

Privacy Policy

My Marketing Coach provides marketing coaching, advice and expertise to small and medium business customers. My Marketing Coach is committed to protecting the privacy and personal information of its customers. This Privacy Policy describes the practices and processes My Marketing Coach has in place to properly manage and safeguard that information.

Privacy laws that apply to My Marketing Coach

My Marketing Coach is required to comply with the Privacy Act 1988 (Cth) and is bound by the Australian Privacy Principles ('APPs') set out in that Act. The APPs establish minimum standards for the collection, use, disclosure and handling of personal information. They apply to personal information in any form, including electronic and digital form. The APPs can be accessed at the website of the office of the Australian Information Commissioner: www.privacy.gov.au.

My Marketing Coach is also subject to other laws relating to the protection of personal information. My Marketing Coach's direct marketing activities must also comply with the Do Not Call Register Act 2006 (Cth) and the Spam Act 2010 (Cth).

In this Privacy Policy, unless the context otherwise requires:

- **'Privacy Law'** refers to any legislative or other legal requirement that applies to Commander's collection, use, disclosure or handling of personal information.
- **'Personal information'** means information or an opinion about an identified individual or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information or opinion is recorded in material form or not. Personal information includes sensitive information.
- **'Sensitive information'** means personal information about an individual's racial or ethnic origin, political opinions or memberships, religious beliefs or affiliations, philosophical beliefs, professional or trade association/union memberships, sexual preferences and practices or criminal record.

Why does My Marketing Coach collect personal information?

My Marketing Coach collects personal information in order to:

- provide and manage the services we provide, including for billing and credit control purposes;
- inform customers about changes and improvements to our products and services;
- market My Marketing Coach products and services to current and prospective customers; and

- comply with our legal obligations.

My Marketing Coach needs to be able to collect personal information for most of its business activities, although the information we require depends on the particular circumstances. If we are unable to collect the personal information we need, we may be unable to meet the expectations of our customers or provide the products and services they wish to receive.

Whose personal information does My Marketing Coach collect?

My Marketing Coach collects or holds personal information about individuals who are:

- **Prospective customers.** This includes people we think may be interested in our products and services as well as people who have expressed interest in obtaining or learning more about those products and services.
- **Current customers.** This includes people who purchase My Marketing Coach products or services or who hold an account with My Marketing Coach.
- **Past customers.** These are people who have purchased My Marketing Coach products or services but are not active accounts.

My Marketing Coach may treat current and past customers as prospective customers for other My Marketing Coach products and services.

My Marketing Coach may in rare circumstances collect personal information from people who are under the age of 18. If My Marketing Coach does this, My Marketing Coach may also collect personal information about the parent or guardian of that person.

My Marketing Coach also collects personal information about all the individuals who are involved in providing My Marketing Coach products and services. This includes:

- staff of My Marketing Coach entities; and
- service providers and suppliers, agents and affiliates, and their staff.

Can you deal with My Marketing Coach without identifying yourself?

No, identification is required to provide correct information to our clients.

What personal information does My Marketing Coach usually collect?

My Marketing Coach collects a wide range of personal information about its customers, but the type and amount of information collected depends on the

particular business context. However, My Marketing Coach seeks at all times to ensure that it only collects the personal information that is necessary for the purposes of its business activities.

My Marketing Coach needs to collect basic identifying and contact information for all customers, including prospective customers. This will usually include name, date of birth, email address, telephone number(s) and residential address. For corporate and business customers, My Marketing Coach collects information about nominated contacts, including name and title or position, date of birth, telephone number(s) and email and business addresses.

My Marketing Coach also collects information about purchasing patterns, consumer preferences and attitudes from prospective and current customers for marketing purposes, including to analyse markets, develop marketing strategies and to identify and develop products and services that may be of interest to its customers.

When you become, or apply to become, a My Marketing Coach customer, My Marketing Coach collects a range of other information that that it needs to assess your application and manage your account(s). This includes:

- **Financial and credit information**, including credit history, employment history, remuneration details, bank account and credit card information, information about assets and income and details of relevant court judgments and bankruptcies. We need this information to assess creditworthiness and financial suitability of current and prospective customers.
- **Employment information**, including information about employment history including current and past employers. We may need this information to assess the financial position of a person who applies to become a My Marketing Coach customer.

