

PRIVACY POLICY

This policy outlines the way we at Positive Dog Business (ABN 54673381990) collect, hold, use and disclose personal information.

WHAT PERSONAL INFORMATION WE COLLECT & HOW AND WHY WE COLLECT IT?

What personal information do we collect?

The personal information we collect is generally limited to:

- credit card or direct debit details,
- name and contact details,
- opinions, and
- any communications we have.

However, we may also collect information about how you use our website, via third parties.

How do we collect your personal information?

The main way we collect information is when you give it to us, for example, via our website sign-up, intake or other forms, via phone, email, when you submit comments or feedback or via social media. We also use cookies on our website which may identify you and track your actions and the pages you visit. This helps make our website work more securely and efficiently, such as enhancing security on our contact form, and storing your information, so you don't have to put it afresh when you visit us again.

At times personal information may also be gathered from third parties, such as Google Analytics or Facebook Pixel. These third parties may use cookies, web beacons and similar technology to collect or receive information about you from our website and elsewhere on the internet.

Why do we collect your personal information?

We need your personal information to:

- communicate with you in relation to your enquiry;
- send you news if you have signed up (you can unsubscribe at any time);
- conduct our business, and enable your use of our website, products and services; and
- in some cases, to comply with our legal obligations, such as record keeping.

We also collect personal information to analyse and enhance our business operations and improve your experience with our business. This is used as statistical information to analyse the traffic to our website, and to customise the content and advertising we provide.

You can opt-out of the collection and use of this information by changing your privacy settings or opting out. To opt-out you can go here: <https://tools.google.com/dlpage/gaoptout>

To change your LinkedIn ad preferences, you can go here: <https://www.linkedin.com/mypreferences/d/categories/ads>

To change your Facebook ad preferences, you can XXX.

WHEN DO WE DISCLOSE PERSONAL INFORMATION & HOW YOU CAN ACCESS IT?

When do we disclose your personal information?

We will take reasonable precautions to protect your personal information, including against loss, unauthorised access, disclosure, misuse or modification. It is kept securely and accessible only to authorised personnel. Information is kept in accordance with our legal record keeping obligations and then destroyed appropriately. If it is unsolicited, it is also destroyed. We generally will not disclose your personal information unless:

- you consent;
- it is required or authorised by law*; or
- it is reasonably necessary for one of the purposes for which we collect it.

* This can include where we are of the reasonable belief that there is a serious risk to life, health or safety of you or another person. For example, if there is evidence of clear danger of harm to self-and/or others, we may be legally required to report this information to the authorities responsible for ensuring safety. This includes if there is a strong suspicion of physical or sexual abuse or emotional, or neglect or exposure to family violence of any person under 18 years of age. A court order could also require us to release information contained in records.

However, we do disclose your personal information where it is necessary to obtain third party services, such as analytics, data storage, payment service providers or marketing and advertising services. To protect your personal information, we endeavour to ensure that our third-party service providers also comply with the Australian Privacy Principles, but some third parties we use may collect, hold and process personal information overseas. **You can opt-out of the collection and use of this information by changing your privacy settings or opting out.**

How can you access or delete your information?

If you want access to your information to correct or have it deleted, please email us at shona@positivedogbusiness.com.au. Except where we are permitted or required by law to withhold it, we will help you. If you consider that we have breached any privacy laws, please also email us at shona@positivedogbusiness.com.au. You can make a complaint with the Office of the Australian Information Commissioner by phone at 1300 363 992, online at <http://www.oaic.gov.au/privacy/making-a-privacy-complaint> or post to: Office of the Australian Information Commissioner, GPO Box 5218, Sydney, NSW 2001.

ADDITIONAL PROVISIONS FOR EUROPEAN CITIZENS

If you are a resident of the European Economic Area ("EEA") or the UK you have certain rights and protections under the General Data Protection Regulations ("GDPR") or its UK equivalent, *The Data Protection Act 2018* regarding the processing of your personal information. We are a controller under the GDPR as we collect, use, and store your personal information to enable us to provide you with our website services and information about them.

We rely on the following lawful means of processing your personal information:

- where you have given us valid express consent to use your personal information we will rely on that consent, and only use the personal or sensitive information for the specific purpose for which you have given consent; and
- where we need comply with the law or act in an emergency, we will rely on that lawful means of processing your personal information.

Your Rights

If you are an EEA or UK resident, you have various rights including the right to be informed; right of access; right to rectification; right to object; right to restriction of processing; right to erasure or to be forgotten; right to data portability; and right not to be subject to automated processing. If you want to access personal information we hold about you, or ask if that the information be corrected, please contact us at shona@positivedogbusiness.com.au. In some circumstances, you also have a right to object to or ask that we restrict certain processing activities or delete your personal information. If you would like to limit or request deletion of your personal information or exercise any other rights, you can do so by contacting us. You can withdraw your consent to our collection or processing of your personal information. You can do so by contacting us at shona@positivedogbusiness.com.au or by opting out of email newsletter communications by following the instructions in those emails or by clicking unsubscribe. If you withdraw your consent to the use of your personal information, you may not have access to our services, and we might not be able to provide you with our services. In some circumstances where we have a legal basis to do so we may continue to process your information after you have withdrawn consent, for example if it is necessary to comply with an independent legal

obligation or if it is necessary to do so to protect our legitimate interest in keeping our services secure.

Security

All personal information stored on our website platform is treated as confidential. It is stored securely and is accessed by authorized personnel only. Our collection is limited in relation to what is necessary, for the purpose for which the personal information is processed and kept only for so long as is necessary for the purpose for which the personal information was collected. We implement and maintain appropriate technical, security and organisational measures to protect personal information against unauthorized or unlawful processing and use, and against accidental loss, destruction, damage, theft, or disclosure. We ensure the encryption and pseudonymisation of personal information and we have adequate cyber security measures in place. By providing us with your personal information you consent to us disclosing it to third parties who reside outside the EEA countries or the UK. We will ensure that those third parties are GDPR compliant.