

VisionHQ Privacy Policy

Updated February 2025

1. OVERVIEW

- 1.1 VisionHQ Pty Ltd A.C.N. 642 805 427 (“we”, “us” or “our”) is committed to protecting your privacy as a visitor to our website. This Privacy Policy provides details of how we collect, use, store and protect your Personal Information through your use of our website: <https://www.visionhq.au> (“website”).
- 1.2 We use your data to provide and improve our products and the provision of our Services. By using the Services, you agree to the collection and use of your information in accordance with this Privacy Policy.
- 1.3 We comply with the applicable privacy principles and laws of Australia which regulate how we collect, use, and protect your personal information.
- 1.4 This Privacy Policy and our website Terms and Conditions and/or any subsequent agreement in respect of the Services with VisionHQ form the entire agreement between you and VisionHQ. This Privacy Policy may change from time to time and is available on our website.

2. CONTACT DETAIL

- a. Name: VisionHQ Pty Ltd ACN 642 805 427
- b. Email: support@VisionHQ.au
- c. Contact Number: (07) 4276 6666
- d. Postal Address: PO Box 2166, Runcorn, QLD 4113

3. DEFINITIONS

In this Privacy Policy:

Australian Privacy Principles (APP) means the Australian Privacy Principles contained in Schedule 1 of the *Privacy Act 1988* (Cth). These APPs govern the content of privacy policies and rights under Australian law.

Cookies are small files stored on your device (i.e., computer or mobile device). These small files are pieces of information stored on your computer's hard drive. It records how you move your way around a website so that, when you revisit that website, it can present tailored options based on the information stored about your last visit. Cookies can also be used to analyse traffic and for advertising and marketing purposes.

Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any Personal Information is, or is to be, processed. For the purpose of this Privacy Policy, we are a Controller of your Personal Information.

Jurisdiction means Australia.

Personal Information means data or information about a natural person who can be identified, directly or indirectly, from such information or data in our possession or likely to come into our possession.

This includes a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person but does not include data that is anonymous or a pseudonym in its source.

Purposes means those purposes for the collection and holding of information in accordance with Clause 4.1.

Relevant Authority means the Office of the Australian Information Commissioner.

Relevant Laws means the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (APPs)

Service(s) means the use of the website and any provision of our products of services via other means, including but not limited to, physical means.

4. OUR COLLECTION AND DISCLOSURE OF YOUR PERSONAL INFORMATION

4.1 For the purposes of providing the Services, we may collect, hold, process and disclose your Personal Information for the following purposes:

- (a) to enable you access to our website;
- (b) to operate, protect, improve and optimise our website;
- (c) to provide you with information about our products and other services;
- (d) to carry out any contractual obligations between you and us or a third party;
- (e) to monitor and manage hosting and back-end infrastructure;
- (f) to allow for membership registration and authentication (e.g. affiliate portals and membership areas);
- (g) to carry out commercial affiliation;
- (h) to manage our user database;
- (i) to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- (j) to comply with our legal obligations;
- (k) to establish, pursue or defend legal claims, or resolve any disputes that we may have with any of our users, and enforce our agreements with third parties; and
- (l) to otherwise facilitate your dealings with us and for any other purpose with your consent.

4.2 We will only collect and hold your Personal Information for the Purposes or as otherwise reasonably necessary for the provision of the Services.

4.3 Your Personal Information will be collected and held by us. Any enquiries, complaints, comments or the exercise of any rights under the Relevant Laws should be directed to us via our contact details as provided in clause 2 above.

4.4 While using our Services we may ask you to provide us with certain Personal Information that can be used to contact or identify you, including but not limited to your:

- (a) first and last name;
- (b) date of birth;
- (c) email address;
- (d) mobile number;
- (e) location information;
- (f) IP address;
- (g) financial information, including bank details and credit and debit card information; and
- (h) postal address.

4.5 We may also obtain your Personal Information through email, text messaging, social media or any other communication that you send to us.

4.6 You acknowledge that the Personal Information you provide us must be accurate, complete and not misleading. You must inform us of any change to your Personal Information during the period in which you are accessing the Services.

4.7 We may, and by providing us your Personal Information you authorise us to, disclose Personal Information for the Purposes, including to:

- (a) our employees and related bodies corporate;
- (b) third party suppliers and service providers (including providers for the operation of our websites and/or our business or in connection with providing our products and services to you);
- (c) professional advisers, dealers and agents;
- (d) payment systems operators (e.g. merchants receiving card payments);
- (e) our existing or potential agents, business partners or partners;
- (f) our sponsors or promoters of any competition that we conduct via our Services;
- (g) anyone to whom our assets or businesses (or any part of them) are transferred;
- (h) specific third parties authorised by you to receive information held by us; and/or
- (i) other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

4.8 You specifically authorise us to disclose information to persons or entities outside the Jurisdiction while providing the Services where such disclosure is in furtherance of the Purposes and is reasonably necessary. Where information is provided outside the Jurisdiction, we will take reasonable steps to ensure that your Personal Information is:

- (a) only disclosed in accordance with the Relevant Laws; and
- (b) provided comparable safeguards to those offered under the Jurisdiction,

however, any entity outside the Jurisdiction to which your Personal Information is disclosed will not be accountable under the Relevant Laws of the Jurisdiction and you may not be

able to seek redress under the Relevant Laws of the Jurisdiction or under the laws of the jurisdiction where your Personal Information was disclosed.

4.9 Where we are required to collect Personal Information by law or under the terms of a contract with us, and you do not provide us with that information as and when requested, we may not be able to perform that contract (for example, to deliver goods or services to you) and in such cases we reserve the right to cancel a product or service you have ordered.

