

Privacy policy

General

Mutual Marketplace Pty Ltd (ABN 35 615 297 820) and its related bodies corporate (referred to in this document as **MM, we, us** or **our**) may collect, hold, use and disclose your personal information in accordance with this privacy policy and the *Privacy Act 1988* (Cth).

In this document, we use the term 'customers' to refer to individuals who work for entities to whom we provide goods and services, 'suppliers' to refer to individuals who provide us with goods and services or who work for entities who provide us with goods and services, and 'consumers' to refer to individuals who use our website or engage with us on social media platforms. In some circumstances, you may belong to more than one of these groups, and multiple sections of this document will then apply to you.

Privacy Collection Statement

Generally, we collect personal information directly from you via your interactions with us. There may be occasions where we need to collect additional personal information about you from third parties, such as where we engage with other individuals who work for the same entity as you.

If you are a customer for whom we act as a carriage service intermediary, we are required by law to collect certain information about you. The *Telecommunications (Interception and Access) Act 1979* (Cth) requires that we collect information about: the subscriber of, and accounts, services, telecommunications devices, and other relevant services relating to, the relevant service; the source of a communication; the destination of a communication; the date, time and duration of a communication, or of its connection to a relevant service; the type of a communication or of a relevant service used in connection with a communication; and the location of equipment, or a line, used in connection with a communication. We are required to retain this information for 2 years.

Under the Telecommunications (Service Provider -- Identity Checks for Prepaid Mobile Carriage Services) Determination 2017 (made under the Telecommunications Regulations 2021 made under the *Telecommunications Act 1997* (Cth)), if you purchase prepaid mobile services, we are required to collect your name and address and to verify your identity using your identification documents.

In most circumstances, the information we are required to collect under each of the telecommunications legislation above will not be personal information as it will relate to a company, however in some circumstances, the data may relate to an individual. Further, in most circumstances, as we are the intermediary service, the carriage provider will ordinarily collect and retain this information on our behalf, and it will not be disclosed to us unless required or authorised by law.

We collect, use, and disclose your personal information for the purposes of providing information, goods and services to you or someone else on your behalf, facilitating our internal business operations, and providing you with information about other goods and services that may be of interest to you.

If you choose not to provide the personal information requested, or it's incomplete or inaccurate, we may not be able to provide you with the information, goods and services you are seeking.

We disclose your personal information to our workers and consultants who assist us in operating our business, third parties to whom you have agreed we may disclose your information, or as otherwise required or authorised by law. We use third party service providers to operate our business and your personal information may be collected, held, used, and disclosed using those service providers. The third party service providers may have access to your personal information as a result of our use of their services. Some of those service providers are located overseas, such as SAP Ariba, Coupa, Microsoft, and

AdobeSign who are located in the United States, and Zoho who is located in India and the United States. We take reasonable steps to ensure these third parties have appropriate security for your personal information, and where possible, we require that personal information be held on servers located in Australia.

More detailed information is set out below about:

- the types of personal information we collect from you ('Types of information collected')
- the way we use and disclose your personal information ('Use and disclosure')
- how we secure your personal information ('Security')
- how you can access and correct that information ('Access and correction'); and
- how you can make a complaint about a breach of privacy ('Complaints and feedback').

If you would like to contact us about anything in this privacy collection statement, our contact details are set out below ('Complaints and feedback').

General

To the extent the *Privacy Act 1988* (Cth) (**Privacy Act**), and the Australian Privacy Principles (**APPs**) govern the way in which we must manage personal information, this policy sets out how we collect, use, disclose and otherwise manage personal information about customers, suppliers, and consumers.

Collection

Types of information collected

We may collect and hold personal information about you (that is, information that can identify you) that is relevant to our functions and activities. The kinds of information we collect from you depends on our relationship with you. For all individuals we deal with, we may collect your name, and other information relevant to providing you with the information, goods and services you are, or someone else on your behalf is, seeking.

If you are a *Customer*: we will also collect your employment address details, phone number, email address, position title, and employee ID. We will also track user activity when you access our systems.

If you are a *Customer* for whom we act as a carriage service intermediary: we will also collect information about: the subscriber of, and accounts, services, telecommunications devices, and other relevant services relating to, the relevant service; the source of a communication; the destination of a communication; the date, time and duration of a communication, or of its connection to a relevant service; the type of a communication or of a relevant service used in connection with a communication; and the location of equipment, or a line, used in connection with a communication. We are required to retain this information for 2 years.

If you are a *Customer* for whom we procure prepaid mobile services: we will also collect your identification documents in order to verify your identity.

If you are a *Supplier*: we will generally also collect your address details, phone number, and email address, ABN, as well as payment details to enable us to pay you (if applicable). We will also track user activity when you access our systems.

If you are a *Consumer*: we will generally also collect information such as your IP address, geographical location, browser type, user preferences, cookie information, data and time of visit (if using our website), and information available to us on your social media account (if interacting with us via social media).

We are not likely to collect any sensitive information about you unless you consent to the collection and it is reasonably necessary for the performance of our functions and activities, or otherwise required or authorised by law. Consent may be implied by the circumstances existing at the time of collection (such as if you voluntarily disclose sensitive information to us).

Method of collection

We will generally collect personal information directly from you through a variety of avenues, including via emails, phone, in person, our website and social media accounts, and via our surveys (where applicable). Where we act as a carriage service intermediary, data will ordinarily be collected by the carriage provider on our behalf.

If we receive unsolicited information about you that we did not request and which is not directly related to our functions or activities, we may be required to destroy or de-identify that information, providing it is lawful and reasonable to do so.

