

Privacy Policy

Pongolabs Pty Ltd ABN 55 163 894 246 is committed to protecting the privacy of your Personal Information. We will only collect and deal with your information in accordance with the *Privacy Act 1988 (Cth)* (**Privacy Act**) in particular the National Privacy Principles. Words capitalised in this policy have the meaning given in the Privacy Act.

Collection

We not collect Personal Information unless the information is necessary for one or more of our functions or activities and only by lawful and fair means and not in an unreasonably intrusive way. We will collect Personal Information necessary to market and deliver our products to you including:

- your name, contact details and any username or passwords allocated by us or used by you to access our products;
- if you are customer that is responsible for payments to us regarding our products, payment related information (including direct debit or credit card details where applicable);
- information that you enter and submit to us during your use of our products; and
- information about which of our products you use, how you use them and your preferences.

Generally we will collect this information directly from you but in some cases it will be collected by our service providers or from third parties (either with your consent or to the extent permitted by law). If you provide information about other individuals, we rely on you informing those individuals that you are providing their information to us and of this policy. You are also responsible for obtaining any consents from those individuals as contemplated under this policy.

If you choose not to provide certain Personal Information, we may not be able to provide you with some services.

Use and disclosure

We will use your Personal Information for the purposes described above and some secondary purposes including:

- managing and providing our products and services to you;
- monitor, develop and improve our products and services.

You also consent to us using your Personal Information to be collected and used for the purpose of us marketing our products to you (including by electronic communications). If you do not wish to receive marketing communications from us, please let us know by contacting [insert].

We may disclose Personal Information to 3rd party suppliers that we use in the course of providing our products and services, our related bodies corporate and our advisors. We may also disclose Personal Information to government and regulatory authorities and other organisations, as required or authorised by law. We will take reasonable steps to ensure that any third party that we disclose Personal Information to are bound by confidentiality and privacy obligations in relation to the protection of your Personal Information. Please note that 3rd parties may also collect personal information directly from you.

Please note that our products are hosted by Amazon. You should refer to their privacy policy at <http://aws.amazon.com/privacy/>.

Data quality

We will take reasonable steps to ensure any Personal Information we collect, use or disclose is accurate, complete and up-to-date. You should inform us promptly if there are any changes to any of your Personal Information.

Data security

We will take reasonable steps to:

- protect the Personal Information we hold from misuse and loss and from unauthorised access, modification or disclosure; and
- destroy or permanently de-identify Personal Information if it is no longer needed for any purpose for which the information may be used or disclosed under this policy (unless we are required by law to keep it).

Openness

We will make the document available to anyone who asks for it and, to the extent this policy does not do so, we will take reasonable steps to let any person who asks know, generally, what sort of Personal Information we hold, for what purposes, and how we collect, hold, use and disclose that information.

Access and correction

You have a right to access your Personal Information (subject to some exceptions allowed by law) and request correction of your information. Unless it is not permitted by law, we reserve the right to charge a fee for identifying, copying, collating and providing access to your information.

Identifiers

We do not collect or use government Identifiers.

Anonymity

Where it is practical and legal to do so, we will generally provide you with the ability to interact with us anonymously.

Transborder data flows

If we transfer your Personal Information outside Australia, we will comply with the requirements of the Privacy Act that relate to transborder data flows. Some third party suppliers supporting our systems (or the systems of our suppliers) may access those systems remotely from overseas.

Sensitive information

Generally we do not collect any Sensitive Information about you. However, some of our products may be used by you (or other users) to collect Sensitive Information. Were you submit that information about yourself, you consent to us collecting and dealing with that information in accordance with this policy. Where you submit that information to us in respect of another person, you must ensure that you have obtained their consent in accordance with this policy.

Contacting us, complaints and further information

If you have any questions or complaints you may contact our Privacy Officer (info@pongolabs.com). General information about privacy is also available at www.privacy.gov.au.

Changes to this policy

We may change this policy and you should check the current version on our website www.pongolabs.com regularly. It is current as at June 2012.