

PRIVACY POLICY

We're committed to protecting your personal information and confidentiality. It's important to us and is an integral part of our service to you. We want you to feel secure whenever you deal with us and that you understand how we protect your privacy.

To safeguard your personal information, we've implemented a number of practices, procedures and systems to protect your privacy whenever we collect, hold, use or disclose your personal information.

In this Privacy Policy, any reference to "we", "us" and "our" means Neometro Pty Ltd (ACN 636 572 337) (**Neometro**) its officers, employees, volunteers, contractors and agents.

By providing personal information to us, you consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy (as amended from time to time) and any other arrangements that apply between us.

1. WHAT IS OUR COMMITMENT TO YOUR PRIVACY?

Neometro is committed to protecting and respecting your privacy.

The Privacy Policy applies to all personal information collected by Neometro via the Websites. It also sets out your rights in relation to accessing the personal information we collect and hold about you.

This Privacy Policy applies to any personal information you disclose to Neometro through the use of any of Neometro products or services on the Websites.

2. DEFINITIONS

The following terms have the following meanings: -

Cookies means a small text file that is stored on a user's computer/phone for record keeping purposes.

Information means either Personal Information or Non-personal Information.

Minor(s) means individuals below the age of 18 years.

Non-personal Information means any information that does not reveal your specific identity or does not directly relate to an individual.

Personal Information means information or an opinion about an identified individual, or an individual who is reasonably identifiable, such as:

- (a) name;
- (b) postal address or street address;
- (c) email address;
- (d) telephone number and other contact details;
- (e) age or date of birth;
- (f) your device ID, device type, geo-location information; and
- (g) such other information we deem as Personal Information.

Primary Purposes include, but are not limited to, those purposes listed in this Privacy Policy.

Secondary Purposes include the use of Information for any purpose that is not defined as a primary purpose.

Services means the services offered by Neometro to the consumer.

User means an individual or company who interacts with Neometro's services, including users of the Websites and users who purchase products or services and otherwise interact with Neometro.

Websites means <https://Neometro.com.au/> and <https://openjournal.com.au/>

3. WHY DO WE COLLECT YOUR PERSONAL INFORMATION?

We collect Personal Information for the purposes of operating our Websites and providing services and in order to provide you with a safe and efficient experience. The Personal Information we collect from you will include Information you give us when you:

- (a) express your interest in our services offered;
- (b) communicate with us through correspondence, chats, emails or when you share information with us from other social applications, services or Websites;
- (c) interact with our Websites, services, content and advertising;
- (d) provide feedback of our products and services;
- (e) engage in our promotions;
- (f) complete a transaction with us;
- (g) subscribe to our Websites; or

(h) contact us.

We may collect, hold, use and disclose your Personal Information for the following purposes:

- (a) to conform your identity;
- (b) to design, manage, price and provide our products and services;
- (c) to enable you to access and use our services and Websites;
- (d) to operate, protect, improve and optimise our service, Websites, business and our users' experience, such as to perform analytics, conduct research and for advertising and marketing;
- (e) to manage our relationship with you;
- (f) to minimise risks and identify or investigate fraud or other illegal activities;
- (g) to manage our business;
- (h) to send you service, support and administrative messages, reminders, technical notices, updates, security alerts and information requested by you;
- (i) to send you marketing and promotional messages and other information that may be of interest to you, including information sent by, or on behalf of, our business partners that we think you may find interesting;
- (j) to administer promotional activities or events sponsored or managed by us or our business partners;
- (k) to comply with our legal obligations, resolve any disputes we may have with any of our users, and enforce our agreements with third parties; and

We only collect Personal Information in circumstances where you consent to the collection of this Information, or it is reasonably necessary for, or directly related to, the purposes outlined above. However, should you refuse to disclose Personal Information to us, Neometro may be unable to provide you with the product or services you require.

4. DIRECT MARKETING

We and/or our officers, employees, volunteers, contractors and agents may send you direct marketing communications and information about our service or products. This may take the form of emails, SMS, mail or other forms of communication, in accordance with the Spam Act and the Privacy Act. You may opt-out of receiving marketing materials from us by contacting us.

5. HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

We will collect your Personal Information directly from you when you visit our Websites, deal with us over the phone or send a letter to us.

Where reasonably practicable, we attempt to collect Information directly from individuals or companies.

If Neometro holds Personal Information that was collected for a Primary Purpose, then we must not disclose the Personal Information for a Secondary Purpose unless users have consented to the use of the Personal Information or the users would reasonably expect that Neometro would use the Information for the Secondary Purpose which is directly related to the Primary Purpose.