Purpose of collection

The personal information we collect and hold about you depends on your interaction with us. Generally, we collect, use, and hold your personal information if it is reasonably necessary for or directly related to the performance of our functions and activities and for the purposes of:

- (a) providing information, goods and services to you or someone else on your behalf;
- (b) facilitating our internal business operations, including:
 - (i) establishing our relationship with you;
 - (ii) maintaining and managing our relationship with you and communicating with you in the ordinary course of that relationship;
 - (iii) generating invoices and receipts, and engaging in debt recovery actions;
 - (iv) the fulfilment of any legal requirements;
 - (v) analysing our business operations, goods and services with a view to developing new or improved goods and services or business operations;
 - (vi) contacting you to provide a review or testimonial for us or to fill out a survey for us; and
 - (vii) providing you with information about other goods and services that we or our related entities and other affiliated organisations offer that may be of interest to you.

Internet users

Our website may contain links to other websites. We are not responsible for the privacy practices of linked websites and linked websites are not subject to our privacy policies and procedures.

Our website uses cookies. The main purpose of cookies is to identify users and to prepare customised web pages for them. Cookies do not identify you personally, but they may link back to a database record about you. We use cookies to monitor usage of our website and to create a personal record of when you visit our website and what pages you view so that we may serve you more effectively.

Use and disclosure

Generally, we only use or disclose personal information about you for the purposes for which it was collected (as set out above). We may disclose personal information about you to:

- (a) our employees, volunteers, contractors and consultants (**workers**), agents, and other parties who require the information to assist us with facilitating our internal business processes, providing you with information, goods and services, and with establishing, maintaining, managing, or ending our relationship with you;
- (b) third party service providers who assist us in operating our business and providing you with information, goods and services (including insurers, IT and technology service providers, telecommunications providers, debt recovery service providers, and professional advisers such as lawyers, accountants, and auditors) and these service providers may not be required to comply with our privacy policy;
- (c) government agencies, including the Australian Prudential Regulatory Authority;
- (d) third parties to whom you have agreed we may disclose your information or where the information was collected from you for the purposes of passing it on to the third party; and
- (e) any other entity as otherwise permitted or required by law.

We may expand or reduce our business and this may involve the sale and/or transfer of control of all or part of our business. Personal information, where it is relevant to any part of the business for sale and/or transfer, may be disclosed to a proposed new owner or newly controlling entity for their due diligence purposes, and upon completion of a sale or transfer, will be transferred to the new owner or newly controlling party to be used for the purposes for which it was provided.

Sensitive information is only used and disclosed for the purposes for which it was collected, unless your further consent is obtained or otherwise as permitted or required by law.

Direct marketing

We will never knowingly send you unsolicited commercial electronic messages. More information on the *Spam Act 2003* (Cth) is available from the regulator's website: www.acma.gov.au/spam.

If you subscribe to a mailing list offered by us, we may use or disclose your personal information (excluding sensitive information) for direct marketing purposes. We are not likely to use sensitive information for the purposes of direct marketing, but if we do, we will obtain your consent before doing so. We may include third party offers in marketing materials we send to you.

You will be able to opt-out of direct marketing at any time with no charge to you, or request us to provide you with our source of information, by email to legal@mmpl.com.au, or through the unsubscribe link found in all marketing emails we send. We will then ensure that your name is removed from our mailing list.

If you receive communications from us that you believe have been sent to you other than in accordance with this policy, or in breach of any law, please contact us using the details provided below.

Security

We store your personal information in different ways, including in paper and electronic form. The security of your personal information is important to us. We take all reasonable measures to ensure that your personal information is stored safely to protect it from interference, misuse, loss, unauthorised access, modification or disclosure, including electronic and physical security measures.

Personal information collected is hosted on third party data servers, and where possible, we require those servers to be located in Australia, although they may be located overseas. We take reasonable steps to ensure any third party data storage suppliers we partner with have appropriate cyber and physical security controls in place.

Where personal information held by us is no longer necessary for our operations, we take reasonable steps to delete it or permanently de-identified, subject to specific laws in respect of data retention.

Access and correction

You may access the personal information we hold about you by making a written request. We will respond to your request within a reasonable period. We may charge you a reasonable fee for processing your request (but not for making the request for access). For security reasons, you will be required to put your request in writing and provide proof of your identity.

It is essential that the information contained in our records is accurate, complete, and up to date. If, upon receiving access to your personal information or at any other time, you believe the personal information we hold about you is inaccurate, incomplete or out of date, please notify us immediately. We will take reasonable steps to correct the information so that it is accurate, complete and up to date.

If we refuse to correct your personal information, we will give you a written notice that sets out our reasons for our refusal (unless it would be unreasonable to provide those reasons), including details of the mechanisms available to you to make a complaint.

Complaints and feedback

If you have any queries or concerns about our privacy policy or the way we handle your personal information, or you wish to make a complaint about a breach of the Privacy Act, the APPs, or a privacy code that applies to us please contact us using the details below and we will take reasonable steps to investigate the complaint and respond to you.

Address: Suite 3C, Level 3, 127 Creek Street, Brisbane, QLD, 4000

Email address: legal@mmpl.com.au

Telephone: 1300 030 935

Website: www.mutualmarketplace.com.au

For more information about privacy in general, you can visit the Office of the Information Commissioner's website at www.oaic.gov.au.

If after this process you are not satisfied with our response, you can submit a complaint to the Office of the Information Commissioner, Australia. To lodge a complaint, visit the 'Complaints' section of the Information Commissioner's website, located at <http://www.oaic.gov.au/privacy/privacy-complaints>, to obtain the relevant complaint forms, or contact the Information Commissioner's office.

Changes and updates

We reserve the right to review, amend and/or update this policy from time to time. If further privacy legislation and/or self-regulatory codes are introduced or our privacy policy is updated, we will summarise any substantial modifications or enhancements in this section.