

**firstmove**  
**Digital**



# PRIVACY POLICY

## PRIVACY POLICY

We, the “Company” – is engaged by the Client to provide the Services.

You, the “Client” – engages the Company to provide the Services.

1. This Privacy Policy sets out the rules we will abide by when dealing with personal information we collect from individuals in the course of our business. This policy is consistent with the Australian Privacy Principles of the Privacy Act 1988.
2. We may make alterations or additions to this policy from time to time. Should we do so, we will update the Privacy policy on our web site. We require that all our customers agree to abide by our Privacy policy as part of our terms of trade. This policy also applies to users of our web site who are not customers.
3. We do not assume any responsibility for the privacy or security practices of any other web sites which you may be able to access through our site, or for our customers’ level of compliance with our code.
4. We collect different information about you at different times such as;
  - a. Information we require to provide our services.  
When you first sign up or contact us for our services, or when you make an inquiry about our services, we collect information such as your name, address, telephone number, domain name, email address of your primary and secondary contacts, credit card details.
  - b. Non-personally identifying information.  
We operate statistical gathering software on its web site to collect information about the number of visitors coming to the site. No identifying information is collected by this software, which records the IP address of the visitor only. Information is collected to enable analysis to support further development of our website user experience. This may include the server address, top level domain name (.com, .gov etc), date and time of visit, pages accessed, documents downloaded, referring site, and the type of browser. We will not record any identifying details (such as name and IP) of the individual user, or their other browsing activities. The only exception to this rule is if we are directed to do so under a law enforcement agency, which allows them to inspect our web server’s logs.
  - c. Other demographic information.  
We may use your information to measure your experiences of our products/services/website, improve or develop our products/services/website, and perform research/analysis. Also, if you respond voluntarily to any of our surveys or other interactive communications, we will collect those responses and use the information to improve the quality and range of our products and services.
5. We collect and use your personal information to best operate and improve the delivery of our services to you. We will use your personal information to provide you with: sales and technical support, billing and credit control, product upgrades and information, renewal notices, maintenance notices, system changes and other functions relevant to your services with us.
6. When you contract us for our services, or make enquires of our services, you will be requested to provide your consent to us to send promotional material to you. You may stop the delivery or “opt-out” of future promotional email by following the specific instructions in the email you receive.
7. We may use your personal information to:
  - a. contact you in relation to upgrading your use of our services, special offers (from us, or on behalf of third parties), with newsletters, surveys, and individual service audits, or in response to any expression of interest we may receive from you in relation to our products and services;
  - b. identify the source of new customers;
  - c. monitor and address complaints, other feedback, and to resolve disputes;
  - d. in the case of credit cards, to bill you for services;
  - e. in the case of ABNs, to verify your identity;
  - f. maintain a technical and account history of your dealings with us, and to re-establish your account with us where you re-join as a customer within a reasonable time after having terminated your account;

**LEGALS - General**

- g. monitor your compliance with our terms and conditions;
- 8. We will treat all information we collect from you as strictly confidential. We do not rent or lease its customer lists to third parties. We will not reveal, disclose, sell, distribute, rent, licence, share or pass onto any third party (other than those who are contracted or supply services to us including of spam filter operators) any personal information that you may have provided to us unless we have your express consent to do so, other than in the following circumstances:
  - a. if we are required to do so by law or in the good faith belief that such action is necessary to conform with the laws, applicable code of conduct or legal process served on us in relation to our business;
  - b. to protect and defend our rights or property;
  - c. if we consider it necessary to do so in order to enforce or apply the terms of any of our agreements with you;
  - d. to contractors providing licensed collections services, credit card payment processing and CRM services, who comply with our privacy and security policies;
  - e. if we sell our business or part of it; and
  - f. in extreme circumstances, to protect the personal safety of users of our services, website, our staff or the public.
- 9. We may supply your personal information to third parties to perform services on our behalf such as:
  - a. market research and the distribution of marketing information to you (except where you have chosen to opt out of receiving this information from us);
  - b. assisting us with the purposes for which we have collected and use your personal information;
  - c. the supply of Website design, SEO, Pay Per Click and other services
  - d. Our relationships with such third party service providers are governed by our contracts with them. In some cases, these third party service providers who we disclose your personal information to may reside outside of Australia. Those service contracts contain privacy and confidentiality provisions which are consistent with the Australian Privacy Law obligations.
- 10. We maintain our data in a controlled, secured environment. Constant changes to the Internet and technology mean that we cannot guarantee that data transmission will be 100% secure, or safe from attack by unauthorised intruders.
- 11. You might provide personal information through your participation in chat sessions, email exchanges or newsgroups accessed via our web sites, or another service provided by us. This information is public and immediately available to anyone who has access to such a site; it is not private. We urge you to enter only information that you are comfortable to share with the public at large in this public domain.
- 12. If you collect personal information which you keep on services provided, you alone are responsible for compliance with the Privacy Act 1988 (Cth) in respect of that information. We take no responsibility for your dealings with personal information you collect.
- 13. If you have a complaint about any aspect of our Privacy procedures, please contact us. If we cannot resolve the complaint to your satisfaction within a reasonable time, you or we may refer the complaint to the Privacy Commissioner.