

Privacy Policy

This Privacy Policy applies to all personal information collected by GROWTH ENGINE AUSTRALIA

1. What information do we collect?

- The kind of Personal Information that we collect from you will depend on how you use the website. The Personal Information which we collect and hold about you may include:
- email address, address, name, phone number, medical history, superfund details and payment details

2. Types of information

The Privacy Act 1998 (Cth) (Privacy Act) defines types of information, including Personal Information and Sensitive Information.

Personal Information means information or an opinion about an identified individual or an individual who is reasonably identifiable:

1. whether the information or opinion is true or not; and
2. whether the information or opinion is recorded in a material form or not.

If the information does not disclose your identity or enable your identity to be ascertained, it will in most cases not be classified as "Personal Information" and will not be subject to this privacy policy.

Sensitive Information is defined in the Privacy Act as including information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive Information will be used by us only:

- for the primary purpose for which it was obtained;
- for a secondary purpose that is directly related to the primary purpose; and
- with your consent or where required or authorised by law.
- in accordance with enhanced security measures appropriate to the sensitivity of the information.

3. How we collect your Personal Information

- We may collect Personal Information from you whenever you input such information into the Website, related app or provide it to Us in any other way.
- We may also collect cookies from your computer which enable us to tell when you use the Website and also to help customise your Website experience. As a general rule, however, it is not possible to identify you personally from our use of cookies.
- The cookies we use may include essential cookies for Website functionality, analytical cookies to improve our services, and preference cookies to remember your settings. You can manage your cookie preferences through your browser settings, though disabling certain cookies may limit Website functionality.
- We generally don't collect Sensitive Information, but when we do, we will comply with the preceding paragraph.

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4. Purpose of Collection

- We collect Personal Information to provide you with the best service experience possible on the Website and keep in touch with you about developments in our business.
- We customarily only disclose Personal Information to our service providers who assist us in operating the Website. Your Personal Information may also be exposed from time to time to maintenance and support personnel acting in the normal course of their duties.
- By using our Website, you consent to the receipt of direct marketing material. We will only use your Personal Information for this purpose if we have collected such information direct from you, and if it is material of a type which you would reasonably expect to receive from use. We do not use sensitive Personal Information in direct marketing activity. Our direct marketing material will include a simple means by which you can request not to receive further communications of this nature, such as an unsubscribe button link.
- Our direct marketing communications may include newsletters, product updates, and promotional offers sent at intervals not exceeding one time per month. You may modify your marketing preferences at any time through your account settings or by contacting our Privacy Officer. Any opt-out request will be processed within 14 business days, and you may choose to opt out of specific communication types while remaining subscribed to

5. Security, Access and Correction

We store your Personal Information in a way that reasonably protects it from unauthorised access, misuse, modification or disclosure. When we no longer require your Personal Information for the purpose for which we obtained it, we will take reasonable steps to destroy and anonymise or de-identify it. Most of the Personal Information that is stored in our client files and records will be kept for a maximum of 7 years to fulfill our record keeping obligations.

We maintain specific retention periods for different categories of Personal Information: financial records are kept for seven years as required by tax laws; customer service records for twelve months; marketing preferences for twelve months; and website usage data for twelve months. Our data deletion process involves secure erasure of electronic records and physical destruction of paper documents. We conduct regular audits to ensure data is not kept longer than necessary and apply industry standard encryption during the anonymisation process.

The Australian Privacy Principles:

- permit you to obtain access to the Personal Information we hold about you in certain circumstances (Australian Privacy Principle 12); and
- allow you to correct inaccurate Personal Information subject to certain exceptions (Australian Privacy Principle 13).

Where you would like to obtain such access, please contact us in writing on the contact details set out at the bottom of this privacy policy.

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6. Complaint procedure

If you have a complaint concerning the manner in which we maintain the privacy of your Personal Information, please contact us as on the contact details set out at the bottom of this policy. All complaints will be considered by Danielle Morris and we may seek further information from you to clarify your concerns. If we agree that your complaint is well founded, we will, in consultation with you, take appropriate steps to rectify the problem. If you remain dissatisfied with the outcome, you may refer the matter to the Office of the Australian Information Commissioner.

7. Overseas transfer

Your Personal Information will not be disclosed to recipients outside Australia unless you expressly request us to do so. If you request us to transfer your Personal Information to an overseas recipient, the overseas recipient will not be required to comply with the Australian Privacy Principles and we will not be liable for any mishandling of your information in such circumstances.

In cases where overseas transfer is necessary, we will: (a) ensure recipients are located in countries with adequate privacy laws; (b) implement appropriate data security measures including encryption and access controls; (c) obtain specific consent for transfers to countries without equivalent privacy protections; and (d) provide you with details of recipient countries upon request. You retain the right to withdraw consent for overseas transfers at any time.

8. How to contact us about privacy

If you have any queries, or if you seek access to your Personal Information, or if you have a complaint about our privacy practices, you can contact us through: support@claimsaustralia.com.au.

9. Office of the Australian Information Commissioner (OAIC)

Primary body for privacy breaches under the Privacy Act 1988.

- Handles breaches involving personal information by:
 - Australian Government agencies
 - Private sector organisations with an annual turnover over \$3 million
 - Health service providers, credit reporting bodies, etc.

Website: oaic.gov.au

Complaint form: <https://www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacy-complaint-with-us/>