



## Plenty Privacy Policy

*Last modified: 24 July 2023*

This privacy policy (**Policy**) applies to **Plenty Holdings Ltd t/a Plenty Gifting Australia** (ABN 65 645 065 88) (**Plenty, we, us or our**), and explains how we collect, hold, use and disclose personal information and sensitive information. It does not apply to our employee records that are directly related to our employment relationship.

By accessing or using our products, services and sites, you signify that you have read, understood, and agree to our collection, storage, use, and disclosure of your personal information as described in this Policy and our "**Terms of Use**" (located here, [XXXX](#)).

### 1. WHAT PERSONAL INFORMATION DO WE COLLECT AND HOLD?

The kinds of "**personal information**" (being information that is an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable) that we may collect and hold can vary depending on who you are and the services we are providing, but can include:

- your name, date of birth, gender, email address, postal address and delivery address (if different);
- if you register for an account with us, your username and password;
- where you are to be a recipient of a meal, your dietary requirements and details of any allergies;
- any relevant billing or account information (including but not limited to bank account details, direct debit, credit card details and billing addresses) that you provide us, including as part of making a purchase or charitable donation through our website;
- information relevant to our products or services that have been provided to you or that you have shown interest in;
- other information such as your opinions, statements and endorsements collected personally or via surveys and questionnaires, including but not limited to your views on the products and services offered by us; and
- other information that you may provide to us (including in the course of communication with us) or which is provided to us by third parties (including our business partners) either on our request and/or your behalf.

"Sensitive information" is personal information which may include, but is not limited to, health information and information about your racial or ethnic origins or political or religious beliefs. Unless otherwise permitted by law, we will not collect sensitive information about you without your consent.

If you apply for a job through our website or through some other channel, we collect the information you include in your application, which could include your name, address, phone number, email address as well as information regarding your work/education background and history and other such information. We may also obtain information about you from you, or your references and from other third parties such as educational organizations, law enforcement agencies and previous employers in order to obtain records about you and verify the information that you have provided.

## 2. HOW DO WE USE PERSONAL INFORMATION?

We may use your information in the instances and for the primary purposes described below.

- **To fulfill your requests and provide our services, products and website.** For example, we may use your information to complete your purchase of a meal gift certificate or order of a meal. We may also use your information to respond to your customer service request or feedback, to personalize your experience with us and for internal record keeping, business, administrative and invoicing and billing purposes.
- **For marketing purposes.** For example, we may send you communications about special offers, products and services. We may also use individual and aggregate information about you to inform our marketing and advertising campaigns. For more information on your choices about marketing communications, see "Your Choices and Control Over Your Information" below.
- **To allow you to participate in promotions, competitions and other related activities.** From time to time, we may run promotions, competitions, loyalty initiatives and conduct other activities relating to customer behavior. We will use information that we have collected about you to do this, including to provide you information about these initiatives, manage the initiatives and allow you to access any benefits you may have obtained through these initiatives.
- **To communicate with you.** For example, we may communicate with you to handle enquiries and feedback, and to get in contact with you in relation to a purchase or donation so that we can provide our services and products. There may be other reasons why we communicate with you - for more information on how you can affect this, see "Your Choices and Control Over Your Information" below.
- **To monitor, improve and develop our products and services and relationship with you.** We may use your information to better understand the people who engage with us and our customers, and to improve our Services and tailor our product offerings accordingly.
- **To process and consider applications.** We collect and use the personal information of applicants (whether this is to be a contractor, employee, partner or otherwise) to evaluate their application and the suitability of the applicant. We may retain an applicant's personal information for a reasonable time period after the date of application for the purpose of assessing an individual's suitability for other employment opportunities within our organization, though we have no obligation to do so.
- **To protect the security and integrity of our business, comply with legal requirements and obligations, or as otherwise permitted by law.** We may use information to protect our company, our affiliates, our customers, and our websites. We may also use information in order to comply with laws, regulations, court orders, or other legal obligations or to assist in an investigation, to protect and defend our rights and property, or the rights or safety of third parties, to enforce our Terms of Use, this Policy, or agreements with third parties, to detect and prevent fraud or for crime-prevention purposes, or for any other reason permitted by law. Where we collect images and video, we may use this footage for security,

fraud, incident reporting and loss-prevention purposes, or to collect analytics, improve operations and other purposes.

