

Privacy & Cookies Policy

1 July 2018

CompareBear Australia respects your privacy and shares your concern about the security of data you may submit to our websites and the *related mobile applications* and services (collectively, the "Services"). Our privacy policy (the "Privacy Policy"), which forms part of our Terms of Use, explains the information we collect, how we use and protect it, how to access and update your information, and how to manage your privacy settings when using the Services.

Introduction and General Terms

In this Policy, the following terms shall have the following meanings:

"Account"	means an account required to access and/or use certain areas and features of Our Site;
"Cookie"	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in Web browser cookies section below;
"personal data"	information or an opinion about an identified individual, or an individual who is reasonably identifiable. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation ("GDPR")
"We/Us/Our"	means CompareBear Australia

Who are we?

CompareBear Australia Pty Ltd (ABN 74626315151) trading as CompareBear Australia ("CompareBear") is an information service that provides you with the tools and information you need to compare a wide range of products, providers and services. We take your privacy seriously. We have published this policy to show we manage the personal information you provide to us when using our services.

What does this Privacy and Cookie Policy cover?

This Privacy Policy applies to your access and use of the CompareBear

Australia site www.comparebear.com.au and CompareBear products and services (together, the "CompareBear Australia Services" or "Site" or "Services").

This Privacy Policy, which forms part of our Terms of Use, describes the information that we gather from you, our use and disclose your information, and the steps we take to protect your information. By using our Services, you consent to the privacy practices described in this policy.

In order to provide you with information, tools and other services we may collect and retain "Personal Information" that may identify you or contribute to identifying you. "Personal Information" can include information such as your name, email address, your photo, contact details and, in some cases, general financial information. We will not collect your personal information unless it's necessary to provide the information, advice or service you've requested and, where possible, you'll be able to use our services anonymously.

We will generally only collect your personal information from you or from someone you've authorised to provide it to us. We will also only collect information by lawful and fair means and not in an unreasonably intrusive way. CompareBear Australia website contains hyperlinks to websites owned and operated by third parties. These third party websites have their own privacy policies and are also likely to use cookies, and we, therefore, urge you to review them. They will govern the use of personal information you submit when visiting these websites, which may also be collected by cookies. We do not accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

EU members' rights

If you are located in the European Union, as a data subject you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:

1. The right to be informed about Our collection and use of personal data;
2. The right of access to the personal data We hold about you;
3. The right to rectification if any personal data We hold about you is inaccurate or incomplete;
4. The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you;
5. The right to restrict (i.e. prevent) the processing of your personal data;
6. The right to data portability (obtaining your personal data to re-use with another service or organisation);
7. The right to object to Us using your personal data for particular purposes; and
8. Rights with respect to automated decision making and profiling.

When does CompareBear collect information about me?

When you use our service (or while you're accessing our services) we may collect personal information about you. Because we take your privacy seriously we will take reasonable steps to ensure that you are aware of:

- who we are and how you can contact us; and
- how you can gain access to the information we have collected about you;

and

- the purposes for which the personal information is collected; and
- the organisations (or the types of organisations) to which we may disclose your personal information; and
- the laws that require us to collect this information; and
- the main consequences (if any) for you if you choose not to provide us with personal information about you.

We provide general comparative information about a range of products and can help you connect with businesses that provide relevant products and services. We prefer to collect personal information about an individual only from that individual but when you use our services you may provide us with personal information about someone else. We won't ask you for personal information about someone else unless it's needed to provide you with the service, advice or information you've requested but if you provide us with information about another person, you need to ensure that you are authorised to disclose that information to us. It's your responsibility to ensure that they understand how we will collect, use or disclose the information you provide. You need to take reasonable steps to ensure that they understand that we will not take any additional steps to confirm their understanding of these issues.

What information will CompareBear collect about me?

We collect different types of information from or through the Service. The legal bases for www.comparebear.com.au processing of personal data are primarily that the processing is necessary for providing the Service in accordance with our Terms of Service and that the processing is carried out in CompareBear Australia's legitimate interests, which are further explained in the section "How will CompareBear Australia use personal information about me?" of this Policy. We may also process data upon your consent, asking for it as appropriate.

