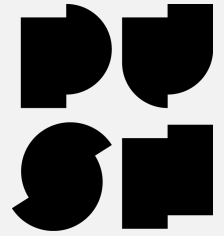


PRIVACY POLICY

LAST REVISED: 26 MARCH 2019



1. Overview

- (a) PUSH Collective Pty Ltd (ACN 160 485 950) of 51 Victoria Street, Fitzroy VIC 3065 (**us/we/our**) operates a business (**Business**) which provides brand development and strategy, design, marketing, advertising, market research and other related services (**Services**). Our website is found at www.pushcollective.com (**website**).
- (b) We are committed to protecting the privacy of individuals (**you/your/yourself**) we interact with in connection with the provision of the Services, through the website and otherwise in relation to the operation of our Business.
- (c) We will handle Personal Information that we collect or obtain in connection with the provision of the Services in accordance with this Privacy Policy and Collection Policy (**Policy**) and the *Privacy Act 1988 (Cth)* (**Privacy Act**) and the Australian Privacy Principles which are set out in the Privacy Act (**Australian Privacy Principles**). Personal Information has the meaning as defined in the Privacy Act (**Personal Information**).
- (d) This Policy contains information about:
 - (i) how you may access and seek correction of your Personal Information held by us;
 - (ii) how to seek the correction of your Personal Information; and
 - (iii) how to make complaints about any privacy-related concerns.
- (e) This Policy also provides you with notice of the collection of your Personal Information by us.
- (f) If we change this Policy, we will display the updated Policy on the website and we may also advise you in writing. If you object to any changes, you may contact us and we will attempt to resolve your complaint within a reasonable time.
- (g) By using the Services or otherwise supplying us your Personal Information, you consent to our collection, use, disclosure, storage, destruction and otherwise handling of Personal Information, in accordance with the terms of this Policy and the Australian Privacy Principles.
- (h) If you provide a pseudonym to us or wish to remain anonymous, you can browse and view the website without restrictions, however we may not be able to provide you with the full extent of the Services and our interactions with you in relation to the Business may be limited. We may require that you accurately identify yourself so that we can take reasonable steps to provide accurate information as part of providing the Services (for example, we require our clients, suppliers and associates to provide accurate contact details).

2. How do we collect your Personal Information?

- (a) We may collect Personal Information through the following avenues:
 - (i) where you have enquired or otherwise communicated with us in person, over email or phone, via video conference or otherwise;
 - (ii) where you have filled out a form or answered questions posed by us in relation to any actual or prospective commercial engagement relating to the Business including during any briefing or quoting process;

- (iii) where you fill out a contract prepared by us or provide us with a contract prepared by you in relation to the Services or the Business;
- (iv) where you send us an invoice or other notification in relation to the Services or the Business;
- (v) where you agree that we can make voice and video recordings of you;
- (vi) from time to time from third parties, such as:
 - (A) when third parties (such as recruitment agencies, market researchers or other independent contractors) provide us with your Personal Information at your request or with your permission, for the purposes of us and the third parties carrying out market research projects and services; and
 - (B) when a third party is assisting us to supply the Services as our contractor or supplying us with goods or services;
- (vii) where you interact with the website, through the use of browser 'cookies' or trackers; and
- (viii) in such other situations that are reasonably necessary for the proper function of the Services.

3. What Personal Information do we collect?

- (a) The kind of Personal Information we may collect from you will depend on who you are (e.g. a client, supplier or market research participant) and the nature of your interaction with us.
- (b) We collect, use and store the following types of Personal Information:
 - (i) For current, former and prospective clients:
 - (A) contact details such as names, email addresses, phone numbers, office address, postal address and other geographical information;
 - (B) details about clients' employees, directors, contractors, agents and other representatives such as dates of birth, gender, email addresses, home addresses, phone numbers, titles and qualifications;
 - (C) photographs as well as voice and video recordings;
 - (D) business information such as banking details and business registrations; and
 - (E) other Personal Information that you may voluntarily provide to us to assist us to provide the Services to you.
 - (ii) For current, former and prospective suppliers:
 - (A) contact details such as names, email addresses, phone numbers, office address, postal address and other geographical information
 - (B) details about suppliers' employee, directors, contractors, agents and other representative such as dates of birth, gender, email addresses, home addresses, phone numbers, referees, employment history, salary expectations, psychographic testing, titles and qualifications;
 - (C) business information such as banking details, business registrations, pricing information, hourly rates and payment details;
 - (D) photographs as well as voice and video recordings; and
 - (E) other Personal Information that you may voluntarily provide to us to assist us to engage in a business relationship with you.