We may also use your personal information for other purposes not listed above which will be made clear to you at the time we collect your personal information, or for such purposes as may be required or permitted by law.

To the extent that sensitive information is collected by us (and noting that we do not routinely collect sensitive information), we will only use and disclose this information for any purposes you consent to; or as otherwise permitted, required or authorized by law.

### 3. COOKIES

When you come to one of our websites, our server attaches a small text file to your hard drive known as a "**cookie**". A cookie assigns you a unique identifier so that we recognize you each time you re-enter the website, so we can recall where you have previously been on our site, and which keeps track of the pages you view on the website. Cookies collect information which can include personal information and this information helps us deliver a better website experience to our users.

You have choices with respect to cookies, and our collection and use of personal information through those cookies. By modifying your browser preferences, you have the choice to accept all cookies, to be notified when a cookie is set, or to reject all cookies. If you choose to reject all cookies you will be unable to use those services or engage in activities that require the placement of cookies. Certain aspects of the site may not function properly if you set your browser to reject all cookies and/or prevent our collection and use of Personal Information through cookies.

### 4. HOW WE SHARE YOUR INFORMATION

We may share, sell or disclose your information in the instances described below. For further information on your choices regarding your information, see "Your Choices and Control Over Your Information" below.

- **If you purchase a meal gift certificate, to the recipient.** Certain limited personal information, including your name and your personal note (if included) will be passed to the recipient of your meal gift certificate.
- **The public.** When you provide feedback or post user content on our websites and online platforms (e.g., if you post a product review or comment on our social media sites), your information may be displayed for the public to see. When you engage with us on social media, we may tag your social media account or the social media account of others (e.g., to give photo credit to another user).
- **With your consent or at your direction.** In addition to the sharing described in this Policy, we may share information about you with third parties whenever you consent to or direct such sharing.
- **Our related entities, business partners, service providers and advisors.** Personal information may be shared with third party vendors, advisors and other service providers who perform services for us or on our behalf. This may include vendors and providers who engage in marketing or advertising activities or provide mailing or email services, tax and accounting services, product fulfillment (for example, the restaurants/catering companies creating the meals), delivery services (for example, the couriers who deliver the meals), payments processing, data enhancement services, fraud prevention, web hosting, or analytic services. It will also include disclosure to our professional advisors and insurers in the course of obtaining professional advice or making claims under our insurance.
- **Purchasers and third parties in connection with a business transaction.** Personal information may be disclosed to third parties in connection with a corporate transaction, such as a merger, sale of any or all of our company assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business by an affiliate or third party, or in the event of a bankruptcy or related or similar proceedings.

- **Law enforcement, regulators and other parties for legal reasons.** Personal information may be disclosed to third parties, as required by law or subpoena, or if we reasonably believe that such action is necessary to: (a) comply with the law and the reasonable requests of law enforcement; (b) to enforce our Terms of Use or to protect the security or integrity of our Service; and/or (c) to exercise or protect the rights, property, or personal safety of our organization, our visitors, or others. Examples of when such a disclosure may occur, include in relation to an investigation of a person or food safety or health issue investigation in relation to compliance with public health orders).

In connection with the above, we may share information with others in an aggregated or otherwise anonymized form that does not reasonably identify you.

## 5. YOUR CHOICES AND CONTROL OVER YOUR INFORMATION

**Your right not to provide personal information.** You do not have to provide personal information to us, however, if you do not then it may affect our ability to provide our Services to you and your use of our Services.

**Profile and settings.** You may update your account information and adjust your account settings by logging into your account. Please note that changes to your settings may require some time to take effect.

