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Privacy Policy

1. Introduction

Welcome to Orderus, an interactive mobile and website platform that provide customers with a way to order food, beverage and merchandise products from restaurants and venues (“**Platform**”). By signing up for a customer or merchant account or by using any Orderus Services (as defined below), you are agreeing to be bound by the following terms and conditions (the “Terms of Service”).

The Platform is owned by ORDERUS TECHNOLOGIES PTY LTD (ACN 657 929 158) (together “we”, “us”, “our” and “Orderus” means the applicable Orderus Contracting Party) and these terms and conditions explain our obligations as a service provider and your obligations as a venue (“**you**”, “**your**”, “**Venue**”).

You accept that your use or access of our Platform and/or your submission of our Onboarding Form confirms your acceptance of these Terms of Service, Terms of Use and Privacy Policy.

Your privacy is important to us and we are committed to protecting your personal data and taking all reasonable steps to protect your information from misuse and to keep it secure in compliance with the Privacy Act 1988 (Cth) and the EU General Data Protection Regulation (EU) 2016/679 (together “**data protection law**”).

This policy applies to our website (www.orderus.com.au; www.orderus.au), our customer-ordering websites and our social media pages (collectively, our “**Sites**”) and the services you can access through them.

In our mission to make commerce better for everyone at Orderus, we collect and use information about you, our

- Merchants or Venue using Orderus to power your business
- Customers who shop at a Orderus-powered business
- Users of Orderus apps and services like Store or via Platform
- Visitors to Orderus’s websites, or anyone contacting Orderus support

This policy explains why and how we will use the personal information that we have obtained from you, with whom we will share it and the rights you have in connection with the information we use.

Please read this policy carefully.

Orderus Technologies Pty Ltd is the controller in relation to the processing activities described below. This means that we decide why and how your personal information is processed in connection with those activities listed. Please see the section at the end of this policy for our contact and legal information.

By accessing Orderus information and/or services using mobile digital routes such as (but not limited to) mobile, tablet or other devices/technology including mobile applications, then you should expect that Orderus's data collection and usage as set out in this privacy policy will apply in that context too. We may collect technical information from your mobile device or your use of our services through a mobile device, for example, location data and certain characteristics of, and performance data about your device, carrier/operating system including device and connection type, IP address, mobile payment methods, interaction with other retail technology such as use of NFC Tags, QR Codes or use of mobile vouchers. Unless you have elected to remain anonymous through your device and/or platform settings, this information may be collected and use by us automatically if you use the service through your mobile device(s) via any Orderus mobile application, through your mobile's browser or otherwise.

We also collect personal information through our related bodies corporate, our business partners, and third parties who supply services to us.

We will not collect sensitive information from you or any third party.

From time to time, you may provide us, and we may collect from you, personal information of a third party (for example, for delivery purposes). Where you provide the personal information of a third party, it is your responsibility to ensure that those persons are aware of this Privacy Policy, understand it and agree to accept it.

2. Our Values

Trust is the foundation of the Orderus platform and includes trusting us to do the right thing with your information. Three main values guide us as we develop our products and services. These values should help you better understand how we think about your information and privacy.

Your information belongs to you

We carefully analyze what types of information we need to provide our services, and we try to limit the information we collect to only what we really need. Where possible, we delete or anonymize this information when we no longer need it. When building and improving our products, our engineers

work closely with our privacy and security teams to build with privacy in mind. In all of this work our guiding principle is that your information belongs to you, and we aim to only use your information to your benefit.

We protect your information from others

If a third party requests your personal information, we will refuse to share it unless you give us permission or we are legally required. When we are legally required to share your personal information, we will tell you in advance, unless we are legally forbidden.

We help Venue, Merchants and partners meet their privacy obligations

Many of the Venue, Merchants and Partners using Orderus do not have the benefit of a dedicated privacy team, and it is important to us to help them meet their privacy obligations. To do this, we try to build our products and services so they can easily be used in a privacy-friendly way. We also provide detailed FAQs and documentation covering the most important privacy topics, and respond to privacy-related questions we receive.

