



Privacy Statement

IVE Group is committed to ensuring that your privacy is protected as required by the Australian Privacy Principles contained in the Privacy Act 1988. This Privacy Statement includes information on how IVE Group collects, uses, discloses and keeps secure, individuals' Personal Information. It also covers how IVE Group makes the Personal Information it holds available for access and correction by the individual as a result of your use of our Website.

This Privacy Statement sets out the approach which IVE Group and its businesses (formerly 'IVEO' and also 'Blue Star') will take in relation to the treatment of Personal Information. It includes information on how IVE Group collects, uses, discloses and keeps secure, individuals' Personal Information. It also covers how IVE Group makes the Personal Information it holds available for access to and correction by the individual.

This statement has been drafted having regard to IVE's obligations under the Privacy Act 1988 (including the new National Privacy Principles) (the Privacy Act).

This Statement is a public document and has been prepared in light of National Privacy Principle 5, Openness.

1. COLLECTION

1.1 IVE Group will only collect Personal Information where the information is necessary for IVE Group to perform one or more of its functions or activities. In this context, "collect" means gather, acquire or obtain by any means, information in circumstances where the individual is identifiable or identified.

1.2 IVE Group collects Personal Information primarily to supply our customers and their individual users of our systems with the products and services ordered from it and its related companies. IVE Group also collects and uses Personal Information for secondary purposes including:

- billing and account management,
- reporting individual user usage of our systems to the relevant IVE Group customer,
- business planning and product development,
- to provide individuals with information about promotions, as
- well as the products and services of IVE Group affiliated companies and other organisations to enhance the online shopping experience by displaying products and/or services that

match the personal preferences of individuals based on their previous website browsing history or buying activity.

1.3 IVE Group will not collect Sensitive Information from individuals except with consent and only where it is necessary for IVE Group to collect such information for an activity or function.

1.4 IVE Group will not collect Personal Information secretly or in an underhanded way.

2. USE

2.1 IVE Group will obtain an individual's consent for Use of non-sensitive Personal Information for Secondary Purposes at the time of collection, unless the Use is a related Secondary Purpose which would be within the relevant individual's Reasonable Expectations

2.2 IVE Group uses Personal Information primarily for the purposes listed in 1.2 above.

2.3 IVE Group will not use Sensitive Information for Direct Marketing.

2.4 IVE Group may use Personal Information to avoid an imminent threat to a person's life or to public safety. It may also use Personal Information for reasons related to law enforcement or internal investigations into unlawful activities

2.5 IVE Group will not use Personal Information without taking reasonable steps to ensure that the information is accurate, complete and up to date.

3. DISCLOSURE

3.1 IVE Group may Disclose Personal Information to related or unrelated third parties if consent has been obtained from the individual. This will include obtaining the individual's consent for Disclosures made under the credit reporting requirements of the Privacy Act.

3.2 IVE Group may Disclose Personal Information between Related Bodies Corporate. Where information is Disclosed to such a Related Body Corporate, that Related Body Corporate is bound by the original Primary Purpose for which the information was collected.

3.3 IVE Group may Disclose Personal Information of individual users of IVE Group's customers to the relevant customer for the purposes of activity monitoring, reporting and management (such as product usage, order history, order profiling and other administrative functions), where that is Disclosure or Use for a related Secondary Purpose and has been notified to individuals or where such Disclosure is within the individual's Reasonable Expectations.

3.4 IVE Group will take reasonable steps to ensure that its contracts with third parties include requirements for third parties to comply with the Use and Disclosure requirements of the Privacy Act.

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of the Privacy Act.

3.6 IVE Group may Disclose Personal Information to law enforcement agencies, government agencies, courts or external advisers where permitted or required by law.

3.7 IVE Group may Disclose Personal Information to avoid an imminent threat to a person's life or to public safety.

3.8 If a Disclosure is not for a Primary Purpose; is not for a related Secondary Purpose; or upfront consent has not been obtained, IVE Group will not Disclose Personal Information otherwise than in accordance with the exceptions set out at 3.1 to 3.6 above.

3.9 IVE Group does not generally sell or share its customer lists on a commercial basis with third parties but if it did, it would only do so if we had the appropriate consent of the individual involved. If the consent provided is conditional, IVE Group will take steps to ensure (by contract) that the use of its customer list by third parties does not exceed the scope of the consent.

