

# Modelve Privacy Policy

## 1 Purpose and nature

Modelve Pty Ltd (ACN 674 783 049) (**Modelve, we or us**) recognises the importance of your privacy. This Privacy Policy explains how Modelve intends to collect, store, use, disclose, protect and otherwise handle your personal information having regard to the Australian Privacy Principles (**APPs**) contained in the *Privacy Act 1988* (Cth) (**Privacy Act**).

This Privacy Policy does not constitute a contractual representation, promise, guarantee or warranty by Modelve to you as to the manner in which Modelve will or may collect, store, use, disclose, protect or otherwise handle your personal information.

This Privacy Policy applies to Modelve and its related entities, such as its subsidiaries, and their employees. These related entities comply with the same obligations that Modelve has to protect your personal information under this Privacy Policy.

## 2 What is personal information?

Personal information is information or an opinion about you, whether true or not and whether recorded in a material form or not, from which you can be reasonably identified.

## 3 Why does Modelve collect personal information?

Modelve collects personal information to provide, administer, improve, personalise and market our products and services to you. We also collect personal information to support our business functions.

If we do not collect your personal information, we may not be able to provide you with our products and services.

## 4 What personal information does Modelve collect?

The types of personal information collected by Modelve include:

- (a) names;
- (b) contact details (including address, email address, telephone number(s) and other contact details);
- (c) usernames and passwords; and
- (d) other information you provide to us.

## 5 How does Modelve collect your personal information?

Modelve will collect personal information only by lawful and fair means and not in an unreasonably intrusive manner. When you provide us with personal information you consent to the use, disclosure and handling of your personal information in accordance with this Privacy Policy and any subsequent amendments (see clause 14).

### 5.1 Collecting information from you

If it is reasonable and practical to do so, Modelve will collect personal information directly from you.

Depending on how you choose to interact with Modelve, Modelve may collect your personal information when you contact, or are contacted by, Modelve or one of our service providers. We will collect your personal information when you apply for products or services we offer, subscribe to our newsletter, complete forms, including order forms, social media platforms or have telephone conversations with us or otherwise transact with us.

### 5.2 Collecting information from third parties

Modelve may also collect information about you from other people (e.g. a third party administrator) or independent sources. However, we will only do so where it is not

reasonable and practicable to collect the information from you directly. Where we have collected your information from a third party, such personal information will be held, used and disclosed by us in accordance with this Privacy Policy.

### 5.3 Collecting information from visits to our website

Modelve may collect information about how you use and visit our website and our software. For example, we record your server address, the date and time of your visit, the pages you visited, any documents you downloaded, and the type of device, browser and operating system you used.

We use and disclose this information in anonymous, aggregated form only for purposes including statistical analysis and to assist us to improve the functionality and usability of our website. You are not individually identified, however we reserve the right to use or disclose this information to try to locate an individual where we reasonably believe that the individual may have engaged in any unlawful or inappropriate activity in connection with our website, or where we are otherwise required or authorised by law to do so.

### 5.4 Cookies, web beacons and other similar technologies

We may also collect information based on how you use our website, including through 'cookies', web beacons and other similar technologies.

Cookies are small text files that are transferred to your computer's hard drive through your web browser to enable Modelve's systems to recognise your browser and record non-personal information such as the date, time or duration of your visit and the pages accessed, for website administration, statistical and maintenance purposes (**Cookie Information**).

We use cookies to provide you with a more consistent experience across our services. No attempt is made by Modelve to use Cookie Information to personally identify you. However, if Cookie Information is linked with personal information as set out above, this Cookie Information becomes personal information and will be treated in the same manner as the personal information to which it has been linked.

You can remove or reject cookies by adjusting the settings on your web browser. Please note that some parts of our website may not function fully for users that disable cookies.

### 5.5 Unsolicited information

If Modelve receives personal information that it has not requested and determines that the personal information received is not reasonably necessary to provide our services, we will take all lawful and reasonable steps (if any) to de-identify or destroy that personal information.

## 6 **Anonymity/pseudonymity**

Where practicable, you may be able to interact with Modelve anonymously or by using a pseudonym. Circumstances where it is not practicable, however, include where personal information is required to complete a payment transaction, contact you about our products and services or otherwise provide any services to you.

## 7 **How does Modelve hold your personal information?**

The security of your personal information is important to Modelve. Accordingly, Modelve takes reasonable steps to protect your personal information from misuse, loss and unauthorised access, modification or disclosure.