Privacy for Orderus Visitors

What information we collect about you and why

We collect the following personal information about you when you visit one of our websites or contact Orderus support:

What we collect	How we use it
Information about you that you provide us about yourself, like your name, address, email address, and phone number.	To provide you use of, and to improve, the app or service you are trying to use (e.g., to confirm your identity, to contact you about issues with the platform, to invoice you)
	To verify that we are speaking with you
	To advertise and market products or features to you
	To comply with legal requirements
Information about how you access and use Orderus apps, websites, and other services, including information about the device and browser you use, your network connection, your IP address, and details about how you browse through our apps and sites, including search terms you may enter. We collect some of this information by using “cookies” or other	To provide you use of, and to improve, our websites and related services (e.g., identifying ways to make our platform easier to use or navigate)
	To personalize your experience using our websites (e.g., by changing the layout of our webpages)
	To advertise and market products or features to you

similar technologies directly from your device. For more information about how we use these technologies, see our Cookie Policy.	To provide app developers aggregated analytics relating to their app listing on Orderus’s App Store
Copies of your government-issued identification.	To verify that we are speaking with you if you contact us
	To comply with other legal requirements

[When and why we share your information with others](#)

We share your personal information with companies who help us provide you with our services. We also share your personal information with others:

- to prevent or investigate suspected fraud, threats to physical safety, illegal activity, or violations of a contract (like our Terms of Service) or our policies (like our Acceptable Use Policy)
- to help us conduct marketing and advertising
- to comply with legal requirements, or to respond to court orders or other similar government demands (for more information, please read our Government Access Policy)
- if we merge with or are acquired by another company

Privacy for Merchants or Venue

[What information we collect about you and why](#)

We collect personal information when you sign up for Orderus, when you use our platform, or when you otherwise provide us information. We may also use third party service providers to help us review accounts for fraud or other concerns. In general we need this information for you to be able to use our platform.

What we collect	How we use it
Information you provide us about you and your business, like your name, the name of your staff or other individuals associated with your business, company name, address, email address, and phone number.	To provide you with the use of our platform and other related services (e.g., to confirm your identity, to contact you about issues with the platform, to invoice you)
	To advertise and market products or features to you
	To comply with legal requirements
	To prevent fraudulent use of our services
Information about how you access Orderus websites, your account, and our platform, including information about the device and browser you use, your network connection, your IP address, and details about how you browse our websites and platform. We collect some of this information by using “cookies” or other similar technologies directly from your device. For more information about how we use these technologies, see our Cookie Policy.	To provide you use of, and to improve, our platform and other related services (e.g., identifying ways to make our platform easier to use or navigate)
	To personalize the platform for you (e.g., by showing you apps in our app store that we believe may be useful to you)
	To advertise and market products or features to you
	To prevent fraudulent use of our services
	To create and manage your Orderus Payments account

If you use Orderus Payments, we collect more specific information you provide us about your business, including your business address, business type, business ID number, bank account information, date of birth (if you are an individual business owner), and in some circumstances, government-issued identification (such as your Social Security Number, Driver License, Employer Identification Number, or Tax Identification Number).	To provide you with the Orderus Payments services
	To conduct fraud and risk monitoring
	To comply with legal requirements (such as “know your customer”, anti-money laundering, or anti-terrorism laws)
	To provide tax documentation
Copies of government-issued and/or a picture of yourself holding your identification that you provide us.	If we need to verify your identity (e.g., to protect you against identity theft or fraud)
	To verify that we are speaking with you if you contact us
	To help us determine or verify account ownership
	To comply with legal requirements
If your business is listed on Shop, you may voluntarily disclose personal data revealing the racial or ethnic origin or sexual orientation of the business owner.	To highlight collections of stores for the purpose of promoting diverse businesses

We also work with companies that provide us with information about merchants or prospective merchants (for example, to protect against fraud or if we’re sponsoring an event).

[When and why we share your information with others](#)

Running a business is hard, and we work with a variety of companies to help us provide you with a range of services to help you support your business. We sometimes share your personal information with these companies to help us provide you with Orderus services.

We also share your personal information with others:

- to prevent or investigate suspected fraud, threats to physical safety, illegal activity, or violations of a contract (like our Terms of Service)
- to help us conduct marketing and advertising
- to comply with legal requirements, or to respond to court orders, or other similar government demands (for more information, please read our Government Access Policy)
- if we merge with or are acquired by another company

Additionally, almost every merchant using the Orderus platform also uses non-Orderus services to support their business (for example, apps from our app store, sales channels, payment gateways, or shipping providers).

Orderus doesn’t control how these services use your personal information, and you should review any other service you use to make sure it meets your privacy expectations.