**How to control your email preferences.** You can stop receiving promotional email communications from us by clicking on the “unsubscribe link” provided in such communications or by using the information in the “How to Contact Us” section below. We make every effort to promptly process all unsubscribe requests. You may not opt out of service-related communications (e.g., account verification, transactional communications, changes/updates to features of the Service, technical and security notices). You may also be able to adjust certain communications preferences by logging into your account.

**Geolocation and device Information.** You may control the Service’s access to your device information through your “Settings” app on your device. For instance, you can withdraw permission for the Service to access your address book, location, photo stream, and camera. You may also control precise location tracking by adjusting your location services settings on your mobile device. We may continue to approximate your location based on your IP address or through other means when you access the Service through a computer or device.

**Anonymity:** You have the option of not identifying yourself, or to use a pseudonym when dealing with us. However, in some cases it will not be practicable to deal with you anonymously or using a pseudonym, including when you have elected to receive direct marketing materials or requested delivery of products or services from us, in which case we may be unable to provide you with materials, products or services if you do not identify yourself.

## 6. HOW WE STORE AND PROTECT YOUR INFORMATION

**Data storage and transfer.** Your information collected through our services may be stored and processed in Australia or any other country that a third party that we share your personal information is located in.

**Data retention:** We will retain your personal information as long as reasonably necessary to maintain the services, to meet legal and accounting obligations, and for the other purposes described in this Policy. We may anonymize and/or aggregate personal information and store it in order to analyze aggregate metrics and trends.

**Keeping your information safe:** Security of your information is very important to us, and we have put in place safeguards to preserve the integrity and security of information we collect and share with our service providers. However, no security system is impenetrable and we cannot guarantee the security of our systems at all times. In the event that any information under our control is compromised as a result of a breach of data security, we will take reasonable steps to investigate the situation and, where appropriate, notify those individuals whose information may have been compromised and take additional steps, in accordance with any applicable laws and regulations.

## **7. OVERSEAS DISCLOSURES**

Your personal information may be disclosed to employees, representatives, or other third parties operating outside of Australia who work for, or are engaged by Plenty in other countries. In disclosing your personal information overseas, we will take such steps as are reasonable in the circumstances to require that overseas recipients protect your personal information in accordance with the Australian Privacy Principles.

## **8. LINKS TO OTHER WEB SITES AND SERVICES**

Our websites and online platforms may contain links to and from third party websites of our business partners, advertisers, and social media sites and our users may post links to third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability resulting from you following a link these websites. Additionally, other privacy policies may apply when you interact with one of our partners (for example, make a charitable donation to one of our Community Program Partners). We strongly recommend that you read the privacy policies and terms and conditions of use of any third party website or service to understand how your information will be collected, used and shared. We are not responsible for the privacy practices or the content on the websites of third-party sites.

## **9. ACCESS AND CORRECTION OF YOUR PERSONAL INFORMATION**

You may, at any time, request access to and correction of any personal information we hold about you by contacting us (refer to the "How to Contact Us" section below).

We take reasonable steps to ensure your personal information is accurate, up-to-date and not misleading by updating our records whenever changes to the data come to our attention.

## **10. HOW TO CONTACT US**

If you have any questions or complaints about how we handle your personal information or a breach of the Australian Privacy Principles or wish to access or correct personal information we hold about you, please contact us at:

Plenty Holdings Ltd t/a Plenty Gifting Australia  
PO Box 3120  
Lesmurdie WA 6076

Telephone: 1300 588 052 (9.00am to 5.00pm AWST, Monday to Friday)  
Email: [hello@plentygifting.com.au](mailto:hello@plentygifting.com.au)

Website: [plentygifting.com.au](http://plentygifting.com.au) (please complete the form located on the "Contact Us" webpage)

We will consider your question or complaint and endeavor to respond to you in a reasonable timeframe. If you are not satisfied with our response, you also have the right to contact the Office of the Australian Information Commissioner.

## **12. CHANGES TO THIS POLICY**

We may modify or update this Policy from time to time to reflect the changes in our business and practices, so you should review this Policy periodically. When we change this Policy in a material manner, we will so indicate by updating the "last modified" date in the heading of this Policy. If you object to any changes in this Policy, you may close your account associated with the Service.