

Aston Club Privacy Policy

1. Commitment to open and transparent management of your personal information

- 1.1 To offer the services we provide, we will need to collect personal information in our business of:
 - 1.1.1 providing a mobile phone point of sale payment system
 - 1.1.2 customising promotional or advertising material made available via an App using our mobile phone point of sale payment system;
 - 1.1.3 contacting you regarding the mobile phone point of sale payment system;
 - 1.1.4 monitoring your use of the mobile phone point of sale payment system; and
 - 1.1.5 informing you about goods and services that might interest you, (collectively '**Primary Business**').
- 1.2 We are committed to open and transparent management of your personal information in line with our obligations under the privacy laws.
- 1.3 This policy sets out how we collect and use personal information including:
 - 1.3.1 how we collect and protect your information;
 - 1.3.2 how we use your information;
 - 1.3.3 disclosure of information;
 - 1.3.4 our compliance with direct marketing and spam laws;
 - 1.3.5 information of offshore disclosure; and
 - 1.3.6 how you can correct information or complain about our use of your personal information.
- 1.4 We will only collect information in accordance with the law, the Australian Privacy Principles and through fair means.
- 1.5 The 13 Australian Privacy Principles can be found here:
<http://www.oaic.gov.au/privacy/privacy-resources/privacy-fact-sheets/other/privacy-fact-sheet-17-australian-privacy-principles>

2. Collecting and looking after your information

- 2.1 We collect personal information (information that can identify you in some way) from the following sources:

- 2.1.1 information that you give us by signing up to the mobile phone point of sale payment system;
 - 2.1.2 information that you give us using the mobile phone point of sale payment system;
 - 2.1.3 information obtained by our related third parties or authorised third party contractors; or
 - 2.1.4 via social media networking mediums such as Facebook.
- 2.2 By agreeing to our terms and conditions [found here **TBA**] you have consented to the collection of your information in these ways.
- 2.3 Collection will be made either through our phone point of sale payment system or the social networking medium that you use on each occasion that you use phone point of sale payment system or the elected social networking medium.
- 2.4 The information collected is only that which is necessary for the purpose of carrying on our Primary Business.
- 2.5 We will collect from you, at each use, either through our mobile phone point of sale payment system or social networking mediums:
- 2.5.1 your name;
 - 2.5.2 mobile number;
 - 2.5.3 email contact;
 - 2.5.4 date of birth;
 - 2.5.5 your image;
 - 2.5.6 gender;
 - 2.5.7 your payment method details;
 - 2.5.8 specific information about your transactions through phone point of sale payment system including details of what is purchased and, when and where purchases occur; and
 - 2.5.9 other general data related to our Primary Business or the information collected in 2.4 and 2.5 of this Policy.
- 2.6 When you use our phone point of sale payment system we may collect information about:
- 2.6.1 your device's operating system;
 - 2.6.2 your device's type and capability;
 - 2.6.3 your device's Internet Protocol (IP) Address and geolocation;
 - 2.6.4 the local time on your device.

- 2.7 We will not identify Users or their browsing activities except where we are compelled to by law or in accordance with our Terms and Conditions found here <http://astonclub.com.au/userterms> ('**Terms**').
- 2.8 We store this information on secure servers in our computer system. All reasonable steps are taken to protect this information and to protect it from loss, misuse or unauthorised access, disclosure or modification.
- 2.9 Reasonable steps may include physical, electronic and procedural protection which we assess based on the following criteria:
 - 2.9.1 the nature of our business and the reason for collecting your personal information;
 - 2.9.2 the nature and quantity of personal information held;
 - 2.9.3 the risk to individuals concerned if the personal information is not secured;
 - 2.9.4 our current data handling practices; and
 - 2.9.5 the ease with which security measures can be implemented.

3. **Use of your personal information**

- 3.1 We use your personal information for the purpose of carrying on our Primary Business including any other related activities and information that you may expect to be provided by us.
- 3.2 We also use that information, for any related secondary purpose where you would reasonably expect us to use the information or where permitted by law.
- 3.3 We use the sort of information collected from your computer or phone (mentioned in 2.6) for the purposes of managing our phone point of sale payment system, improving our business and ultimately delivering better results for our customers.
- 3.4 You have consented, pursuant to our terms and conditions which can be [found here **TBA**] to us using information we have received from a related third party or authorised third party contractor as if we had collected it from you in the first instance.
- 3.5 Use of your information will only be made in accordance with Australian Privacy Principle 6.