[Your rights over your information](#)

We believe that you should be able to access and control your own personal information no matter where you live. You can access and correct a lot of your personal information directly through the Orderus admin. For information you are not able to access or correct directly within the Orderus admin, please submit a data subject request through our online portal.

Because we need your personal information to provide Orderus services, we generally keep your personal information while you use Orderus products or services. If you close your store, you stop paying your subscription fees, or we terminate your account, we retain store information for two years before we begin the personal information purge process. We don't do this immediately in case you reactivate your account, or if there is a legal complaint or audit relating to your business. If you contact us to request deletion of your store's information, we will begin the personal information purge process after 90 days, except if we are legally required to retain specific information. If you have questions about this process, please contact our Support team. Please keep in mind that after we anonymize your personal information, we may continue to use non-identifiable information to improve our services.

[Your customers' information](#)

In order to power your business, we collect and use personal information about your customers. In general, we only collect and use this personal information as directed by you. Legally speaking, we are a "data processor" and a "service provider". We will never use your customers' information to independently market or advertise to your customers unless they are also using one of our applications or services directly.

Because you decide how the personal information of your customers will be used, you need to make sure your customers understand how you (and how we on your behalf) collect and process their personal information. You should do this by, at a minimum, posting a privacy policy on your store that describes the information you collect, how you use it, and who you share it with.

To help get you started with this, you can check out our privacy policy generator. Also, if you are collecting any "sensitive" personal information from your customers (for example, information about health, race, ethnicity, genetics, biometrics, trade union membership, political opinions, philosophical or religious beliefs, criminal history, or sexual interests), you should get the affirmative, express consent from your customers to use and process this information.

Privacy for Customers

[What information we collect about you and why](#)

Please note that Orderus will never use your personal information to independently market or advertise to you, unless you are using one of our apps or services directly.

What we collect	How we use it
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<p>Information you provide about yourself like your name, billing address, shipping address, email address, phone number, and payment information.</p>	<p>To provide merchants with our services, and enable them to operate their business—e.g., to allow them to complete a transaction, screen orders for fraud and risk, fulfill orders, and contact you with new products or offers</p>
<p>Information about how you access our websites, your account, and our platform, including information about the device and browser you use, your network connection, your IP address, and details about how you browse through our websites and platform. We collect some of this information by using “cookies” or other similar technologies directly from your device. For more information about how we use these technologies, see our Cookie Policy.</p>	<p>To provide merchants with our services, and enable them to operate their business (e.g., to provide them with analytics about how many people visit their store, and to help them troubleshoot and improve their store)</p>
<ul style="list-style-type: none"> • what you purchased • your order mode • date, time of purchase • amount paid for order • pick up information (such as distance and route) • payment method • team or group with which you placed an order • in-App notes or discussions • whether you used a promotion code 	<p>Transaction Data (e.g. the history of your purchases and your order details.</p>
<p>(e.g. any information you submit about our restaurants including ratings, tags, reviews, photos or comments, team discussions through the Website or App, tags, team members, team photos, your preferences in receiving emails and direct marketing from us, and information you submit when you contact Orderus support). This information is generally collected from you or from third parties, including your team members.</p>	<p>Communications or Marketing</p>
<p>(e.g. if you choose to participate in one of our User surveys or research initiatives, we collect your answers and use the information and survey results to help us understand our users and tailor our service offerings). This information is generally collected from you.</p>	<p>Survey Data</p>

[When and why we share your information with others](#)

We use service providers to help us provide services to our merchants or Venue. Outside of these service providers, we will only share your information if we are legally required to do so (for example, if we receive a legally binding court order or subpoena), or where a Orderus merchant instructs us to share information on their behalf. If you have questions about how a merchant or store shares your personal information, you should contact the merchant or visit their privacy policy.

[Your rights over your information](#)

When you visit or make a purchase from a merchant's Orderus-powered store, the merchant you're visiting or buying from legally controls your information. As a result, Orderus doesn't, for example, decide how long your information is retained because that decision is made by the merchant. This means Orderus can't help you access, correct, erase, or port your information without being directed to by the merchant. To make a request about your personal information, contact the specific merchant directly. If you make a request to us, we will forward your request to the relevant merchant and help them fulfill your request. If the merchant no longer exists, however, we may be able to assist you directly.

