

## Privacy Policy

### Overview

52 Degree Pty Ltd (ABN 94 670 590 726, and our related and associated entities (“we, us, our”) collect and handle Personal Information in accordance with the Privacy Act 1988 (Cth), the Australian Privacy Principles, and all other applicable Australian privacy laws.

‘Personal Information’ has the meaning given in the Privacy Act, but in broad terms, means information which identifies you as an individual or from which you can be reasonably identified.

This Privacy Policy relates to Personal Information we collect and handle about Ourgift2u account holders and visitors to our website, apps, social media, and other digital services, including those of our Affiliates.

The Ourgift2u website is a corporate e-gift card system website provided by us and our Affiliates. ‘Affiliates’ refers to those companies (and other persons) which have agreed with us to provide Ourgift2u account holders with certain benefits.

Ourgift2u is not responsible for the privacy practices or policies of Private Brands, 52 Degree, and our Affiliates, and we recommend that you visit their websites for more information about their privacy practices and policies.

If you do not agree to the terms of this Privacy Policy, you may terminate your Ourgift2u account holder at any time by giving us notice in writing to the following email address: [account\\_holder@ourgift2u.com.au](mailto:account_holder@ourgift2u.com.au)

This Privacy Policy is current as of the date noted above. We may make changes to this Privacy Policy from time to time, in which case we will notify you of the change by displaying an updated version on our website and other digital channels, and/or by sending it to you via email.

### Types of Personal Information Collected

The types of personal information we collect include:

- Name.
- Contact details (e.g., address).
- Identification information (e.g., date of birth).
- Payment and transaction details/history (including information about payment from Web Apps linked to Ourgift2u and associated transactions). However, we do not collect or store credit Web App or debit Web App numbers.
- Authorizations.
- Records of your communications and interactions with us.
- Data related to your activities on Online Channels (as defined in Section 5.3 below) collected via tracking technologies such as cookies and other anonymous identifiers. (In many cases, we will not be able to reasonably identify a particular individual from this information but where we can do so, this Privacy Policy applies, as well as our obligations under the Privacy Act).

- Details and history of preferences, interests, and behaviour relating to transactions, products, services.

We collect information from our Affiliates about your purchases when you haven't presented your Ourgift2u Web App, but where we were able to identify from payment information that you have provided in the Ourgift2u Web App to make a purchase. We use this information on an anonymized, aggregated basis for modelling and research purposes.

### **Anonymity**

You have the option to engage with us anonymously. However, we can only offer anonymity where it is practical to communicate with you anonymously, for example, for general queries raised with the Ourgift2u Customer Service team which don't require identity verification to safeguard the security of your account. If you choose to interact with us anonymously, we may not be able to provide our services to you without your Personal Information. For example, we may not be able to issue points, let you redeem points for awards, manage your account holder, or contact you.

### **Providing us with information about someone else**

Where you provide us with Personal Information about someone else you must have their consent to provide their Personal Information to us.

### **Unsolicited Personal Information**

You must not send any Personal Information to us unless we've requested it from you. If we receive unsolicited Personal Information, we'll manage it in accordance with the Privacy Act.

### **How Personal Information is Collected**

#### Collection of Personal Information by us and Affiliates

Personal Information may be collected from your interactions and transactions with us, Affiliates, and Private Brands, 52 Degree, group companies, including for example when you:

- use your Ourgift2uWeb App or account holder or phone number or associated identifiers when making payments and purchases in the Ourgift2u Web App.
- place an order online.
- participate in a promotion, competition, or survey.
- register for services; including services provided by Affiliates; or
- use Online Channels.

We may monitor and record your communications with us (including email and telephone) for security, dispute resolution, and training purposes.

#### Collection of Personal Information from Third Parties

We may also collect personal information from third parties including:

- public sources and registers.
- information service providers (e.g., to help us ensure that the personal information we hold is accurate, up to date, and complete, and for data integrity purposes).

- Affiliates who administer Private Brands products and services.
- anyone authorized to act on your behalf.
- Affiliates, Private Brands, and 52 Degrees group companies.
- service providers who help us to administer the Ourgift2uwebsite; and
- Ourgift2u media and advertising Affiliates, to enable us to provide them with aggregated and de-identified data and services for targeted advertising purposes (as further described in the “Targeted Advertising” section below).

