

Privacy Policy

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1 INTRODUCTION

1. This Privacy Policy

(a) This Privacy Policy (**Policy**) forms Yomojo's Standard Form of Agreement (**Agreement**) between Yomojo Pty Ltd (ACN 609 279 245) (**Yomojo, us, we**) and you (**you, your**). This document sets out our Privacy Policy and explains:

- how we collect information about our customers;
- the information that we collect;
- what your personal information may be used for; and
- how you can access and update your information.

(b) Yomojo is committed to protecting your privacy. This Policy explains how we collect, use and share personal information about you and your nominated end-users (**End-Users**) through use of our website (**Site**), our mobile applications (each, an **App**), and our products and services (collectively, the **Services**). End-users are you, and other users of Services on your account such as your children, partner/spouse, family, guests on your network or your staff. End-users who are identified as under 13 years old (individually, a **Child**, and collectively, **Children**) may be referred to separately in this Policy so that you may limit the collection, use and sharing of your Child's personal information.

(c) By using our Sites or Apps, or by providing any personal information to us, you consent to the collection, use and disclosure of your personal information as set out in this Policy.

2. Principles

Yomojo complies with Australian government laws and obligations towards your privacy under the *Telecommunications Act 1997* (Cth), *Telecommunications (Interception and Access) Amendment (Data Retention) Act 2015*, the *Do Not Call Register Act 2006* (Cth), the *Spam Act 2010* (Cth) and *Privacy Act 1988* (Cth), and is bound by the Australian Privacy Principles (**APPs**) set out in the *Privacy Act 1988* (Cth). Further information about this can be found at the website of the Office of the Australian Information Commissioner; www.privacy.gov.au and Attorney-General's Department at cac@ag.gov.au.

Yomojo will take reasonable steps to ensure you are aware we are collecting your personal information, who is collecting it (which area of Yomojo), which laws authorise or require us to, the purpose of the collection, how it may be disclosed and to who, and whether the information will be transferred outside of Australia. We'll also tell you how to access our Privacy and Complaint handling policies and procedures.

3. Our obligation

It is our obligation to fulfil what is required by the law; this includes assisting with legal proceedings, crimes, fraud, protection, detection and prosecution.

4. Notification

- (a) In most cases, you will be notified before we collect any personal information, you will have access to any personal information we own and must let Yomojo know if any changes need to be made to our records. In some situations, we may be unable to advise you of any collected information. However, we promise to let you know as soon as possible after the collection.
- (b) Generally, we don't need any sensitive information from you such as details about your race, ethnicity, political views, religious or philosophical beliefs, sexual preferences, health, genetics or criminal records as it has no bearing on the Services we provide.
- (c) Sensitive information will not be used for marketing purposes. This information will only be used in circumstances which may be a threat to someone's safety and if we are required to do so by a relevant authority.

2 COLLECTING INFORMATION

1. How we collect information

- (a) We will collect personal information in many different ways as outlined below. Most information is collected through you, when you register with Yomojo and use our Services.
- (b) In general, we do not collect personal information from Children. We do not solicit your Child to contact us or provide us with personal information. If in the event that your Child does contact us, we will only collect the data included in that communication.
- (c) Some specific circumstances where we may collect information are:
 - when you register as a Yomojo customer;
 - when you use any of our Services;
 - when you contact us with queries or comments;
 - when you enter in any competitions or promotions;
 - when you take part in market research;
 - when you pay your bill;
 - if you cancel your Service; and
 - through business directories and other public sources.