- *User-provided Information.* When you use the Service, as a User or as a Visitor, you may provide, and we may collect Personal Data. Examples of Personal Data include name, email address, mailing address, mobile phone number. Personal Data also includes other information, such as geographic area or preferences, when any such information is linked to information that identifies a specific individual. You may provide us with Personal Data in various ways on the Service. For example, when you register for a service with us, use the Service, post Client Data, interact with the Service through communication or messaging capabilities, or send us customer service -related requests.
- *Automatically Collected Information.* When a User or Visitor uses the Service, we may automatically record certain information from the User's or Visitor's device by using various types of technology, including cookies, pixels or web beacons. This "automatically collected" information may include IP address or other device address or ID, web browser and/or device type, the web pages or sites visited just before or just after using the Service, the pages or other content the User or Visitor views or interacts with on the Service, and the dates and times of the visit, access, or use of the Service. We also may use these technologies to collect

information regarding a Visitor or User's interaction with email messages, such as whether the Visitor or User opens, clicks on, or forwards a message. We may also use these technologies to collect data on how successful our advertising is and performance of our advertising partners (conversion data). This information is gathered from all Users and Visitors.

- *Integrated Services.* You may be given the option to access or register for the Service through the use of your user name and passwords for certain services provided by third parties (each, an "Integrated Service"), such as through the use of your Facebook account, or otherwise have the option to authorise an Integrated Service to provide Personal Data or other information to us. By authorising us to connect with an Integrated Service, you authorise us to access and store your name, email address(es), date of birth, gender, current city, profile picture URL, and other information that the Integrated Service makes available to us, and to use and disclose it in accordance with this Policy. You should check your privacy settings on each Integrated Service to understand what information that Integrated Service makes available to us, and make changes as appropriate. Please review each Integrated Service's terms of use and privacy policies carefully before using their services and connecting to our Service.
- *Information from Other Sources.* We may obtain information, including Personal Data, from third parties and sources other than the Service, such as our partners, advertisers, credit rating agencies, and Integrated Services. If we combine or associate information from other sources with Personal Data that we collect through the Service, we will treat the combined information as Personal Data in accordance with this Policy.

How will CompareBear use personal information about me?

All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the applicable legal requirements at all times. For more details on security see section "Will CompareBear Australia share my personal information with anyone else?" below.

Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:

- answering your general queries about products and related matters;
- confirming your identity;
- communicating with you;
- administering our services;
- notifying you of the services we offer;
- carrying out marketing, training or promotional activities;
- responding to feedback, comments, or any other contact;
- sending you email(s) or newsletters to which you have subscribed;
- carrying out competitions;

- enhancing our Site or Services;
- helping you to resolve technical issues with our site;
- helping you to identify products and product providers appropriate for your needs and circumstances;
- referring you to product providers;
- in connection with a corporate transaction, such as a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy; or
- in marketing, to provide educative, relevant and promotional material (and then only with your express permission);
- where we provide personalised services, we may analyse the information you supply, as well as your activity on our (and other) services, so that we can offer a more relevant, tailored experience;
- providing and managing your account.

By using our services, you consent to us collecting, holding and using your personal information in this way.

We may also access, hold and use aggregated information about the people that use our services. Aggregated information won't identify you or any other individual but simply provides us with non-personally identifiable data that we'll use to improve our services, understand our users' needs and develop tailored content. Although you would have provided us with the information we aggregate for these purposes, it won't identify you or enable you to be personally identified.

How long will CompareBear keep my data?

We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with the CompareBear Australia.

Will I be contacted for marketing purposes?

With your permission and/or where permitted by law, CompareBear Australia may also use your data for marketing purposes which may include contacting you by email or text message or post with information, news and offers on Our services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the applicable legal requirements.

We may use information which we hold about you to show you relevant advertising on third-party sites (e.g. Facebook, Google). This could involve showing you an advertising message where we know you have a CompareBear Australia and have used CompareBear Australia services. If you don't want to be shown targeted advertising messages from CompareBear Australia, some third party sites allow you to request not to see messages from specific advertisers on that site in future.

Will CompareBear share my personal information with anyone else?