Privacy for Users of Orderus Apps

[What information we collect about you and why](#)

Orderus collects the following personal information about you when you use one of our apps:

What we collect	How we use it
Information you provide about yourself, like your name, address, email address, and phone number.	To provide you with - and improve - the app or service you are trying to use (e.g., to confirm your identity, to contact you about our products or services, to complete transactions)
	To pre-fill order information if you are trying to checkout through a Orderus-powered store
	To provide you with recommendations of other stores near the addresses you provide
	To advertise and market Orderus services or features to you
	To determine if you are eligible for specific offers or payment methods
	To comply with legal requirements
If using Shop: Information about your device's precise location, but only when you allow Shop to access this information.	To provide you with recommendations of stores near your device's location

<p>If using Shop: Information about purchases you have made through Orderus stores, which we access from Orderus’s platform.</p>	<p>To provide and improve Shop -- in particular, to identify specific orders you have made, so that we can display those orders and related information (e.g., a list of stores you have made purchases from)</p>
	<p>To personalize your experience using our apps and services (e.g., by changing how we may order items that we show you)</p>
	<p>To determine if you are eligible for specific offers or payment methods</p>
	<p>To detect, prevent or otherwise address fraud</p>
	<p>We do NOT use this information to provide you with marketing or advertising from other stores or services</p>
<p>Information about how you access and use Orderus apps, websites, and other services, including information about the device and browser you use, your network connection, your IP address, submissions through the app, and details about how you browse through our apps and sites. We collect some of this information by using “cookies” or other similar technologies directly from your device. For more information about how we use these technologies, see our Cookie Policy.</p>	<p>To provide you use of, and to improve, our apps and services (e.g., identifying ways to make our platform easier to use or navigate)</p>
	<p>To personalize your experience using our apps and services (e.g., by changing how we may order items that we show you)</p>
	<p>To advertise and market products or features to you</p>
	<p>To maintain the security of the service</p>
	<p>To detect or prevent fraud or spam</p>
<p>Copies you provide of your government-issued identification.</p>	<p>To verify that we are speaking with you if you contact us</p>
	<p>To comply with legal requirements</p>

[When and why we share your information with others](#)

When you use Shop or another Orderus app to make a purchase, we share your personal information with the specific merchant from whom you make the purchase. When you use Shop to log in or sign up to a merchant’s website or other offering, we share your personal information with the specific merchant to whose website or other offering you log in or sign up. We also rely on a number of service providers, including our subprocessors, to help us provide you with our services, which often requires us to share personal information. We also share your personal information with others:

- to prevent or investigate suspected fraud, threats to physical safety, illegal activity, or violations of a contract (like our Terms of Service) or our policies (like our Acceptable Use Policy)

- to help us conduct marketing and advertising (although if you use Shop we DO NOT share information from your connected email account or from purchases you have made through Orderus stores to help us market or advertise to you)
- to comply with legal requirements, or to respond to court orders or other similar government demands (for more information, please read our Government Access Policy)
- if we merge with or are acquired by another company

Your rights over your information

We believe that you should have the right to access and control your own personal information no matter where you live. We generally retain your personal information until you stop using the app in question and inform us that you would like your personal information to be deleted. If you would like to access or request that we delete your personal information, and you use any of the below services, please follow the instructions below:

- If you use Shop: To make a request to access your information or another type of request, please submit a data subject request through our online portal
- If you receive newsletters or marketing from us: please click 'Unsubscribe' from the bottom of those emails
- For all other services, please submit a data subject request through our online portal

Please keep in mind that after we anonymize your information, we will continue to use aggregated non-identifiable information to improve our services.

Privacy for Orderus Visitors

What information we collect about you and why

We collect the following personal information about you when you visit one of our websites or contact Orderus support:

What we collect	How we use it
Information about you that you provide us about yourself, like your name, address, email address, and phone number.	To provide you use of, and to improve, the app or service you are trying to use (e.g., to confirm your identity, to contact you about issues with the platform, to invoice you)
	To verify that we are speaking with you
	To advertise and market products or features to you
	To comply with legal requirements
Information about how you access and use Orderus apps, websites, and other services, including information about the device and browser you use, your network connection, your IP address, and details about how you browse through our apps and sites, including search terms you may enter. We collect some of this	To provide you use of, and to improve, our websites and related services (e.g., identifying ways to make our platform easier to use or navigate)
	To personalize your experience using our websites (e.g., by changing the layout of our webpages)

information by using “cookies” or other similar technologies directly from your device. For more information about how we use these technologies, see our Cookie Policy.	To advertise and market products or features to you
	To provide app developers aggregated analytics relating to their app listing on Orderus’s App Store
Copies of your government-issued identification.	To verify that we are speaking with you if you contact us
	To comply with other legal requirements