4. **Disclosure of your personal Information**

- 4.1 If we do disclose your personal information it will only be for the purpose of carrying on our Primary Business or for a related secondary purpose where you would reasonably expect us to disclose the information.
- 4.2 We may disclose your personal information in any other way that is required or authorised by you or the law.
- 4.3 By agreeing to our terms and conditions you have consented to us disclosing your personal information for the purpose of carrying on our Primary Business and any other related activities that you may expect from us.

- 4.4 Entities that we are likely to disclose your personal information to include:
- 4.4.1 our related bodies corporate;
 - 4.4.2 third parties or individuals who assist us in carrying on our Primary Business; or
 - 4.4.3 anyone else who you authorise us to make a disclosure to.
- 4.5 Typical situations where your consent will be implied include, but are not limited to disclosure to third parties that provide services such as our payment gateway, marketing, logistic and technology support which are required to settle or make a transaction or make our mobile phone point of sale payment system functional.
- 4.6 In addition, disclosure of your information will only be made in accordance with Australian Privacy Principle 6.

5. **Direct Marketing and Spam**

- 5.1 We will only use your information for direct marketing (advertising, special offers, updates etc) if you have given express or implied consent to receive it.
- 5.2 By agreeing to our Terms you have given express consent to receive these communications. As part of our rewards systems we will contact you with special offers that you are eligible to take up either by email.
- 5.3 We will only send you direct marketing communications that are consistent with our obligations under Australian Privacy Principle 7 and the *Spam Act 2003 (Cth)*.
- 5.4 We will always make it clear and simple to opt out of these communications and will respond to an opt out request within a reasonable period.
- 5.5 There are links that will allow you to opt-out of direct marketing communications on the communications themselves but if they aren't showing up, for whatever reason, please email support@astonclub.com.au to request an opt-out.

6. **Offshore disclosure**

- 6.1 As part of our business, disclosure of your personal information may be made. It is unlikely that disclosure will need to be made to offshore entities.
- 6.2 If we do decide to disclose your information to a foreign entity it is our responsibility to ensure your personal information is protected. We ensure, amongst other things, that:
- 6.2.1 the current privacy policy of the foreign entity complies with Australian requirements and is in line with Aston Club's privacy obligations;
 - 6.2.2 if necessary, we will seek further agreements or consents from the foreign entity; and
 - 6.2.3 we will mitigate any risk of a breach of this privacy policy even when the disclosure is to a foreign entity.
- 6.3 The countries where these entities reside could vary due to the nature of wireless networks and cloud computing.

- 6.4 It is not always practical for us to notify you of which country your personal information may be disclosed into but if we know which countries we can expect to make disclosure to we will update this policy accordingly and seek your consent on the subsequent disclosure.
- 6.5 Where an offshore disclosure is made it is always in accordance with the Australian Privacy Principle, particularly Australian Privacy Principle 1 and 8.

7. Your rights to correct or complain

- 7.1 We are only allowed to keep your personal information if it is up-to-date and correct. Any information that is out-of-date or no longer required will be de-identified or destroyed.
- 7.2 At any time you can contact us and seek access to or correction of the personal information we hold about you.
- 7.3 Contact us by email at support@astonclub.com.au or write to us at:

Aston Club Pty Ltd
8 Gough Street 3121 Cremorne
Victoria, Australia

- 7.4 If you wish to complain about a breach of your rights under the *Privacy Act 1988* (Cth) please contact us on the email and postal addresses above providing details of your complaint in writing.
- 7.5 We will respond to any complaint within 30 days. If you are not happy with our response you can complain directly to the Office of the Australian Information Commissioner by following this link:

<http://www.oaic.gov.au/privacy/making-a-privacy-complaint>

If you have any questions about privacy, your personal information, direct marketing, spam or our obligations or this policy please contact us at support@astonclub.com.au.