These steps include the implementation of the following safeguards:

- (a) password protected databases;
- (b) encryption of data in transit;
- (c) system firewalls; and
- (d) internal information security policies.

Modelve will take reasonable steps to permanently de-identify or responsibly destroy personal information if it is no longer needed for the purpose for which the information was used or disclosed.

#### 7.1 Security breach procedures

Modelve's data security practices have been adopted with a view to protecting the data held by Modelve. Notwithstanding this, individuals should be aware that there are inherent risks associated with the transmission of data over the internet and other mediums. Accordingly, Modelve cannot guarantee any transmission will be completely secure.

## 8 **How does Modelve use your personal information?**

Modelve may hold, use or disclose your personal information so that it can provide any products and services that you request.

Modelve may also hold, use or disclose your personal information to:

- (a) consider any concern or complaint that you raise against Modelve or to manage any legal action between you and Modelve;
- (b) prevent or investigate any actual or suspected fraud, unlawful activity or misconduct; or
- (c) comply with any relevant laws, regulations, codes of practice and court orders.

#### 8.1 Direct Marketing

Modelve may also use your personal information to identify and promote products or services that may be of interest to you.

At any time you may opt out of receiving direct marketing communications from Modelve. You may do, by clicking on the opt out link within an email, or by contacting the person in clause 12.

## 9 **How is personal information disclosed to others?**

Modelve does not sell, rent or trade personal information to, or with third parties.

Modelve may however, in order to provide our products and services to you, disclose your personal information to third parties in limited circumstances, including to:

- (a) external providers that perform services on behalf of Modelve;
- (b) financial institutions for payment processing;
- (c) data storage and archive service providers; and/or
- (d) business advisers (such as accountants, auditors and lawyers) if necessary.

Modelve does not disclose personal information to third parties outside Australia, unless required or permitted by law. However, we may engage cloud storage suppliers to store your personal information such as AWS who are based overseas.

To the extent we can, we will ensure that if we disclose your personal information overseas, your information will be collected, stored, used and disclosed in accordance with this Privacy Policy and the APPs.

#### 9.2 Third Party Links

Modelve's website may contain certain links to other websites. Modelve does not share your personal information with those websites and it is not responsible for the privacy practices applying in respect of those websites.

## 10 Change of control

If Modelve sells, assigns or otherwise transfers part or the whole of its business, your personal information, which was collected by Modelve through your use of its services, may be among the items transferred or sold to the extent that it is relevant to the Modelve business.

## 11 How you may access or correct your personal information

You may contact Modelve to request access to the personal information it holds about you at any time. You may also ask Modelve to correct information about you that you may believe is inaccurate, incomplete or out of date.

Please contact Modelve using the contact details set out in clause 13. Modelve will need to verify your identity before giving you access to, or correcting, your personal information. Modelve will respond to the request within a reasonable period after the request is made. There is no charge to make a request, however Modelve may charge a reasonable fee to cover the administrative costs of retrieving your personal information.

In certain circumstances, Modelve may refuse, or be unable, to correct or provide you with access to your personal information. In these circumstances, Modelve will write to you to explain the reasons why this is the case.

## 12 How you may complain if you have concerns about how Modelve has managed your personal information

If you have a complaint related to how Modelve has managed your personal information, please contact Modelve using the contact details set out in clause 13. Modelve may ask you to place your concerns in writing so that our compliance staff can fully understand and investigate your complaint.

Modelve will provide you with an estimated response timeframe in relation to your complaint. In any event, Modelve will endeavour to respond to your complaint within 30 days.

If a complaint remains unresolved, you may contact the Office of the Australian Information Commissioner (**OAIC**) at [www.oaic.gov.au](http://www.oaic.gov.au) to have the complaint heard and determined.

## 13 How to contact us

If you have any questions about this Privacy Policy or Modelve's management of your personal information, please contact Modelve on:

Attention: Privacy Officer  
Email: [privacy@modelve.com](mailto:privacy@modelve.com)  
Mail: Modelve Pty Ltd  
3 Albert Coates Lane  
Melbourne VIC 3000  
Australia

## 14 Changes to Modelve's privacy policy and information handling practices

This Privacy Policy is subject to change at any time so we encourage you to review this Privacy Policy at regular intervals. If Modelve changes this Privacy Policy an updated version will be posted on Modelve's website to notify you of this change. By continuing to use our services after that time you will be deemed to have accepted any changes to our Privacy Policy.