We also collect information about the way our customers use My Marketing Coach products and services. This includes information about:

- responses to offers made and/or promotions run by My Marketing Coach or its affiliates;
- payment patterns and history; and
- enquiries and complaints.

We collect information about our employees and prospective employees for the purpose of making employment decisions and managing our staff. We also collect information about suppliers, freelance partners, service providers, agents and affiliates, and their staff, for the purposes of conducting our day-to-day business activities.

How does My Marketing Coach collect personal information?

We collect personal information by various means and via various media, depending on the particular business context.

We collect information about prospective customers both directly and via suite of freelancers and affiliates. We may collect this information:

- through My Marketing Coach outbound and inbound sales activities;
- through My Marketing Coach websites, or websites operated by My Marketing Coach affiliates;
- through social media platforms such as Linked In and Facebook; and
- through the purchase of marketing lists, databases and data aggregation services.

When you become or apply to become a My Marketing Coach customer, in addition to collecting personal information directly from you, we may also collect information about you from our agents and affiliates, credit reporting agencies, your past and present employers, current service providers, family members or associates and other third parties.

When you apply to become a My Marketing Coach customer, we will ask you to consent to us collecting information from particular third parties. We will only collect personal information from those parties if you consent. If you do not consent, we may not be able to provide the service or product you require. We are authorised to collect some personal information from third parties under Privacy Law.

My Marketing Coach receives unsolicited personal information from time to time. In accordance with its obligations under Privacy Law, Commander will decide whether it would have been permitted to solicit and collect that information and if it would not have been, will destroy or de-identify the information (provided it is lawful to do so).

What information will My Marketing Coach give you when it collects personal information?

My Marketing Coach is required by Privacy Law to take reasonable steps to ensure that you are made aware of certain information when it collects personal information about you. For example, we are required to:

- make sure you are aware that we have collected the information (if we collect it from a third party without your knowledge);
- identify any law that authorises or requires collection of the information;
- let you know the purposes for which we collect the information, the entities that the information is likely to be disclosed to and whether the information will be transferred outside Australia; and
- tell you how to access our Privacy Policy and complaint handling procedures.

This Privacy Policy sets out this information in general terms. However, where we collect personal information in relation to a particular product or service, and the

information we are required to provide is not likely to be obvious from the circumstances, we usually provide the required information in a 'collection statement'. The way we do this will depend on how you are dealing with us. For example:

- When personal information is collected via the My Marketing Coach website or any affiliate website that My Marketing Coach may advertise on, a statement is displayed or a link provided to a statement that sets out the information we are required to provide.
- A statement containing the required information is printed on the sign-up page of most of the standard forms we use to collect personal information.

If we collect personal information about you from a third party, we take reasonable steps to ensure you receive the information we are required to provide. However, we may do this by requiring the third party to provide the information, rather than us providing the information to you directly.

We may also include information about our collection of personal information in welcome packs, customer account statements, update bulletins, notices and other documents we give to our customers.

My Marketing Coach's use and disclosure of personal information

Where My Marketing Coach collects personal information for a particular purpose, it may use and disclose the information for that purpose or another purpose that is related to that purpose (or that is directly related to that purpose in the case of sensitive information). For example:

- Personal information collected from you for the purpose of establishing or managing an account may be used and disclosed for related purposes such as identity verification, credit checking, assessing entitlement to concessions, supplying and servicing a product, connecting and administering a service, billing and collection in relation to the service and investigating and rectifying complaints or faults.
- Personal information collected for the purpose of establishing or managing an account may also be used for the purpose marketing of other My Marketing Coach products and services. My Marketing Coach may contact prospective, current or past customers about products and services (including products not related to a product or service previously supplied). For example if we currently provide you with a telephone service, we may contact you with offers relating to electricity or gas services.

My Marketing Coach may use personal information about prospective, current and past customers for the purpose of direct marketing of My Marketing Coach products and services or those of other organisations. Direct marketing communications may be sent via post, email, telephone, door to door canvassing, social media sites or other means. However:

- My Marketing Coach will not use sensitive information for direct marketing purposes without your consent.
- Whenever we communicate with you for direct marketing purposes, we will give you the opportunity to opt out of receiving further direct marketing communications from My Marketing Coach.
- You may opt out of receiving direct marketing communications from My Marketing Coach at any time by contacting us at theteam@mymarketing.com.au or calling 0423 843 393.
- If we use your personal information to facilitate direct marketing by other organisations on behalf of other organisations, you can ask us to provide the source of the information by contacting us at theteam@mymarketing.com.au or calling 0423 843 393.