2. The sort of information we collect
 - (a) For telecommunications products and services, we are required by law (such as, but not limited to, the *Telecommunications Act 1997* (Cth)) to collect specific information. Additionally, we collect other information that is used for the purpose of providing you with your Service.
 - (b) *Account Information*: in order to provide you with the Services, we require information to create an account with us, including name, contact number, email address, a password and date of birth.
 - (c) *Address Information*: to provide you with a telecommunications service, we are legally obliged to collect your primary home address. We also require your address, which may be different to your home address, for delivery of any physical products.
 - (d) *Identification Information*: to provide you with a telecommunications service, in some circumstances we are legally obliged to collect specific identification documents, including government-issued documents such as a driver's licence. This information may be required at the point of purchase or activation of a telecommunications service or, more generally, where account-level transactions, particularly regarding telecommunications services ownership, have been requested by you.
 - (e) *Telecommunications Information*: in circumstances where you nominate to bring your existing mobile number from another mobile service provider to us through Mobile Number Portability, we require specific information, being the mobile number, your existing service provider and other account-identifying information in order to port your number to us.
 - (f) *Information You Provide to Us for Support*: when you use our support channels you may share with us information in emails, over the telephone, or in online chat services. We will capture this information as a record of what we've been asked to and have done for you. We do this for quality and service assurance purposes.
 - (g) *Payment Information*: to facilitate payment for the Services we provide to you, we require you to provide us with payment method details. We do not store this information directly but provide it to Payment Card Industry compliant payment gateways to store and process.
 - (h) *End-User Information*: while you may be the account holder, our Services can and are intended to be used by your nominated End-Users. When registering an End-User, we may ask you for their name, date of birth and PIN or password. This information may be required to provide you with the Services. Some of our products allow you to optionally save a photo or avatar of your End-User.
 - (i) *Requests for Information*: we may ask for and collect information in surveys and forms as well as posting forums such as Facebook and in blog comments. Where this is undertaken using third-party services, we are not responsible for the third-party use of information submitted by you to these forums.
 - (j) *System Operational Information*: our Products and Services log system-level activities. This information is captured for quality assurance purposes only.

- (k) *Web and Internet Information:* We use automatic data collection technology (such as Google Analytics) when you visit our Sites. We may collect information such as your IP address, internet service provider, browser type, operating system and language, referring and exit pages and URLs, date and time, amount of time spent on particular pages, what sections of the website you visit, number of links you click while on the website, search terms, and other data. This information is collected automatically and anonymised.

We also collect information using "cookies". Cookies are small data files stored on your computer's hard drive by a website. Among other things, cookies help us improve our Services and your experience with our Products. We use cookies to store session data, remember your account settings and preferences and determine if your computer system is compatible with certain technologies, such as Flash and JavaScript.

- (l) *End-User Cyber Safety Data:* our cyber safety products enable you to monitor and control your End Users' use of the internet and of their devices. By necessity, our Products record device usage and information (*Cyber Safety Data*) so we can provide controls and insights to you. Depending on the features enabled for this product, the Cyber Safety Data we may collect covers:

- Internet usage: use of the internet including online search terms, sites visited, and sites blocked and related meta-data such as device, protocol, website, location, time and date.
- Mobile apps: use of apps on mobile devices, including what apps are used, are blocked or permitted to be used, and related information such as device details, time and date.
- Device location: Geo-location information provided by GPS Location services available on smart devices, additionally related time and date information.
- Behaviour: our Products monitor for actions (or patterns of actions) which suggest our Service has been interfered with or compromised. For example, if an End User deletes the FamilyEye App without approval.
- Transactional: Our Products log transactions for the purpose of notifying and reporting system events. For example, where a device connects to a network that blocks or interferes with our Service.

- (m) *Third-party Authentication Information:* for convenience, we may offer you the ability to sign-in to our Sites and Apps using third-party authentication services (such as Facebook and Google). Where you choose to use such services, we will exchange authentication information with them such as your email address. You will be required to accept their terms of use and policies with respect to the exchange of information. We are not responsible for the third-party use of information submitted by you under these mechanisms.

- (n) We will treat all personal information with respect, and we will carry out all legal obligations in this area. All information will be stored safely and accessed directly

only by Yomojo staff or our nominated agents solely for the purpose of providing you with the Services.

3 USE AND SHARING OF DATA

1. Examples of what your information may be used for

Having your information means we are able to provide you with relevant and timely information regarding your account and your Service. The main reason we collect this information is to provide you with your Services, examples of this are:

- billing you for your Services;
- administering and managing your Services;
- providing you with or notifying you of Service-related information;
- letting you know about our Services and how we can help you with your phone usage;
- providing you with the chance to share your opinions;
- where required by industry code or standard or by law enforcement agencies;
- where legally required as a supplier of telecommunications services;
- business planning and development;
- providing you with promotional messages/offers (of which you may opt out);
- receiving advice (legal or financial); and
- assisting fraud prevention agencies.

2. How do we use the information?

We specifically use your information to:

- provide you with access to different parts of our website;
- reduce the risk of crime and fraud;
- investigate complaints made by customers;
- analyse the market and produce reports;
- market our services to you;
- carry out debt tracing, debt recovery, credit management and crime, fraud and money detection and prevention; and
- to provide information via direct marketing of offers, promotions or commercial communications (unless you opt-out of this).