- (iii) For prospective employees:
 - (A) contact details such as names, email addresses, phone numbers, office address, postal address and other geographical information;
 - (B) details such as dates of birth, gender, titles and qualifications;
 - (C) photographs as well as voice and video recordings;
 - (D) information we obtain about you from background and reference checks; and
 - (E) other Personal Information that you may voluntarily provide to us to assist us to consider whether to employ you.
 - (iv) For market research participants:
 - (A) contact details such as names, email addresses, phone numbers, office address, postal address and other geographical information;
 - (B) details such as dates of birth, gender, titles and qualifications;
 - (C) sensitive information such as race, ethnicity, religious views, philosophical beliefs, union or trade membership, political opinions and beliefs, sexuality and health information;
 - (D) photographs as well as voice and video recordings; and
 - (E) other Personal Information that you may voluntarily provide to us when participating in market research projects in relation to our Business.
 - (v) information about our staff, representatives and officers as required in the normal course of human resource management and business operations; and
 - (vi) other Personal Information that you may voluntarily provide to us to assist us to conduct Business and provide the Services.
- (c) Where:
- (i) you wish to personally supply goods or service to us, engage us to provide Services to you or otherwise enter into a commercial relationship with us, you must provide accurate Personal Information to us as it will be impracticable for us to be involved in a commercial relationship with you unless you do so (for example, we would not be able to meet with you, discuss work with you, communicate with you by email and phone or send you draft and completed deliverables).
 - (ii) you are not an individual but wish to supply goods or service to us, engage us to provide Services to you or otherwise enter into a commercial relationship with us, you must provide accurate Personal Information to us of the individual representatives of your organisation, as it will be impracticable for us to be involved in a commercial relationship with you unless you do so (for example, we would not be able to meet with you, discuss work with you or communicate with you by email and phone).
 - (iii) you wish to participate in market research projects, you must identify yourself for security purposes, for us and our representatives to verify you, to maintain the integrity of the research data and to allow you to be involved in the next stage of the research project.

4. What do we do with your Personal Information?

- (a) We will not sell or trade your Personal Information to any third party, organisations or individuals without your consent, unless we are required or permitted to do so by law.
- (b) We may use and disclose your Personal Information for the following purposes:
 - (i) to discuss a current or prospective commercial relationship with you including the preparation of proposal documents, quotes and other pre-engagement material;

- (ii) to provide the Services,
 - (iii) to engage you to supply goods and/or services to us;
 - (iv) to pay you for any goods and/or services you supply to us;
 - (v) to prepare contracts, deeds or consent forms for you or your representatives to sign;
 - (vi) to operate the website;
 - (vii) to provide you with further information about the Services, as requested by you;
 - (viii) to personalise your experience of the Services;
 - (ix) to respond to feedback and complaints;
 - (x) for the development of new services or products;
 - (xi) for enforcement of a contract you have entered into with us or any agreement, undertaking, warranty or promise you have given us, such as our client terms and conditions, supplier terms and conditions, the website terms and conditions or interview release and consent forms;
 - (xii) for direct marketing purposes, with your consent (see section 8 below);
 - (xiii) to notify you of important changes to the Services or the website or to otherwise update you on matters relating to Business that may be of interest to you;
 - (xiv) to understand customer trends and patterns so we can continue to develop our marketing and advertising strategies; and
 - (xv) for any other purpose for which you give your consent.
- (c) Where we collect any sensitive information from a third party supplier about you as part of any market research project, we use the sensitive information to identify and validate that we have the correct research sample and to obtain a representation of a population's or sub-population's behaviour, needs, attitudes, opinions and motivations at a given point in time. Otherwise we do not use the sensitive information. Where we disclose any market research findings to our clients as part of the provision of the Services, we take all reasonable steps to ensure that the data output disclosed to clients is the aggregated opinion of target groups, rather than individuals or that the data is otherwise de-identified.
- (d) We may also disclose your Personal Information:
- (i) to third parties used by us to assist us to provide you with Services, including our freelance contractors, other contractors (such as book-keepers), market research providers, recruitment services providers, market research facilitators (such a venue operators), legal and financial advisors, website hosting provider and technology service providers; and
 - (ii) to any duly authorised law enforcement officer or any other person authorised by any law, or in circumstances permitted by the Privacy Act.