#### Collection of Data via Cookies and Other Technologies

We may use “cookies” on Online Channels to collect data. A cookie is a small piece of information stored on your device or computer when you interact with online content (e.g., websites, apps, and emails). Cookies are used to identify and interact more effectively with your device, as well as to collect and store data.

We may also use other tracking or data collection technologies across Online Channels, including web beacons (which may operate in conjunction with cookies), Flash local stored objects, and JavaScript.

#### **Storage and Security of Personal Information**

We hold personal information electronically and in hard copy form, both at our own premises and with the assistance of our service providers. We implement a range of measures to protect the security of that personal information. Examples of these measures include:

- access to Personal Information is controlled through identity and access management systems.
- staff account holders are bound by internal information security policies and are required to keep Personal Information secure at all times.
- we take steps to protect Personal Information in accordance with the Office of the Australian Information Commissioner’s Guide to securing personal information; and
- we also take measures to destroy or de-identify Personal Information that is no longer needed for any lawful purpose.

#### **Purposes for Handling Personal Information**

##### Registration and Use of the Ourgift2u Website

We manage your Personal Information in connection with providing, administering, improving, and personalizing the Ourgift2uwebsite, Ourgift2uproducts and services, and those provided by our Affiliates, Private Brands, and 52 Degrees group companies. This can include:

- to register and service your account holder account, including keeping your information up-to-date and verifying your identity.
- to communicate with you about our and our Affiliates’ products, services, and promotions (including via direct as described below).
- to help us and our Affiliates improve our products and services, including conducting product and market research.

- to improve our understanding of your interests and behaviour in relation to products, services, and offers.
- to improve our operational processes to enhance your customer experience.
- to respond to your feedback, queries, or concerns; or
- investigative, fraud and loss prevention activities.

### Offers and Communications

We may provide offers, communications, and targeted advertising to you on an ongoing basis by telephone, electronic messages (e.g., email), websites, social media, and other Online Channels, and by other means. These communications may relate to the products and services we, Affiliates, Private Brands, and 52 Degrees group companies provide, and other products which we think may be of interest to you.

If you have purchased a product or service from our Affiliates and used your Ourgift2u Web App, that Affiliate may also provide you with offers and communications, including by email or other form of electronic messages. These communications may relate to products or services that the Affiliates provide and which the Affiliates think may be of interest to you.

Log into your Ourgift2u account at <https://ourgift2u.com.au/> at any time to opt-out of electronic and telephone direct communications from us. You can also use the unsubscribe facility provided in Ourgift2u electronic communications.

If you elect to opt out, you will still receive service-based communications relating to your Ourgift2u account holders and account, as well as other information that we are required to send you by law, such as changes to our terms and conditions and notifications relating to your transactions and purchases.

To opt-out of any communications received from our Affiliates, you can use the unsubscribe facility provided in the relevant Affiliate's electronic communication.

### **When You Interact with Us Online**

You may interact with us, our Affiliates, Private Brands, or 52 Degree group companies, our service providers, or our other business Affiliates through a range of digital and online channels, including:

- websites (e.g., <https://ourgift2u.com.au/> or the websites of Affiliates).
- apps.
- email.
- online advertisements.
- IPTV; and
- social media profiles, ("Online Channels").

We may collect and manage your Personal Information and other data collected via these Online Channels for a range of purposes, including to provide a consistent experience, personalize your use of each of those Online Channels, and to provide targeted.

Some of the information we collect from these Online Channels is not related to an individual. In many cases, the information relates only to a device or is of an aggregated or statistical nature, and we will have no way of knowing the identity of the user. In other cases,

we may associate information about your use of Online Channels over time with your Personal Information, for example, when you have logged in to your Ourgift2uaccount or followed a link sent to you by email.