As a general principle, we won't disclose your personal information without your express permission unless:

- we are required to do so by the law, to comply with our obligations or exercise our rights;

- it's necessary to lessen or prevent a serious and imminent threat to a person's health, life or safety;
- it's required to facilitate a corporate transaction, such as a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy; or
- it's necessary to lessen or prevent a threat to public health or public safety.

Generally, we will use your information within CompareBear Australia and will only share it outside CompareBear Australia where you have requested it or given your consent. However, we may share with the following entities:

- *Third-party vendors* who provide services or functions on our behalf, including business analytics, customer service, marketing, distribution of surveys, and fraud prevention. We may also authorise third-party partners to gather information on our behalf, including as necessary to operate features of our website. Third-party vendors have access to and may collect information only as needed to perform their functions and are not permitted to share or use the information for any other purpose.
- *Companies within our corporate family.* We may share your personal information with our corporate affiliates, including Glimp NZ and CompareBear NZ. This sharing enables us to provide you with information about products and services, which might interest you. To the extent that our corporate affiliates have access to your information, they will follow practices that are at least as restrictive as the practices described in this Privacy Policy.
- *Advertising partners.* We share personal data with advertising partners, including your email address, as part of marketing of our services via third parties (to ensure that relevant advertisements are shown to the right audience). We strive to only share email addresses in hashed form to enable the matching of your email address with an existing customer database so that your email address cannot be used for other purposes.

Protecting the privacy of children

We do not allow children under 15 years of age to become registered users nor will we knowingly collect or maintain information from them. If you identify or suspect that we have acted contrary to this policy, please alert us at hello@comparebear.com.au and ask for that information to either be deleted or secured.

How we maintain accurate information

Although we will take reasonable steps to make sure that the personal information we collect, use or disclose is accurate, complete and up-to-date, it is your responsibility to ensure that the information you provide to us is accurate, complete and current. You control the information you provide to us and you can correct or update any information you choose to provide to us. If you want us to correct our records simply tell us what needs to be changed and why.

How and where does CompareBear keep my data?

To offer our services, we may need to transfer your personal information

among several locations, including Australia, where we are headquartered. Some of our product and service providers will process your data in other countries, however, we require all our partners to ensure that your data is kept securely at all times. If you choose to access the Site from the European Economic Area ("EEA") or Switzerland, please understand that you will be transferring your information to the location other than in which the information was originally collected.

The information we collect is entered into our site by you, imported on your instruction and transmitted across the internet to our servers. By using our service, you are consenting to this process. The service providers who host our servers are not permitted to access your personal information except for the purposes of storing it. Although we will take reasonable steps to protect the information you provide to us, you should appreciate that the Internet itself is not secure and take care about the personal information that you transfer over the internet or by email.

In a limited number of circumstances, we may use third-party providers to facilitate surveys or mail outs on our behalf. Should this occur, we will only do so where the Service Provider:

- has committed to securing your personal information in a manner consistent with our policy; or
- neither holds, accesses, uses or retains the personal information other than as we have engaged them.

Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site. We use industry-standard Secure Sockets Layer (SSL) technology to allow for the encryption of personal information and credit score data. CompareBear Australia engages a company that is an industry leader in online security and verification to strengthen the security of our services. CompareBear Australia is registered with site identification authorities so that your browser can confirm CompareBear Australia's identity before any personally identifiable information is sent. In addition, our secure servers protect this information using advanced firewall technology.

How can I control information about me?

When you submit personal data via CompareBear Australia, you may be given options to restrict Our use of your data. In particular, we aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details and by managing your Account).

The right to withhold information

You may access some areas of the site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

Can I find out what personal information CompareBear keeps about me?

This document sets out our approach to the management of personal

information and we make this available to anyone who asks for it. If you need to know more, we are more than happy to explain to you what sort of personal information we hold, for what purposes, and how we collect, use and disclose that information.

If you need additional information about the Australian Privacy Principles, the Privacy Law or our obligations you can also access the website of The Office of the Australian Information Commissioner (<http://www.oaic.gov.au/>).

You have the right to request access to the personal information CompareBear Australia holds about you (where such data is held) and to have any inaccuracies corrected. We will not restrict your access to the information unless:

- providing access would pose a serious threat to someone's life or health; or
- providing access would have an unreasonable impact upon someone else's privacy; or
- the request for access is frivolous or vexatious; or
- the information relates to existing or anticipated legal proceedings between you and us;
- providing access would prejudice our negotiations; or
- providing access would be unlawful; or
- denying access is required or authorized by or under law; or
- providing access would be prejudicial or commercially sensitive.

