

# FREEWHEELER PRIVACY POLICY

## Introduction

This policy outlines in general terms how Freewheeler Pty Ltd ACN 601 523 022 (“us”, “we” or “our”) collects, stores, uses and discloses your personal information. By using our app and / or website you accept this policy as amended from time to time.

We may amend this policy as our business requires or the law changes. Any changes to this policy will be included in this policy as accessible via the app.

## 1. Personal Information We Collect

1.1. The types of personal information that we collect about you will depend on our relationship with you, the circumstances of collection and the type of services you request from us. The personal information may include:

- (a) your name, gender, date of birth, height, weight, home address, work address;
- (b) your location and travel history;
- (c) your activities;
- (d) your purchases;
- (e) your calorie consumption and carbon emissions;
- (f) your contact details including, but not limited to, your email address, postal / delivery address and telephone / mobile number;
- (g) your financial details including, but not limited to, your tax file number (TFN), bank account details and superannuation details;
- (h) payment details (such as credit / debit card number and expiry date) provided in connection with the provision of services; and
- (i) information relating to your use of our app and website.

1.2. Where we collect information from you about another individual, such as an employee, customer or supplier, you must advise them of the disclosure of the information to us and their privacy rights.

## 2. How We Collect Personal Information

2.1. We may collect personal information about you when you give it to us directly, use our app, use our website (including our online portal), utilise our services, register to receive our newsletters or other communications, enter into one of our competitions or otherwise interact with us.

2.2. We also use a range of social media channels such as Facebook and Twitter (“**Social Media**”) to distribute news, announcements, promotions and to address community enquiries. If you submit or post comments, images, tweets, recordings or other personal content for public display on Social Media, that information may be available for anyone in the world to read, view or comment on. We encourage you to read the separate Social Media privacy policies which relate to their use. We are not responsible to you for the information handling practices of Social Media.

## 3. How We Use Your Personal Information

3.1. We may use your personal information for the following purposes:

- (a) to provide, and administer our provision of, services, including verifying your identity; contacting you about your requests, processing payments; testing our systems; and managing your interaction with our suppliers;

- (b) to track your travel events and activities;
- (c) to track your purchases;
- (d) to identify goods and services that may interest you;
- (e) to compile reports and analytics for commercial use for example by transport agencies, government departments, ticketing agencies, insurance companies, sponsors and participating reward businesses;
- (f) to provide and operate our competitions, promotions and events;
- (g) to distribute our newsletters and other communications either ourselves or with the assistance of third party service providers;
- (h) to conduct marketing activities for our services, or goods and services of third parties, and to conduct market and other research;
- (i) to maintain records and comply with our legal obligations; and
- (j) for any other use that you authorise in writing.

3.2. The provision of personal information is optional. However, if you do not provide us with certain types of personal information, you may be unable to enjoy the full functionality of our app and website or obtain services from us.

#### **4. Disclosure of Personal Information**

4.1. We may disclose your personal information to suppliers and third parties that perform services for us in connection with our app and in connection with the provision of our services, including third parties who:

- (a) assist us in providing services to you;
- (b) provide information technology services such as data storage, website hosting, software and system development, maintenance and support, information processing, analysis and reporting;
- (c) assist us in processing credit / debit card payments;
- (d) provide marketing services; and
- (e) provide services in the course of investigating a complaint or a security incident.

4.2. We may also disclose your personal information:

- (a) to comply with our legal obligations;
- (b) to comply with judicial proceedings or a court order;
- (c) to assist in locating a missing person;
- (d) to establish, exercise or defend a legal or equitable claim; or
- (e) for the purposes of a confidential alternative dispute resolution.

#### **5. How We Use Cookies**

5.1. Cookies are small pieces of data stored on the web browser on your computer. Our website may store cookies on your web browser.

5.2. The main reasons we store cookies are to:

- (a) improve your website browsing experience;
- (b) gather statistics on website usage; and
- (c) enable us to present customised and appropriate messages to you.

5.3. You can set up most web browsers so you are notified when a cookie is received, so you can then either accept or reject it. You can also check the cookies stored by your web browser and remove any that you do not want.

5.4. If you disable the use of cookies on your web browser or remove or reject specific cookies from our website or linked sites, then you may not be able to gain access to all the content and facilities of our website or linked sites.

## **6. How We Hold And Keep Your Personal Information Secure**

6.1. We hold your personal information in a combination of hard copy and electronic files. We also use third party information system providers who may store or have access to your personal information.

6.2. We may combine personal information we receive about you with other information we hold about you. This includes information received from third parties.

6.3. We take reasonable administrative, technical, and physical safeguards to protect your personal information from misuse, loss, unauthorised access, alteration or disclosure.

6.4. Secure methods are used to destroy or de-identify any personal information, provided the information is no longer needed for any purpose and it is permissible by the law to do so.

## **7. Disclosure of Personal Information Overseas**

In the course of providing our services, we may disclose your personal information to third parties located overseas who assist us in providing the services. In particular, we may disclose your personal information to cloud service providers, data processors and providers of other information technology services.

## **8. Access to and Correction of Personal Information About You**

8.1. If you would like to request access to, or correction of, the personal information we hold about you, please contact us by emailing us at [support@freewheeler.com](mailto:support@freewheeler.com).

8.2. We will provide you with access to the information we hold about you, including for the purpose of correcting or updating that information, unless there is an exception which applies under the Australian Privacy Principles. Your request to provide access to this information will be dealt with within a reasonable time.

8.3. If we refuse to provide you with access to, or correct, the information, we will, to the extent required by law, notify you of our reasons for the refusal and how you may complain about the refusal.

## **9. Opting Out of Promotion and Marketing**

If you do not want to receive communications about our latest services, you can opt out by emailing us at [support@freewheeler.com](mailto:support@freewheeler.com).

## **10. Privacy Complaints and Further Information**

If you have a concern about your privacy or you have any query on how your personal information is collected or used please contact us by emailing us at [support@freewheeler.com](mailto:support@freewheeler.com).