Privacy Policy



We are Well Healthcare Communications ABN 12 054 091 506 (Well Communications, we, or us), and this document is our Privacy Policy.

Well Communications is not bound to strictly comply with the Australian Privacy Principles or the Privacy Act, but we think it is important to show you what info we collect, what we will and won't do with your personal info, as well as how we collect, store, and handle personal info.

You accept this Privacy Policy by:

- accessing our Sites (including our website <u>wellcommunications.com.au</u> and includes our mobile apps & presence on third-party applications as well as social media platforms),
- sending us information (such as an email or enquiry form message),
- buying services from us, and
- as set out in our Service Terms.

Once accepted, the terms in this Privacy Policy apply to your personal information that we hold or collect in the future. For questions or notices, please contact us: hello@wellcommunications.com.au | Policy last updated: 5 May 2021

Collecting & using your information

1. Collect

What kind of personal information do we collect?

When we collect personal info, we do so in line with this Privacy Policy. You don't have to give us your personal info, but if you don't, we might not be able to provide you our various services or you might not be able to access certain Site features. **Examples** We can't contact you if we don't have your contact details.

Depending on how we interact with you, we might collect some or all the following information:

- **Contact**: Name, age, email address, date of birth, address, phone number;
- Social: Gender, social media platform details and info you give us through them; images of you; your opinions;
- **Device:** Device type, IP address, browser type, operating system, location, device, and network information
- Actions: How you interact with our Site, browser session & geo-location data, browsing behaviour, details of enquiries you make about our services;
- **Financial**: Purchase history, payment method (through our 3rd-party payment processor), services purchased;
- Content: Contents of communications, stored documents & media, any sensitive information (as set out below)
- Location: Delivery address, electronic signature geo-location, public check in location data on social media.

Use

Why do we collect, hold, use, and disclose your personal info?

- To communicate with you, to market products and services to you, to tell you important service updates,
- To verify identity or address and delivery information,
- To provide Site functionality,
- To take payment and to give refunds,
- For internal record keeping, invoicing, and billing,
- For analytics, market research and business development, including to operate and improve our Site
- For marketing, to send you promotional info about us and our products and services and information about third parties we think you might be interested in,
- To comply with our legal obligations or to resolve disputes,
- To consider your application to join our team.

3. Sensitive information

How do we manage sensitive info including health & fitness records?

We do not actively collect or use sensitive health information for our own business purposes.

We may, from time to time, receive health information from our clients who warrant to us they have consent to use and disclose that information for their own marketing purposes.

4. Opting out: Changing your preferences

You can opt out of marketing communications at any time by clicking on the link in our communications to unsubscribe.

Storing information

5. Store

How do we store & secure this info?

To help prevent unauthorised access or disclosure, we have general physical, electronic & management processes to securely store personal info & protect it from misuse, loss, unauthorised access, modification & disclosure.

- Whilst we take measures to safeguard against unauthorised disclosures, we can't assure you the personal info we collect won't be disclosed in a way that is inconsistent with this Privacy Policy.
- We do not guarantee the security of any info transmitted to or by us over the Internet.

Disclosing information

6. Disclose

Who do we disclose your personal info to?

- Our service providers, such design and marketing partners, IT service providers, data storage, web-hosting and server providers, debt collectors, maintenance or problem-solving providers, marketing providers, advisors and payment systems operators
- our employees, contractors, and related entities
- our existing or potential agents or business partners, sponsors, or promoters of any competition we run
- anyone we transfer our business or assets to
- credit reporting agencies, courts, or authorities if you do not pay for our goods or services
- Authorised law enforcement agencies who follow the legally required processes, or in connection with any actual or prospective legal proceedings, or to establish, exercise or defend our legal rights
- third parties, including agents or sub-contractors, who help us in providing information, products, services, or direct marketing to you. This may include parties located, or that store data, outside of Australia
- third parties to collect and process data, such as Google Analytics or other relevant businesses, including those that store data outside Australia.

7. Disclosure outside Australia

- Some suppliers we use to provide you services are located outside Australia. We may disclose your personal info outside Australia. Overseas 3rd parties might not be governed by the Privacy Act and might not comply with the Australian Privacy Principles. If those parties breach the Privacy Principles, you aren't protected by the Privacy Act.
- By giving us your personal info, you consent to us disclosing it outside Australia and acknowledge we aren't required to ensure overseas recipients manage your personal info in line with Australian Privacy Law.

Other details

Yes, we may use cookies on our Site from time to time.

Cookies are small text files placed in your computer's browser to store your preferences.

- On their own, cookies do not tell us personal info however, they let others like Google and Facebook, push our adverts to appear on your social media and online media as part of our marketing.
- If you give us personal info, we may link this to the data stored in the cookie.

Yes, we may use web beacons on our Site from time to time.

- Web beacons are small pieces of code placed in a web page or email to monitor behaviour of site visitors and email recipients.
- We may also use Google Analytics to collect and process data. For more details on how Google uses data when you use third party websites or apps, please search Google's site.

10. Links to other websites

Our Sites have links to other websites & applications that we don't control. We cannot and do not protect personal info you share with those other websites. Check those other websites for details of their privacy policies.

11. Changes

We will change this Policy if we change the way we manage your personal info changes or privacy laws change. When we do, we put the updated policy on our Sites and, if possible, we also notify you via email.

12. Complaints and questions

Let us know if you have questions about how we use or manage your info.

- You are responsible for the accuracy of information you decide to give us. If the info we hold about you is incomplete, irrelevant, or otherwise incorrect, please let us know so we can fix it.
- We know we won't always get things perfect, so we appreciate your feedback to improve.

For more info on Australian privacy law, visit .gov.au or contact OAIC via enquiries@oaic.gov.au.