[When and why we share your information with others](#)

We share your personal information with companies who help us provide you with our services. We also share your personal information with others:

- to prevent or investigate suspected fraud, threats to physical safety, illegal activity, or violations of a contract (like our Terms of Service)
- to help us conduct marketing and advertising
- to comply with legal requirements, or to respond to court orders or other similar government demands (for more information, please read our Government Access Policy)
- if we merge with or are acquired by another company

[Your rights over your information](#)

We believe that you should have the right to access and control your own personal information, no matter where you live. We retain your personal information until you tell us to delete it. Please submit a data subject request through our online portal if you would like to access or request that we delete your personal information. Please keep in mind that after we anonymize your information, we will continue to use non-identifiable information to improve our services

3. Why we process your information

We generally process your information when we need to do so to fulfill a contractual obligation (for example, to process your subscription payments to use the Orderus platform), or where we or someone we work with needs to use your personal information for a reason related to their business (for example, to provide you with a service). European law calls these reasons “legitimate interests.” These “legitimate interests” include:

- Preventing risk and fraud
- Answering questions or providing other types of support
- Helping merchants find and use apps through our app store
- Providing and improving our products and services
- Providing reporting and analytics

- Testing out features or additional services
- Assisting with marketing, advertising, or other communications

We only process personal information for these “legitimate interests” after considering the potential risks to your privacy—for example, by providing clear transparency into our privacy practices, offering you control over your personal information where appropriate, limiting the information we keep, limiting what we do with your information, who we send your information to, how long we keep your information, or the technical measures we use to protect your information.

We may process your personal information where you have provided your consent. In particular, where we cannot rely on an alternative legal basis for processing, where your data is sourced and it already comes with consent or where we are required by law to ask for your consent in the context of some of our sales and marketing activities. At any time, you have a right to withdraw your consent by changing your communication choices, opting out from our communications or by contacting us.

4. Information we collect about you

We receive personal information about you that you give to us (e.g. contact details and correspondence), that we collect from your use of the Sites (e.g device and Site activity data) and that we obtain from other sources. We only collect personal information that we need and that is relevant for the purposes for which we intend to use it.

Personal information you give us

This is information about you that you give to us by visiting our Sites, by corresponding with us via email or other means. This information is provided by you entirely voluntarily. The information you give to us can include your name, contact details (such as phone number and email address) and any personal information you include when corresponding with us, including your feedback on our Sites and services.

We may process health information about you in circumstances where you voluntarily provide such information, for example if you report any specific food allergies when placing an order on our customer-ordering websites.

If you do not provide this information to us we may be unable to resolve your queries or otherwise communicate effectively.

Information we collect about you from your use of our Sites

When you use our Sites, we collect the following information:

- visiting frequency, pages visited and other traffic analytics information;
- your internet protocol (IP) address, device ID, device type, browser version and location data; and

If you do not provide this information to us you may be unable to use the Sites or some of its features.

Information we collect about you from other sources

We may obtain certain information about you that is available publicly. We obtain this either directly from websites published online or from third party data brokers who have themselves obtained your personal information from publicly available sources. We use this information in each case, only to the extent permitted by data protection law.

5. Use of your personal information

We use your personal information for a variety of reasons. We rely on different legal grounds to process your personal information, depending on the purposes of our use and the risks to your privacy. You will always have the option to choose not to receive marketing communications from us and can opt-out of these at any time.

Data protection law requires us to have valid legal grounds (known as 'lawful bases') to process your personal information for each of the different purposes for which we use it. The purposes for which we use your personal information, which we have categorised by the legal grounds on which we rely, is as follows:

5.1 Where you have provided CONSENT

We may use and process your personal information to contact you with marketing communications that you have specifically requested from us on the grounds that you have **consented** for us to do so.

You may withdraw your consent for us to use your information in any of these ways at any time. Please see Your rights over your personal information for further details.

5.2 Where required to comply with our LEGAL OBLIGATIONS

We will use your personal information to comply with our obligations under the law including to keep a record relating to the rights you exercise in connection with our processing of your personal information.