At times, your Personal Information may be processed via a third-party plugin or integrated third party gateway provider.

If we collect Information about an individual or company from someone else, we will take reasonable steps to ensure that the individual is made aware of the matters above. In the event that Neometro receives unsolicited Personal Information, then we will, as soon as practicable but only if lawful, destroy the Information or ensure the Information is kept confidential.

In addition, 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 record 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 to engage you under a contract. This Privacy Policy does not apply to acts and practices in relation to employee records of our current and former employees, which are exempt from the Privacy Act.

6. HOW MAY PERSONAL INFORMATION BE USED?

We may use your Personal Information for Primary Purposes, including:

- (a) to provide functionality of our Services and related support, including to create and administer accounts, fulfil and record transactions, and provide you with related assistance;
- (b) to provide you with marketing and promotional materials and opportunities;
- (c) to provide administrative information to you, for example, information regarding our services and changes to our terms and conditions;

- (d) to assist our reporting and analysis of trends;
- (e) to improve our products and services;
- (f) to protect the copyright, trade marks, legal rights, property or safety of Cookies, its customers or third parties;
- (g) to accomplish our business purposes, including
 - (i) ensuring our internal processes function as intended and are compliant with legal, regulatory and contractual requirements;
 - (ii) ensuring that fraud and security monitoring purposes are effective in detecting and preventing cyberattacks or attempts to commit identity theft;
 - (iii) responding to legal duties, such as requests from public and government authorities.

To the extent that your Personal Information is based on your consent, you may withdraw such consent at any time in writing.

7. TO WHOM MAY PERSONAL INFORMATION BE DISCLOSED?

We may disclose your Personal Information:

- (a) to our employees and related bodies corporate;
 - (b) to our affiliates for Primary Purposes and Secondary Purposes.
 - (c) to third-party service providers or suppliers who provide services such as Websites' hosting, data analysis, payment processing services, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, credit card processing, auditing and other similar services;
 - (d) to professional advisers, dealers and agents;
- to third parties to permit them (or their own customers) to send you marketing communications;
- (e) to you, through message boards, chat, profile pages, blogs and other services to which you are able to post information and materials;
 - (f) to business partners in the context of a corporate transaction. If Neometro is involved in a sale or business transaction, we will retain a legitimate interest in disclosing or transferring your Personal Information to a third party in the event of reorganization, merger, sale, joint venture, assignment, transfer of other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings). Such third parties may include, for example, an acquiring or target entity and its advisors; and
 - (g) as required by law.

8. HOW TO ACCESS, CORRECT, DELETE OR EXERCISE OTHER RIGHTS REGARDING YOUR PERSONAL INFORMATION

Where permitted by law, if you would like to request to access, correct, object to the use of, restrict or delete Personal Information that you have previously provided to us, or if you would like to request to receive an electronic copy of your Personal Information for the purpose of transmitting it to another company, you may contact us and we will respond to your written request consistent with applicable law.

For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you used to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

We may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed.

If you are under 18 years of age, you may also be entitled to ask us to remove content or Information that we hold about you by contacting us. Please note that your request does not ensure complete or comprehensive removal of the content or Information.

9. WHAT HAPPENS TO NON-PERSONAL INFORMATION?

Neometro may collect Non-personal Information on the Websites including but not limited to, which sections of the Websites are most frequently visited, how often the Websites sections are visited, and for how long the Websites is used. This data is always used as aggregated, Non-personal Information and may be shared with Neometro agents and employees to provide them with information relating to how our visitors access and use the Websites. This is done for the purpose of providing you with the best and most efficient services.

10. HOW CAN YOU UPDATE THE PERSONAL INFORMATION?

We take reasonable steps in the circumstances to ensure that the Personal Information that we collect, use and disclose is accurate, up to date and complete. Where an individual request to have Personal Information corrected, we will take reasonable steps to correct the Information as quickly as is reasonably possible, having regard to the purpose(s) for which it is held.

To request your personal information to be updated, please contact us.

11. SENSITIVE INFORMATION

The Privacy Act protects your sensitive information, such as information about your religion, ethnicity, health or biometrics (for example, your fingerprints). If we need this type of information, we will ask for your permission, except where otherwise allowed by law.

12. MINORS

Neometro is for use by persons over the age of 18. We do not solicit or knowingly collect Personal Information from Minors. If we discover that we have received Personal Information from an individual who indicates he or she is, or that we otherwise have reason to believe is, a Minor, we will promptly delete such information from our systems. A Minor's parent or legal guardian may request that the Minor's Personal Information be corrected or promptly deleted from our files by contacting us.