Personal information about My Marketing Coach staff, agents, affiliates and service providers is used and may be disclosed for the purpose of managing the relationship with the staff member or other entity.

My Marketing Coach may also disclose personal information for credit checking, collection or credit reporting purposes to a credit reporting agency or credit collection agency, in accordance with the requirements of the Privacy Act 1988.

Personal information may also be disclosed to third party agents and service providers who My Marketing Coach engages to assist in the provision of products and services. These include:

- sales agents and representatives;
- organisations that process banking transactions;
- organisations that process debt collection;
- printers, mail distributors, couriers and dispatch centres;
- legal, accounting, insurance and business advisory consultants services

How does My Marketing Coach protect your personal information?

My Marketing Coach recognises the importance of protecting your personal information and of ensuring that it is complete, accurate, up-to-date and relevant.

While some of the personal information we collect is held in hardcopy form, most personal information is stored in electronic databases.

We have extensive processes in place to ensure that our information systems and files are kept secure from unauthorised access and interference. These include:

- Logins and different security levels control system access. Access to customer information for all staff is centrally controlled. Access requests must be supported by a request from senior management.
- Our employees undergo privacy and information security training on induction and are required to sign acknowledgements of their obligations in relation information security and appropriate use of our IT systems.
- We have contractual arrangements in place with our agents, service providers, freelance contractors and affiliates that require them to comply with applicable privacy laws and My Marketing Coach privacy policies. Our

contractual arrangements with third parties who are outside Australia are designed to ensure that personal information transferred to those parties is afforded the same level of protection as would apply to the information in Australia.

Can you access or correct personal information My Marketing Coach holds about you?

You have a right to access personal information we hold about you. If your request is particularly complex or requires detailed searching of our records, there may be a cost to you in order for us to provide you with this information.

If you believe there are errors in the information we hold about you, you have a right to ask us to correct the information.

However, we are not required to provide access where we believe doing so would:

- prejudice law enforcement or crime prevention activities;
- pose a serious threat to health or safety;
- have an unreasonable impact on the privacy of other individuals;
- prejudice My Marketing Coach in legal proceedings or negotiations with you;
- reveal information connected with a commercially sensitive decision making process; or
- be contrary to law.

If you wish to have access to information My Marketing Coach holds about you, you should contact My Marketing Coach Customer Service.

Dealing with My Marketing Coach online

This Privacy Policy also applies to personal information that you email to us, provide by using our website or provide via social media sites. We store the Internet Protocol (IP) address of your computer when you visit our site. This information is used only to create broad demographic summaries of where our users come from. Our use of these IP addresses, however, does not go so far as to identify the actual users of the site.

We collect personal information about the other websites that are visited by computers that are used to visit our site. This information may be aggregated to provide us with information about the types of webpages and websites, or particular webpages and websites, visited by computers that use our site.

Our website may use cookies and web-beacons. While cookies and web beacons can be used to statistically monitor and analyse the use of our site and to identify information about the computer used to visit our site, we do not use them for that purpose and will not attempt to use them to identify or target individual visitors to

our website.

Note that this privacy policy does not apply to, and My Marketing Coach is not responsible for, the use of, or the protection of information provided to, other websites linked to this website.

Complaints and further information

If you believe your privacy has been interfered with and wish to make a complaint, please contact our Privacy Officer. The Privacy Officer will investigate your complaint and notify you of the outcome.

If it appears from your complaint that there has been an interference with privacy by a person other than My Marketing Coach the Privacy Officer may discuss the complaint with that person in an attempt to resolve it.

If you are dissatisfied with the outcome of your complaint, or you do not receive a response to your complaint within 30 days, you may make a complaint to the Office of the Australian Information Commissioner (OAIC). Complaints to the OAIC must be made in writing. Where possible, complaints to the OAIC should be made through the online Privacy Complaint form, available at www.oaic.gov.au/privacy/making-a-privacy-complaint.

If you would like further information on this Privacy Policy or if you have any concerns over the protection of your personal information, please contact:

The Director
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