5.3 Where processing is necessary for us to pursue a LEGITIMATE INTEREST

We may use and process your personal information where it is necessary for us to pursue our legitimate interests as a business for the following purposes:

Processing necessary for us to promote our business

- to contact you by email or by telephone with marketing information about our Sites (other than where we have asked you for your consent). We will use your personal information to tailor or personalise the marketing communications you receive to make them relevant to you and also to send targeted marketing messages via social media and other third party platforms, which may involve sharing your personal information with those platforms; and
- to create a profile of you and analyse this to obtain insight about market or industry trends or user behaviours which inform our marketing strategy, and to enhance and personalise your experience, including the marketing communications you receive from us.

Processing necessary for us to support enquiries from users of our Sites

- to correspond and communicate with you in connection with the Sites;
- to identify ways of improving your experience of the Sites; and
- to train and monitor our staff and to identify ways of improving your customer service experience;

Processing necessary for us to respond to changing market conditions and our customers' needs

- for market research, insight and intelligence in order to improve our understanding of our market and industry; and
- to analyse patterns of use, determine where we should focus our efforts through processing anonymised and aggregated data and to monitor the features of the Sites that have been used most frequently.

Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively

- to authenticate your access to the Sites;
- to resolve technical issues and provide the most-up to date version of the Sites, with improved features;
- to administer the Sites and for internal operations, including troubleshooting, testing and statistical reporting purposes;
- for the detection and prevention of fraud and other criminal activities and to apprehend offenders;
- to verify the accuracy of information we hold about you and create a better understanding of you as a customer;
- for network and information security purposes in order for us to take steps to protect your information against loss or damage, theft or unauthorised access;
- to comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on a suppression list to be able to comply with your request);
- for the purposes of a corporate restructure or reorganisation or sale of our business or assets;
- for efficiency, accuracy or other improvements of our databases and systems e.g. by combining systems or consolidating records we hold about you;
- to enforce or protect our contractual or other legal rights or to bring or defend legal proceedings; and
- for general administration including managing your queries, complaints, or claims, to send service messages and to provide you with important information about our business.

6. Disclosure of your personal information by us

We only disclose your personal information outside our business in limited circumstances. If we do, we will put in place a contract that requires recipients to protect your personal information, unless we are legally required to share that information. Any contractors or recipients that work for us will be obliged to follow our instructions. We do not sell your personal information to third parties.

As the controller of your personal information, we decide why and how it is processed. Our responsibility for that processing extends to processing by our service providers if they process your personal information based on our instructions. We also work with other organisations in connection with some of the processing activities described in this statement, such as our group companies, social media platforms and certain suppliers.

Where that personal information is collected and sent to other organisations for a processing purpose that is in both our and their interests or where we make decisions together in relation to that particular processing, we will be “joint controllers” with the organisations involved. This includes for example, disclosing your personal information to our customers (the ‘Venue’ or “Store Owner”) with whom you are placing an order so that you can be supplied with the relevant goods and services. Where this applies, we and the other organisation will be jointly responsible to you under data protection law for this processing. If we pass your personal information to an organisation that independently decides why and how to use your personal information (such as payment service providers and certain Venues) then it will be separately responsible to you for that processing and use your personal information in the ways described in its privacy policy (and not ours).

We may disclose your information to our third party service providers, agents and subcontractors (**Suppliers**) for the purposes of providing services to us or directly to you on our behalf, including the operation and maintenance of our Sites and social media pages. Our Suppliers can be categorised as follows:

Recipient / relationship to us	Industry sector (& sub-sector)
Advertising, PR, digital and creative agencies	Media (Advertising & PR)
Cloud software system providers, including database, email and document management providers	IT (Cloud Services)
Customer care/service providers	Customer Services (Support)
Delivery and mailing services providers	Logistics (Delivery Service)
Facilities and technology service providers including scanning and data destruction providers	IT (Data Management)
Social media platforms	Media (Social Media) - see further Our use of social media
Insurers and insurance brokers	Insurance (Underwriting & Broking)
Legal, security and other professional advisers and consultants	Professional Services (Legal & Accounting)

When we use Suppliers, we only disclose to them any personal information that is necessary for them to provide their services and only where we have a contract in place that requires them to keep your information safe and secure.