3. Third parties

- (a) We will not give your information to a third party unless you agree for us to do so. However, there may be certain Services which you will not receive if you do not to provide all of the information that we ask of you.
- (b) We may disclose your information to third parties who work with us in carrying out our business and providing, promoting or improving our Products and Services. This includes related bodies corporate, suppliers and business partners, agents, consultants and advisers.

For example, this may include:

- regulatory or legal bodies overseeing a complaint or concerns of yours (such as the Telecommunications Industry Ombudsman);
- technicians we engage to ensure your Service is working;
- suppliers we use to supply you the Service;
- debt collectors or other such companies that assist in debt recovery;
- credit reporting bodies or credit providers if there are failed payments;
- fraud-checking and authorised security agencies to carry out checks;
- other telecommunications and information service providers when, for example, you are moving services between one or another;
- our professional advisors or contractors, for example our auditors, accountants or lawyers;
- market research and customer review organisation who can assist us in developing the quality of our Services and Products;
- digital advertising platforms we use to advise you of our Products and Services; and
- any authorised government or regulatory authority or enforcement agency where we are required or specifically permitted under law to.

4 RETENTION OF INFORMATION

At Yomojo, we have a series of security measures in place to protect your personal information. We keep customer information in controlled systems that are protected with authorised access only and prevent copying of your personal information. We use secure server and closed network environments and encrypt data in transit. We manage and access privileges to ensure your personal information is limited to only those who require it. We also provide continuing training to our staff and regular security reviews and we have dedicated teams who monitor and maintain this. Most importantly, we remain attentive to protecting your personal information.

The controls are the same and just as strict, irrespective of where our staff member is located. Yomojo protects your personal information by:

- completing ID checks to verify your identity and to check the details we hold about you are correct and up-to-date;
- regularly monitoring, training and quality assessing our staff in matters of privacy;
- storing all data in secure centres in Australia only;
- providing system access only via controlled logins and different security and authorisation levels that ensure access to information for all staff is related only to the job role they perform and have been trained for;
- ensuring functional restrictions apply including remote access being applied to limited people specifically to perform their mandated job role;
- securing our property and operational systems with authorised security access only;
- ensuring system access and modification to customer records is logged under the specific staff member and conducting occasional audits to monitor this activity;
- applying security restrictions to copying, printing and recording information and limiting access to such operations to authorised personnel only; and
- implementing strict security protocols on the transfer of data within Yomojo.

5 ACCESSING YOUR INFORMATION

1. Registered Customers

- (a) If you are a customer with Yomojo, you will have access to some of your information through your account when you log in to your homepage. Yomojo will try to keep all personal information it collects uses and retains about you accurate and up-to-date.
- (b) If there are any errors with your information, for example, a change of address, please let us know so that we can keep all information on our records up-to-date.

6 SECURITY AND PROTECTION

1. Communication

You should be aware that communications over the internet are not always secure unless they are encrypted. Yomojo cannot take responsibility for any unauthorised access or missing information.

2. Customers or End Users Under the age of 16 years

A parent/guardian must give a child under the age of 16 permission to provide any personal information to Yomojo. No personal information should be disclosed without such consent. Yomojo accepts no responsibility for how parental/guardian consent is obtained.

3. Children

Our Sites, Apps and Services are intended for use by general audiences. If your End-User is a Child, your child WILL NOT be blocked from using our Services which will result in information being collected as per this Policy.

7 CHANGES TO THIS PRIVACY POLICY

This Policy is kept under constant review and changes may occur at any time. We would advise that you please keep an eye out for any adjustments.

8 COMPLAINTS

If you have a credit reporting issue, you can contact us using the contact details in the 'Contacting Us' section below.

We will acknowledge your complaint in writing as soon as possible, and always within 7 days. We will aim to investigate and resolve your complaint within 30 days of receiving it. If we need more time, we will let you know, and we will give you the reasons for the delay along with a new estimated timeframe. We may need to consult with a credit reporting body or another credit provider to investigate your complaint.

While we hope to be able to resolve any complaints you have, you can also lodge a complaint with the Telecommunications Industry Ombudsman (www.tio.com.au).

If your complaint cannot be resolved, you can also contact the Office of the Australian Information Commissioner (www.oaic.gov.au).

9 CONTACTING US

The following are our contact details:

Yomojo Pty Ltd ACN 609 279 245

Phone: 1300 YOMOJO (1300 96 66 56)

International: +61 2 8089 1602

Email: support@yomojo.com.au

Website: www.yomojo.com.au

Facebook: www.facebook.com/Yomojo