

PRIVACY POLICY FOR MANAGEMENT OF PERSONAL INFORMATION

CLUB-UP PTY LTD ABN 662 679 709 (referred to as “Club-Up”, “we”, “us”) is committed to protecting your privacy.

This Privacy Policy tells you about how we collect and use your personal information when you use our website at clubup.com.au mobile application or other services (“Services”).

The collection, use and disclosure of your personal information is governed by the *Privacy Act 1988* (Cth) if you are in Australia, the EU or UK General Data Protection Regulation (**GDPR**) if you are in Europe or the UK, or similar legislation applicable to where you live. For data protection purposes we are the controller and, unless otherwise noted, also the processor of data.

Consent

By visiting and/or using our Services you consent to our use and disclosure of your personal information in accordance with what is set out below.

You can withdraw your consent at any time by contacting us (see contact us section below).

The type of personal information we may collect

This Privacy Policy covers personal information that you give to us or that we collect automatically when you use our Services. Personal information is information that can be used to identify you. Personal information might include, your name, username and password, mailing address, email address, phone numbers, and financial information such as your credit card number and billing address.

Our Services are designed to assist users to connect with either potential employers or employees and are designed to work across multiple devices. To make this possible we store, process and transmit your personal information. This also makes it easier for you to connect with other users of our Services.

Personal information that you give to us

We only collect personal information that is needed to provide, protect and improve our Services. You may give us your personal information directly such as when you deal with us in person, online, by email, post or over the phone. Personal information will be collected when you first register to have dealings with us and is collected so that you can more easily do business with us.

You can choose not to provide personal information, but if you do this, we may not be able to provide the Services to you. In some circumstances, you may request to be anonymous or use a pseudonym, however, it may then be impracticable for us to deal with you or we may be required or authorised by law to identify you.

We try to collect personal information directly from the relevant person. However, if this is not practicable, we may collect personal information from third parties or publicly available information. If you give us personal information about another person, you must ensure you have the right to disclose that personal information to us.

Information automatically collected

When you use our Services, other kinds of information may also be collected automatically. This includes the website that referred you to us, your IP address, browser type and language, and access times. We may also collect navigational information, including information about the pages you view, the links you click, and other actions taken in connection with your use of the Services. We may combine your visit and navigational information with personal information that you provide.

We use "cookies" to enable you to sign in to our services and to help personalise your online experience. A cookie is a small text file that is placed on your hard drive. Cookies contain information, including personal information that can later be read by a web server in the domain that issued the cookie to you. The information that cookies collect includes the date and time of your visit, your registration information, and your navigational and purchase history. Cookies offer you many conveniences. They allow us to identify registered users when they return to the site so that they can retrieve previous image search results and view their previous invoices. Cookies also save you time by eliminating the need to repeatedly enter the same information.

In some cases, our third-party service providers may use cookies on our website or mobile application. We have no access to or control over these cookies. This Privacy Policy does not cover the use of cookies by third parties.

You have the ability to accept or decline cookies. Most browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies. If you choose to decline cookies, you may not be able to sign in or use other interactive features of our sites and services that depend on cookies.

In addition to cookies, we may use other technologies, including single-pixel gifs (also known as web beacons) on our websites and in promotional e-mail messages or newsletters. These tiny electronic images assist us in determining how many users have visited certain pages or opened messages or newsletters. We do not use these images to collect personal information.

Use of your personal information

We use the personal information you have given us for purposes which are consistent with the reason you provided the personal information, or for a directly related purpose. Such purposes for which we may use your personal information include:

- the provision of the Services to you which includes connecting you with another person who wants to employ you or whom you might want to employ;
- effectively communicating with you;
- operating and improving our Services;
- providing improved customer service;
- performing research and analysis aimed at improving our products and Services; and
- displaying content that is customised to your interests and preferences.

We may also use or disclose your personal information where you have consented to the use, either expressly or by implication.

Disclosure of your personal information

We do not sell, rent or trade your personal information to or with any third parties. We may disclose your personal information to external service providers in the circumstances discussed below.

You consent to us sharing your personal information with external service providers who perform services on our behalf. For example, we may hire other businesses to handle the processing of payments, provide data storage, host websites, fulfil orders and shipments, assist in direct marketing, conduct audits, etc. We only give those businesses the personal information they need to provide the service. We will take all reasonable steps to make sure they comply with the same privacy principles that govern our collection and use of your personal information.

We may disclose your personal information if required to do so by law, or in the good-faith belief that such action is reasonably necessary to comply with legal process, respond to claims, or protect the rights, property or safety of our company, employees, customers, or the public.

Where your information may be stored

Some of our external service providers, including those who provide data storage facilities, may be outside Australia. While we will do our best to make sure that overseas service providers to whom we give your personal information will comply with the same privacy principles as us we cannot guarantee it. By giving us your personal information, you consent to the disclosure of personal information to overseas service providers who may not comply.