We may disclose the personal information to other third parties as follows:

- any third party who is restructuring, selling or acquiring some or all of our business or assets or otherwise in the event of a merger, re-organization or similar event; and
- if we are under a duty to disclose or share your information in order to comply with any legal or regulatory obligation or request, including by the police, courts, tribunals or regulators.

7. Transfers of your personal information outside of Australia

We may transfer your personal information outside of Australia. If we do disclose personal information to other overseas persons or entities, we will take reasonable steps to ensure that the overseas recipients of your personal information do not breach the data protection law relating to your personal information.

If we transfer your information outside of Australia, we will take steps to ensure that appropriate measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this policy. These steps include selecting recipients located in countries that have been declared adequately protective of your personal information by the relevant authorities or ensuring that the recipients are subscribed to 'international frameworks' that aim to ensure adequate

protection. Where they do not, we ensure that we impose contractual obligations on them that are broadly equivalent as required by data protection law. Please contact us using the details at the end of this policy for more information about the protections that we put in place and to obtain a copy of the relevant documents.

8. Security and links to third parties

We take the security of your personal information seriously and use a variety of measures based on good industry practice to keep it secure. Nonetheless, transmissions to and from our Sites may not always be completely secure, so please exercise caution.

We employ security measures to protect the information you provide to us, to prevent access by unauthorised persons and unlawful processing, accidental loss, destruction and damage.

If you suspect any misuse or loss of, or unauthorised access to, your personal information, please let us know immediately.

If we suspect any misuse or loss of, or unauthorised access to, your personal information we may inform you of that suspicion and take immediate steps to limit any further access to, or distribution of, your personal information. If we determine that the breach is likely to result in serious harm to you and we are unable to prevent the likely risk of serious harm with remedial action, we will take action in accordance with data protection law.

If we receive unsolicited personal information that we are not permitted to collect under this privacy policy, or within the confines of the law, we will destroy or de-identify the unsolicited personal information as soon as practicable if it is lawful and reasonable to do so. We will destroy or de-identify your personal information if we no longer require it to deliver our services as soon as practicable if it is lawful and reasonable to do so.

9. Do we use “cookies”?

When you use our Sites, we may obtain information using technologies such as cookies, tags, web beacons, and navigational data collection (log files, server logs, and clickstream data) to better understand your user experience. For example, we may collect information like the date, time and duration of visits and which Sites are accessed.

When you access our Sites, we may send a “cookie” (which is a small summary file containing a unique ID number) to your computer or mobile device. This enables us to recognise your computer or device and greet you each time you visit our Sites, without bothering you with a request to register or log-in. It also helps us keep track of products or services you view, so that we can send you news about those products or services.

We also use cookies to measure traffic patterns, to determine which areas of our Sites have been visited, and to measure transaction patterns in the aggregate. We use this to research our users' habits so that we can improve our online services. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.

We may also log IP addresses (the electronic addresses of computers connected to the internet) to analyse trends, administer the Sites, track user movements, and gather broad demographic information.

This information is generally not linked to your identity, except where it is accessed via links in our emails to you, or where you have otherwise identified yourself. We may also collect anonymous data (which is not personal information) relating to your activity on our Sites (including IP addresses) via cookies. We generally use this information to report statistics, analyse trends, administer our services, diagnose problems and target and improve the quality of our services. To the extent this information does not constitute personal information because it does not identify you or anyone else, the data protection law does not apply and we may use this information for any purpose and by any means whatsoever.

10. What do we do with guest register data?

If we obtain guest register data for contact tracing purposes, we store it for 56 days which is the maximum requirements in Australia and New Zealand. This is stored in a separate database to transactional user data. After 56 days, the data is deleted from the database.

We share this guest register data securely with the Venue or Store Owner so they can verify that you have correctly registered.

We may also provide this information to the State Government via manual file transfer or by API integration to support broader contact tracing initiatives.

11. The periods for which we retain your personal information

We will not hold your personal information in an identifiable format for any longer than is necessary for the purposes for which we collected it. The periods for which we hold your personal information will depend on the type of personal information. These periods also apply where we share your information with suppliers who process your personal information on our behalf.

We retain your personal information for the purposes of accounting purposes for up to 7 years from the date we no longer require it for the purposes listed above.