5. **How do we hold your Personal Information?**

We hold your Personal Information by storing it electronically, by exporting it onto a computer or in hard copy.

6. **Do we send your Personal Information to parties outside Australia?**

- (a) We use third-party service providers for cloud storage, webhosting, email hosting or other technology services (**IT Suppliers**). We note as of the date of this Policy, our email data is stored by Microsoft Office 365.

- (b) The IT Suppliers to whom we may disclose Personal Information may have servers in and operate out of locations outside Australia. As some of the IT Suppliers are of a global nature, we cannot say with certainty where their servers are located or the countries out of which they operate. Further, these locations may be subject to change without notice to us.
- (c) The Privacy Act and corresponding Australian Privacy Principle 8.1 requires us to ensure that, before disclosing Personal Information overseas, reasonable steps are taken to ensure that overseas recipients do not breach the Act or the all applicable APPs. It is not always possible for us to ensure that multinational companies, such as Microsoft which operate globally, will not breach the Privacy Act or the applicable APPs.

7. Are we responsible for third parties' websites and social media links?

This Policy applies solely to Personal Information collected with regard to the provision of the Services, the operation of the website and otherwise in connection with the operation of the Business. We are not responsible for the collection of information and/or privacy practices of our suppliers (such as recruitment agencies or market researchers), websites that may be linked to from the website from time-to-time, or social media platforms (e.g. LinkedIn, Twitter or Vimeo) which may be accessed via links on the website or on our emails. We refer you to the privacy policies and terms of use of those relevant suppliers and service providers.

8. Do you need to know more about direct marketing?

- (a) your Personal Information may be used to offer you new products and services, notify you of new developments to our existing Services, or any other promotional communication related to the Services.
- (b) If you do not wish to receive direct marketing communications from us, you may opt-out any time by clicking a link on the email communications sent to you or contacting us as set out in section 12.

9. Do you need to know more about cookies and analytics?

- (a) We may use "cookies" technology to store data on your computer using the functionality of your browser. Many websites do this because cookies allow the website publisher to do useful things like find out whether the computer has visited the site before. You can modify your browser to prevent cookie use but if you do this, the website may not work properly. The information stored in the cookie is used to identify you. This enables us to operate an efficient service and to track the patterns of behaviour of visitors to the website.
- (b) In the course of serving advertisements to the website (if any), third-party advertisers or ad servers may place or recognise a unique cookie on your browser. The use of cookies by such third-party advertisers or ad servers is not subject to this Policy, but is subject to their own respective privacy policies.

10. How do we keep Personal Information secure?

- (a) you should be aware that there are inherent risks associated with the transmission of information via the Internet. Data security measures can never be guaranteed. This means that while we take steps to protect your Personal Information, we cannot guarantee its security.
- (b) If you suspect any misuse or loss or unauthorised access, modification or disclosure of your Personal Information, please contact us immediately.

11. Will we transfer your Personal Information?

If there is a sale, merger, consolidation, change in control, transfer of substantial assets, reorganisation or liquidation of us then, in our sole discretion, we may transfer, sell or assign your Personal Information collected to one or more relevant third parties.

12. What if you have questions or complaints?

- (a) If you:
- (i) have any questions about this Policy;
 - (ii) wish to request access to any Personal Information;
 - (iii) wish to be de-identified, or have your personal information deleted;
 - (iv) wish to correct or update your Personal Information; or
 - (v) wish to make a complaint or discuss any other privacy concerns you may have,
- please contact us at:
- The Privacy Officer
- by email: hello@pushcollective.com
- by post: 51 Victoria Street, Fitzroy 3065 Victoria Australia
- (b) If you believe we have breached our obligations under this Policy or the Australian Privacy Principles, please give us the opportunity to resolve matters by contact us first, in writing by email or by post. Once we have received a complaint, we will try to work with you to resolve the matter. The steps we may take to resolve the matter include:
- (i) we may request further information from you. This will enable us to investigate the complaint and determine an appropriate solution.
 - (ii) we will discuss options for resolution with you. If you have suggestions about this this matter, please raise these with our Privacy Officer.
 - (iii) where necessary, we will conduct an investigation and endeavour to do so within a reasonable time. we may have to conduct others in order to progress the investigation.
- (c) If you are not satisfied with our response to your complaint, you may wish to contact the Office of Australian Information Commissioner (**OAIC**). For more information, please see their website <https://www.oaic.gov.au/about-us/contact-us>. Please note that the OAIC may decline to investigate until you have first raised the matter with us.