If the EU or UK GDPR applies: We and some of our external service providers may not be in the country where you submitted your personal information. As a result, your personal information may be transferred to countries that have different levels of data protection laws to where you are. Where local data regulations require it, we have (a) put in place security measures for the export of personal information from its country of origin; and (b) made arrangements with those receiving your personal information, that they will put security measures in place and that your personal information is processed in accordance with EU and UK data protection laws.

Security of your personal information

We follow accepted industry standards to help protect your personal information. For instance, when you enter sensitive information (such as a credit card number) on our registration or order forms, we encrypt that information using secure socket layer (**SSL**) technology. No method of transmission over the internet, or method of electronic storage, is 100% secure. Therefore, while we strive to protect your personal information, we cannot guarantee its absolute security and any transmission of personal information is at your own risk.

Marketing and analytic services

We may send you surveys or marketing communications to inform you of new products or services or other information that may be of interest. Third parties with whom we have shared your personal information may send you direct marketing communications.

If you do not want to receive direct marketing communications from either us or a third party, it is easy to opt out. You can send us an email request at info@clubup.com.au or press the "unsubscribe" button on the communication that is sent to you. Please keep in mind that, if you choose not to receive marketing communications, you will continue to receive transactional or account communications (e.g., confirmation emails and account balance statements). In the case of direct marketing communications from third parties, you may have to follow their directions on how to unsubscribe from their communications.

We may also use analytics services such as Google Analytics and other companies to collect information regarding visitor behaviour and visitor demographics on our website and services. For more information, please visit www.google.com/policies/privacy/partners/. You can manage Google's collection and processing of data by going to <http://tools.google.com/dlpage/gaoptout>.

How to manage your personal information

You have, subject to certain exceptions allowed for by law, the right to access your personal information. If you would like to get access to, review or correct any of your personal information, after you have registered, go to the "CLUB PROFILE" section of our

website or such other section to which you are directed and make the appropriate changes. You may also request changes by emailing us at info@clubup.com.au.

We can provide you with a copy of personal information held on our current records at no charge. However, if we need to access archived records, such as personal information backed up or stored offsite, then we may charge for the cost of providing such access.

If the EU or UK GDPR applies: you are (among other things) also entitled to:

- receive transparent information regarding the processing of your personal information;
- access your personal information, including the right to obtain free of charge a copy of the personal information undergoing processing in a commonly available electronic format;
- rectification of incorrect personal information and completion of incomplete personal information;
- erasure of your personal information, including the “right to be forgotten”;
- restrict the processing of your personal information;
- your personal information being portable and accessible upon request;
- object to the processing of your personal information; and
- if you have consented to the processing of your personal information, you have the right to withdraw that consent.

If you wish to exercise any of the above rights email us at info@clubup.com.au.

If your personal information has been disclosed to a third party, in accordance with this Privacy Policy, we will take reasonable steps to notify the third party of the updated information.

Forums & other interactive services

Use of our Services may include giving you the chance to access discussion forums or other interactive areas or services, including blogs, chat rooms, bulletin boards, message, online hosting or storage services, or other areas or services in which you or third parties create, post or store any content, messages, comments, materials or other items on the sites, for example our social media pages (**Interactive Areas**). If you use an Interactive Area, you should be aware that these areas are open to the public and any personal information you post or provide at registration may be viewable by others. We are not responsible for personal information you submit in connection with the Interactive Areas, nor is it responsible for how others might use that information, including sending you unsolicited messages. Interactive Area postings may be retained indefinitely. If at any time you would like to remove a posting, please email us at info@clubup.com.au. Keep in mind that removal of a posting from an Interactive Area does not mean that the posting will be deleted from our systems.

Links

We may link to websites, including those of our third-party content providers and social media sites. The Site may contain social media features such as Facebook “Like” buttons. These features may collect information about your device’s IP address, set cookies or link you to a social media website where you may post personal information. The websites of our third-party providers and social media sites may have different privacy policies and practices from those disclosed here. We assume no responsibility for the policies or practices of such sites and encourage you to become acquainted with them prior to use.

Complaints

If you have questions, complaints or concerns regarding this Privacy Policy, please contact us by writing to us at: Level 4, 29 Kiora Rd Miranda NSW 2228 or via info@clubup.com.au. We treat all complaints about a breach of the Australian Privacy Principles seriously.

We will investigate your complaint and respond to you within a reasonable time. If you are not satisfied with our response, you have the right, depending on the jurisdiction, to make a complaint to the applicable regulator. In Australia, the applicable regulator is the Office of the Australian Information Commissioner. In Europe, the applicable regulator will be the local regulator in your jurisdiction in Europe and in the UK, it is the Information Commission’s Office.

Changes to this Privacy Policy

We reserve the right to change the terms of this privacy policy at any time. If there are material changes we will post a notice of such changes here or on our home page and publish the effective date of the change. We encourage you to review this policy whenever you visit our site.

Contact information

You can contact us during normal business hours AEST at:

Email: info@clubup.com.au

Last updated: September 2023