If we can't provide you with access to the information because of one or more of these reasons (which we will confirm in writing) we will consider reasonable alternatives that may satisfy all parties. You'll generally be able to access your personal information without cost but, if we think a charge is reasonable it will not be excessive and will not apply to lodging a request for access.

We will use reasonable efforts consistent with our legal duty to supply, correct or delete personal information about you on our files. If you are within the European Economic Area ("the EEA"), where the EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein, please address requests and questions about this or any other question about this Privacy and Cookies Policy hello@comparebear.com.au

We will need two copies of forms of identification, which can be:

- Passport
- Driving licence
- Birth certificate
- Utility bill (from last 3 months)
- Current vehicle registration document
- Bank statement (from last 3 months)
- Rent book (from last 3 months).

Where my personal information may end up?

Unless you choose to provide your personal information or instruct us to do so, the personal information we hold will be secured on our servers and not be transferred elsewhere. There are some exceptions, but we won't transfer personal information to a foreign country unless:

- We believe that the recipient of the information is subject to a law or arrangements that are substantially similar to our commitment; or
- you consent to the transfer; or
- the transfer is necessary for the performance of a contract between you and us, or for the implementation of pre-contractual measures taken in response to your request; or
- the transfer is necessary for the conclusion or performance of a contract concluded by you;

We will not transfer information contrary to this policy, without your consent or in a manner inconsistent with this policy.

Web browser cookies

What is a cookie?

A cookie is a small amount of data, often containing a unique identifier, sent to your computer or mobile device web browser from a website's server and is kept on your device's hard drive.

How does CompareBear use cookies?

We use different types of cookies for different things, such as:

- Analysing how you use CompareBear Australia
- Giving you a better, more personalised experience
- Recognising when you've signed in.

First party cookies

CompareBear Australia may place and access certain first-party Cookies on your computer or device. First party Cookies are those placed directly by CompareBear Australia and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our product and services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

Third party cookies

By using Our Site you may also receive certain third party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than Us. Third-party Cookies are used on CompareBear Australia for advertising services or social media. For more details, please refer to **How We Use Your Data?**.

Our Site uses analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling CompareBear Australia to better understand how Our Site is used. This, in turn, enables Us to improve Our Site and services offered through it. The analytics services used by Our Site use Cookies to gather the required information. You do not have to allow CompareBear Australia to use these Cookies, however, whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you. In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party Cookies. By default,

most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however, you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

Other information collected from web browsers

Your web browser may also provide the CompareBear Australia with information about your device, such as an IP address and details about the browser that you are using. We use information provided by your browser or by the link that you have clicked to understand the webpage that directed you to CompareBear Australia and this may be captured by performance cookies. If you have any concerns about the way that we use cookies or respect your settings, then please contact us at hello@comparebear.com.au

DNT (Do Not Track) browser setting

DNT is a feature offered by some browsers, which, when enabled, sends a signal to websites to request that your browsing is not tracked, such as by third-party ad providers, social networks and analytics companies. This website does not currently respond to DNT requests.

Contacting CompareBear about this Privacy and Cookies Policy

We believe in openness and we are committed to ensuring that we respect the privacy of those using the exceptional services we provide. If you want to arrange access to your information or have questions about privacy or the use of this site, please email hello@comparebear.com.au

Please note that if the responding officer determines with good reason that your message is spam within the meaning of the Spam Act 2003 (Cth), CompareBear Australia reserves the right not to respond to any message you send and to block your use of this website from the IP address where the spam originates and reserves the right to claim compensation under the appropriate legislation.

Changes to CompareBear's Privacy and Cookies Policy

This policy will be updated from time to time and becomes effective the moment it is posted on our site. The date of the most recent revision will appear on the page. Please revisit this page each time you submit personal information to CompareBear Australia to stay aware of any changes to this Privacy Policy. If you subsequently use our site or services, you are deemed to have accepted the amended policy. If you do not agree to these changes, please do not continue to use CompareBear Australia website to submit personal information to CompareBear Australia.

