, as well as advertisers and marketing companies). We may disclose personal information to such entities.
- 10.8 We may also disclose personal information to law enforcement bodies, courts, dispute resolution bodies, counterparties to disputes and otherwise in connection with legal processes.
- 10.9 In the event of a merger, acquisition or sale of the whole or part of our business or assets, or other corporate restructuring, we may disclose personal information as part of that transaction.
- 10.10 It is unlikely that personal information will be disclosed to overseas recipients. However, if and when personal information is collected in circumstances where such overseas disclosures are likely, Invigor will, if practicable, outline the countries in which the overseas recipients are located.
- 10.11 Prior to the disclosure of personal information to a person overseas, we will take reasonable steps to ensure that such overseas third party undertakes to treat your personal information securely and to protect your personal information in a manner consistent with this Policy and the Australian Privacy Principles.

11. Data security

- 11.1 We will use our reasonable endeavours to store your personal information securely and to secure it against unauthorised access.
- 11.2 In particular, Invigor has taken steps to promote physical security, computer security, communications security and personnel security and staff have received appropriate training in dealing with individuals' privacy.

11.3 Despite our reasonable endeavours, you should be aware that we are unable to guarantee the security of any personal information that is transmitted to us. Accordingly, if you transmit personal information to us this is at your own risk.

11.4 If we determine that personal information is no longer needed for any relevant purpose, we will take reasonable steps to destroy or permanently de-identify that personal information, unless we are required by law to retain it.

12. Contacting us

12.1 If you wish to contact us in relation to our privacy practices, our contact details are as follows:

Attention: Invigor Privacy Compliance Officer

Telephone: (02) 8251 9600

In writing: Invigor Privacy Compliance Officer, Invigor Group Limited, Level 16, 56 Pitt Street, Sydney NSW 2000

Email: privacy@invigorgroup.com

13. Making complaints

13.1 If you wish to make a complaint about our privacy practices or a breach of Australian privacy laws (including the APPs or any applicable registered APP code) you may contact us using the contact details set out in Section 12 above. We will seek to respond to your complaint as soon as possible.

13.2 If you are not satisfied with how we resolve a complaint that you have raised, you may contact the Office of the Australian Information Commissioner. Please see Section 15 below.

14. Accessing and correcting your personal information

14.1 You have the right to seek access to the personal information we hold about you at all times. Access requests will generally be granted. However, you should note that there are some circumstances (as permitted under Australian privacy law) where access requests could be refused. We will seek to respond to access requests as soon as reasonably possible.

14.2 We will use our reasonable endeavours to keep your personal information that we collect accurate, up-to-date and complete. You may request corrections to the personal information we hold about you, by contacting us using the contact details set out above. We will take reasonable steps to appropriately correct or update the information to ensure that, having regard to the purpose for which we hold it, the information is accurate, up-to-date, complete, relevant and not misleading. We will respond to correction requests as soon as reasonably possible.

14.3 We reserve the right to charge a reasonable fee for responding to access requests to meet our reasonable costs in providing you with details of the information we hold about you. We note that there is no charge for making an access request or a correction request. We will also not charge for responding to a correction request. However, if a fee will be incurred for us providing you with access to the personal information we hold about you, we will inform you of the current fee (if any) before proceeding with processing your request.

15. Further information on privacy

15.1 You may obtain further information regarding privacy issues in Australia by visiting the Australian Office of the Information Commissioner's website at www.oaic.gov.au.

16. Other Privacy Policies

16.1 You should note that, in some cases, we have separate privacy policies that apply specifically to certain sets of personal information instead of this general Policy as follows:

- We have a separate privacy policy that applies to personal information collected through our Shopping Ninja browser extension. A copy of the Shopping Ninja Privacy Policy is available at: http://www.shoppingninja.com.au/privacy_policy.html.