4.10 By providing us with your Personal Information, you warrant that you are over the age of 18 years.

5. YOUR RIGHTS REGARDING YOUR PERSONAL INFORMATION

5.1 You have particular data protection rights under the Relevant Laws, including:

- (a) to receive privacy information (i.e. this Privacy Policy) at the time we collect Personal Information from you (**Right to be Informed**);
- (b) to lodge a complaint with the Relevant Authority (**Right to Complain**);
- (c) to access, update or delete any Personal Information we hold regarding you (**Right of Access**);
- (d) to request a copy of the Personal Information we hold about you, to be provided in a structured, machine-readable and commonly used format. (**Right to Data Portability**);
- (e) to request rectification of Personal Information we hold that is incorrect or incomplete (**Right of Rectification**);
- (f) to object to our processing of your Personal Information on the basis that the processing is unlawful, including because:
 - (i) it is not necessary for the purposes of our legitimate interests;
 - (ii) it offends your interests or fundamental rights and freedoms in respect of the protection of personal data.
 - i. (**Right to Object**)
- (g) to request we restrict the processing of your data where you:
 - (i) contest the accuracy of the Personal Information; or
 - (ii) you believe our processing is unlawful but you oppose the erasure of your Personal Information.
 - i. (**Right of Restriction**)
- (h) to withdraw your consent for us to process your Personal Information (**Right to Withdraw Consent**).

5.2 We may ask you to verify your identity before responding to any exercise of a right.

5.3 You may be able to exercise your Right of Access through your account on the website, including by changing the settings we have provided in your account settings. For any other Right of Access matters, please contact us by one of the methods identified in clause 2. We will endeavour to provide you with access in accordance with the method you request; however, we reserve the right to provide access in a way that is not unduly onerous to us.

- 5.4** When exercising your Right of Access, we may not be able to provide you with access to all your Personal Information; where this is the case, we will tell you why within the timeframe required by the Relevant Laws. We may also need to verify your identity when you request your Personal Information.
- 5.5** While your Right to Object is pending, we will restrict the processing of your Personal Information until such time that the objection is no longer under consideration, at which time we will inform you of the outcome, including whether the restriction on processing is lifted.
- 5.6** If your Right to Object is upheld, we will destroy your Personal Information. If you wish to object but do not wish us to destroy the Personal Information, you should exercise your Right of Restriction.
- 5.7** Exercising your Right to Object, Right of Restriction or Right to Withdraw Consent may impact on our ability to provide you with the Services, including preventing us from providing you with the Services at all.
- 5.8** Should your Personal Information no longer be necessary for the Purposes, then we will destroy your Personal Information without undue delay. We ordinarily store Personal Information for a period of seven (7) years to effect the Purposes. However, we will destroy your Personal Information at an earlier time if:
- (a) You request that we destroy your Personal Information; or
 - (b) You opt out of our marketing and promotional materials,
- except to the extent we are required to keep any of the Personal Information by law or for the Purposes.
- 5.9** We will notify you if your personal data is rectified or erased unless notification would involve disproportionate effect to the rectification or erasure.

6. MARKETING

- 6.1** We may send you direct marketing communications and information about our Services or products. This may take the form of emails, SMS, mail or other forms of communication. You may opt-out of receiving marketing materials from us by contacting us using the details set out below or by following the opt-out links on any marketing messages sent to you or by emailing us with a request to opt-out.
- 6.2** If you opt out of receiving marketing communications, this opt-out does not apply to personal information provided as a result of other transactions, including, but not limited to purchases or the provision of other services.

7. OUR WEBSITE AND COOKIES

- 7.1** We may collect Personal Information about you when you use and access our website, including via the use of Cookies or other similar tracking technologies.
- 7.2** While we do not ordinarily use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit and the internet protocol address assigned to your computer.
- 7.3** We may use Cookies to enable us to collect data that specifically includes Personal Information when you create an account on our website. For example, where a Cookie is linked to your account, it will be considered Personal Information under the Privacy Act. We will handle any Personal Information collected by Cookies in the same way that we handle all other Personal Information as described in this Privacy Policy.

7.4 We will ask you what Cookies you wish to accept when you first visit our website. If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings. By not blocking Cookies and continuing to browse, you are authorising the use of Cookies. If you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of our website or may encounter reduced website functionality.

8. SECURITY

8.1 We may hold your Personal Information in either electronic or hard copy form.

8.2 We take reasonable steps to protect your Personal Information from misuse, interference and loss, as well as unauthorised access, modification or disclosure and have procedures in place to protect your Personal Information and deal with any suspected data breach. For example, we:

- (a) store Personal Information in an encrypted format; and
- (b) delete Personal Information when no longer required for the Purposes or required to be held by law;

8.3 While we take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information, you acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

8.4 Should there be a breach of security which results in the disclosure of your Personal Information, we will either:

- (a) Notify you personally; or
- (b) If not reasonably practicable to notify you personally, issue a public notice regarding the nature and extent of the data breach.

8.5 Our website may contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated otherwise, we are not responsible for, nor provide any warranty as to the security, privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, and we encourage individuals to read them before using those websites.

9. COMPLAINTS

9.1 If you think we have breached the Privacy Act, or you wish to make a complaint about the way we have handled your personal information please contact us.

9.2 We will acknowledge your complaint and respond to you regarding your complaint within a reasonable period of time. If you think that we have failed to resolve the complaint satisfactorily, we will provide you with information about the further steps you can take.