13. COOKIES

We may use 'cookies' or other similar tracking technologies on our Websites that help us track your usage of our services and remember your preferences. Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different Websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser, but our Websites may not work as intended for you if you do so.

We may also use cookies to enable us to collect data that may include Personal Information. For example, where a cookie is linked to your account, it will be considered Personal Information under the Privacy Act. We will handle any Personal Information collected by cookies in the same way that we handle all other Personal Information as described in this Privacy Policy.

You may delete or decline cookies by changing your browser settings. If you do so, some of the features and services of our Websites may not function properly.

14. HOW CAN YOU COMPLAIN ABOUT PRIVACY AND THE WEBSITES?

If you have any complaints about our dealings with your Personal Information, including any breaches by us of any Australian Privacy Principles, or any questions regarding this Privacy Policy, you are able to submit such complaints or queries by contacting us using the contact details below:

- (a) email us at sales@neometro.com.au
- (b) call us on 03 9534 7774
- (c) contact us via 11 Smith Street, Fitzroy VIC 3065

Any complaints received by us will be referred for prompt investigation by our team and a written response will be provided to you as soon as possible.

If you are not satisfied by our response, you may acquire further information regarding privacy from the **Office of the Australian Information Commissioner**.

15. TRANSFER TO OTHER COUNTRIES

For the purpose of this Clause 15, Personal Data means any information relating to an identified or identifiable natural person in accordance with Article 4(1) of the EU General Data Protection Regulation.

We may disclose Personal Data outside of Australia to third party suppliers, contractors or cloud providers located in various countries. This may include countries within and outside the European Economic Area and the United States of America.

We have hosting facilities in Australia and the US. Transfers to the US will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission, a copy of which can be obtained from <https://www.privacyshield.gov/>. This framework protects the fundamental rights of anyone in EU whose personal data is transferred to Australia for commercial purposes. This arrangement imposes strong data protection obligations on companies receiving personal data from the EU, safeguards on Aus government data, effective protection and redress for individuals, and is subject to annual joint review by EU and Aus.

When you provide your Personal Data to us, you consent to the disclosure of your information outside of Australia and acknowledge that we are not required to ensure that overseas recipients handle that Personal Data in compliance with Australian Privacy Law. We will, however, take reasonable steps to ensure that any overseas recipient will deal with such Personal Information in a way that is consistent with the Australian Privacy Principles.

Personal Data collected within the European Union may, for example, be transferred to and processed by third parties located in a country outside of the European Union. In such instances, Neometro shall ensure that the transfer of your Personal Data is carried out in accordance with applicable privacy laws and, in particular, that appropriate contractual, technical and organizational measures are in place such as the Standard Contractual Clauses approved by the EU Commission.

In accordance with the EU GDPR 2018, you have the following rights: -

- a. Right of Access – the right to access the personal information that we hold or process about you;
- b. Right to Rectification – the right to update, correct or amend the personal information that we hold or process about you;
- c. Right to Erasure – the right to request remove personal information that we hold about you
- d. Right to Restrict – the stop processing all or some of your personal data;
- e. Right to Object – the right to object to your personal information being used for direct marketing purposes;
- f. Right to Data Portability – the right to request a copy of your personal data in electronic format;
- g. Right not to be subject to Automated Decision making – the right to not be subject to a decision based solely on automated decision making, including profiling, where the decision would have a legal effect on you or produce a similarly significant effect.

Should you wish to:

- a. receive the Personal Data collected within the European Union;
- b. have your Personal Data erased from the database of transferrable data to the European Union; or
- c. object to your Personal Data being transferred to the European Union,

please contact Neometro at sales@neometro.com.au

16. 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.

17. LINKS

Our Websites 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.

18. WHAT HAPPENS IF THERE ARE PRIVACY AND WEBSITES CHANGES?

We may revise this Privacy Policy from time to time by updating this page. The revised Privacy Policy will take effect when it is posted on the Websites.

19. CHANGE IN CONTROL

If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our user databases, together with any Personal Information and Non-Personal Information contained in those databases. This information may be disclosed to a potential purchaser under an agreement to maintain confidentiality. We would seek to only disclose information in good faith and where required by any of the above circumstances.

20. CONTACT US

If you have any feedback or questions about this Privacy Policy, the practices of this Websites, or your dealings with Neometro, you can contact us using the following details:

- (d) email us at sales@neometro.com.au
- (a) call us on 03 9534 7774
- (b) contact us via 11 Smith Street, Fitzroy VIC 3065