4. INFORMATION QUALITY

4.1 IVE Group will review, on a regular and ongoing basis, its collection and storage practices to ascertain how improvements to accuracy can be achieved.

4.2 IVE Group will take steps to destroy or de-identify Personal Information after as short a time as possible and after a maximum of seven years from the date of the last customer interaction, unless the law requires otherwise.

5. INFORMATION SECURITY

5.1 IVE Group requires employees and contractors to perform their duties in a manner that is consistent with IVE Group's legal responsibilities in relation to privacy.

5.2 IVE Group will take all reasonable steps to ensure that paper and electronic records containing Personal Information are stored in facilities that are only accessible by people within IVE Group staff who have a genuine "need to know" as well as "right to know".

5.3 IVE Group will review, on a regular and ongoing basis, its information security practices to ascertain how ongoing responsibilities can be achieved and maintained.

6. ACCESS AND CORRECTION

6.1 IVE Group will allow its records containing Personal Information to be accessed by the individual concerned in accordance with the Privacy Act.

6.2 IVE Group will correct its records containing Personal Information as soon as practically possible, at the request of the individual concerned in accordance with the Privacy Act.

6.3 Individuals wishing to lodge a request to access and/or correct their Personal Information should do so by contacting IVE Group Privacy Officer, as per the details on this web page.

6.4 IVE Group can charge a fee for processing an access request but will generally not do so unless the request is complex or is resource intensive.

7. OPENNESS

7.1 The IVE Group Privacy Officer will be the first point of contact for inquiries about privacy issues. Individuals wishing to make an inquiry or complaint regarding privacy, should do so by contacting IVE Group Privacy Officer.

7.2 IVE Group websites will either provide a prominently displayed privacy statement or an easily accessible link to our Privacy Statement. These will include a copy of the IVE Group Privacy Statement.

8. ANONYMOUS TRANSACTIONS

8.1 IVE Group will not make it mandatory for visitors to its web sites to provide Personal Information unless such Personal Information is required to answer an inquiry or provide a service. IVE Group may however request visitors to provide Personal Information voluntarily to IVE Group (for example, as part of a competition or questionnaire).

9. TRANSFERRING PERSONAL INFORMATION OVERSEAS

9.1 IVE Group will take reasonable steps to limit the amount of Personal Information it sends to unrelated organisations overseas.

9.2 If Personal Information must be sent by IVE Group overseas for sound business reasons, IVE Group will require the overseas organisation receiving the information to provide a binding undertaking that it will handle that information in accordance with the National Privacy Principles, preferably as part of the services contract.

10. GLOSSARY

Collection Information means the information outlined in 1.3 notified to individuals prior to, or as soon as practical after, the collection of their Personal Information.

Direct Marketing means the marketing of goods or services through means of communication including written, verbal or electronic means. The goods or services which are marketed may be those of IVE Group or a Related Body Corporate or those of an independent third party organisation.

Disclosure generally means the release of information outside IVE Group, including under a contract to carry out an "outsourced function".

Opt Out means an individual's expressed request not to receive further Direct Marketing.

IVE Group means all companies in the IVE Group Australia Pty Ltd group of companies.

Personal Information means information or an opinion (including information or an opinion forming part of a database), whether true or not and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained

from the information or opinion.

Primary Purpose is the dominant or fundamental reason for information being collected in a particular transaction.

Reasonable Expectation means a reasonable individual's expectation that their personal information might be Used or Disclosed for the particular purpose.

Related Body Corporate means that where a body corporate is:

- a holding company of another body corporate, or
- a subsidiary of another body corporate, or
- a subsidiary of a holding company of another body corporate, or
- the first mentioned body corporate and the other body corporate, or
- are deemed to be related to each other.

Sensitive Information means information, or an opinion, about an individual's:

- racial or ethnic origin
- political opinions
- membership of a political association
- religious beliefs or affiliations
- philosophical beliefs
- membership of a professional or trade association
- membership of a trade union
- sexual preferences or practices
- criminal record, or
- that is also personal information or Health Information about an individual.

Use means the handling of Personal Information within IVE Group.

Contacting IVE Group

If you require further information regarding IVE Group's Privacy Policy, you can contact the IVE Group Privacy Officer by mail at:

Attention: The Privacy Officer
Locked Bag 555
SILVERWATER NSW 2128
AUSTRALIA

or by emailing privacy@ivegroup.com.au

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