The only exceptions to the period mentioned above are where:

- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law (see further Your rights over your personal information);
- we bring or defend a legal claim or other proceedings during the period we retain your personal information, in which case we will retain your personal information until those proceedings have concluded and no further appeals are possible;
- your account is subject to an investigation of criminal or fraudulent activity; or
- in limited cases, existing or future law or a court or regulator requires us to keep your personal information for a longer or shorter period.

We also retain an anonymised version of the submitted personal information for as long as we require it for reporting and other statistical and analytical purposes. Such anonymised information will not identify you and may be derived from personal information that was contained within accounts that have subsequently been deleted.

12. Your rights over your personal information

You have a number of rights in relation to your personal information under data protection law. In relation to certain rights, we may ask you for information to verify your identity and, where applicable, to help us to search for your personal information. Except in rare cases, we will respond to you within one month after we have received this information or, where no such information is required, after we have received full details of your request.

You have the following rights, some of which may only apply in certain circumstances:

- to **be informed** about the processing of your personal information (this is what this Privacy Policy sets out to do);
- to have your personal information **corrected if it is inaccurate** and to have **incomplete personal information completed**;

The accuracy of your information is important to us and we are working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change your name or email address, or you discover that any of the other information we hold is inaccurate or out of date, please let us know by emailing or writing to us at the address at the end of this policy.

- to object to processing of your personal information;

Where we rely on our legitimate interests as the legal basis for processing your personal information for particular purposes, you may object to us using your personal information for these purposes by emailing or writing to us at the address at the end of this policy. Except for the purposes for which

we are sure we can continue to process your personal information, we will temporarily stop processing your personal information in line with your objection until we have investigated the matter. If we agree that your objection is justified in accordance with your rights under data protection law, we will permanently stop using your data for those purposes. Otherwise we will provide you with our justification as to why we need to continue using your data.

You may object to us using your personal information for direct marketing purposes and we will automatically comply with your request. If you would like to do so, please click on the unsubscribe message on our emails.

- to **withdraw your consent** to processing your personal information;

Where we rely on your consent as the legal basis for processing your personal information, you may withdraw your consent at any time by contacting us, using the details at the end of this policy. If you would like to withdraw your consent to receiving any direct marketing to which you previously opted-in, you can also do so using our unsubscribe tool. If you withdraw your consent, our use of your personal information before you withdraw is still lawful.

- to **restrict processing** of your personal information;

You may ask us to restrict the processing of your personal information in the following situations:

where you believe it is unlawful for us to do so, you have objected to its use and our investigation is pending or you require us to keep it in connection with legal proceedings.

In these situations, we may only process your personal information whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.

- to have your personal information **erased**;

In certain circumstances, you may ask for your personal information to be removed from our systems by emailing or writing to us at the address at the end of this policy. Unless there is a reason that the law allows us to use your personal information for longer, we will make reasonable efforts to comply with your request.

- to **request access** to your personal information and information about **how we process it**;

You have the right to ask for a copy of the information that we hold about you by emailing or writing to us at the address at the end of this policy. We may not provide you with a copy of your personal information, if this concerns other individuals or we have another lawful reason to withhold that information.

- to **electronically move, copy or transfer** your personal information in a standard form (*data portability*); and

Where we rely on your consent as the legal basis for processing your personal information, you may ask us to provide you with a copy of that information in a structured data file. We will provide this to you electronically in a structured, commonly used and machine readable form, such as a CSV file.

You can ask us to send your personal information directly to another service provider, and we will do so if this is technically possible. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.

- rights relating to **automated decision making**, including profiling.

We do not envisage that any significant decisions will be taken about you using purely automated means, however we will update this policy if this position changes.

To exercise these rights, please let us know by emailing or writing to us at the address at the end of this policy.

You have the right to request that an independent person (usually the Commonwealth Privacy Officer) investigate where your personal information has or is being used in a way that you believe does not comply with data protection law. However, we encourage you to contact us before making any complaint and we will seek to resolve any issues or concerns you may have.

13. Changes to our Privacy Policy

We may review this policy from time to time and any changes will be notified to you. Any changes will take effect 30 days after we post the modified terms on our Sites. We recommend you regularly check for changes and review this policy when you visit our Sites. If you do not agree with any aspect of the updated policy, you must promptly notify us and cease visiting our Sites.

14. Contact and legal information

You can contact us with your queries in relation to this policy or for any other reason at any time.

To contact us for any reason, including to exercise any of your rights in relation to your personal information, please write to the Privacy Office at the correspondence address below or email us at support@orderus.au.