### **How We Use Cookies and Anonymous Identifiers**

We may use cookies and other technologies to track your access to and use of Online Channels, and to customize and improve your interactions with them. Examples of how we use cookies and other technologies include:

- to maintain the continuity of your browsing session (e.g., to remember the items in your shopping cart).
- to remember your details and preferences when you return.
- to record information about your interactions with the Online Channels including information about software versions used, device types, device identifiers (like IP address), location data (where available and not disabled by the user), dates, times, file metadata, referring website, data entered, and user activity (such as links clicked).

Some of these cookies and other technologies are consistent across various Online Channels, allowing other providers of those Online Channels to understand you better and provide a more consistent experience across those Online Channels.

### **Third Party Cookies and Data Collection**

In some cases, we may receive data from our service providers which is collected via third-party cookies and other technologies used on the Online Channels. We may use this data in connection with activities like managing, administering, and expanding the Ourgift2uwebsite, surveys, targeted advertising, website analytics, and email campaign management.

The data received by these third-party cookies and other technologies that are used on Online Channels is collected directly by the relevant third parties and is subject to the individual privacy policies of those third parties.

### **Third Party Targeted Advertising**

For Affiliates with media, technology, and advertising companies, Ourgift2umay provide aggregated audience segments to advertisers which are based on de-identified member data. This enables advertisers to provide you with more personalized and targeted advertising when you use our Affiliates' websites, social media, and other platforms.

Ourgift2u also provides Affiliates and advertisers with anonymized analysis, reporting, and insight services related to their use of Ourgift2u data for advertising. Ourgift2u does not share any of your Personal Information with its Affiliates or advertisers in connection with these advertising services.

We may receive cookie data, device information, or other anonymous identifier information from our Affiliates to enable us to provide these services. In some cases, Ourgift2u may be able to connect this data back to individual Ourgift2u account holders. Store data is not retained for longer than is necessary for us to provide services to our Affiliates and advertisers.

### **How to opt Out of Targeted Advertising**

The third-party platforms that use Ourgift2u aggregated audience segments include those offered by Google, Yahoo!, Adobe, The Trade Desk, LiveRamp, Amobee, MediaMath, Instagram, X, and Facebook. You can find information on how to opt out of receiving targeted advertising on these platforms by reading the individual privacy policies of those platforms. You may need to opt out separately from each platform.

### **Regulatory Purposes and to Facilitate Our Corporate Activities**

Personal Information may be handled:

- to protect our lawful interests and facilitate purchases and potential purchases of our businesses.
- to comply with any request for information made by a regulator, court, government entity, health department, or contact tracing agency (including any requests to provide information for COVID-19 contact tracing); or
- as otherwise permitted or required by law.

### **Sharing of Personal Information**

#### Sharing with Affiliates

We may share and combine Personal Information with Affiliates (and Affiliates may share and combine such Personal Information with other Affiliates that are part of the same corporate group):

- to allow Affiliates to engage with you and provide you with more personalized and targeted advertising when you use the Affiliates' websites, third-party websites, social media, apps, and other platforms.
- to allow Affiliates to personalize the communications, offers, customer surveys, and trading updates that they send to you.
- to enable Affiliates to improve product offerings, service offerings, advertising, and offers based on member shopping and browsing habits.
- for the purpose of developing aggregated insights about the preferences of Ourgift2uaccount holders who shop at an Affiliate.
- for the purpose of analytics including for insights and strategic and operational decision-making.
- for product safety-related matters (including recalls).
- where you have provided express or inferred consent to us or an Affiliate; and
- for any other purpose described in this Privacy Policy.

Affiliates may also collect Personal Information directly from you (and from other sources set out in their respective privacy policies) and may combine the Personal Information that they receive from Ourgift2u with other Personal Information they collect from or about you. That combined Personal Information may be shared by Affiliates with us, and we may share that combined Personal Information with other Affiliates.

Affiliates will handle your Personal Information in accordance with their privacy policies (which can be located on their respective company websites) and in accordance with the Privacy Act 1988 (Cth) (including the Australian Privacy Principles). This may involve the

Affiliates retaining Personal Information about a Ourgift2u member after that person has ceased to be a Ourgift2u member (or after the Affiliates has ceased to be an Affiliate) if required by law.

#### Sharing with Service Providers and Third Parties

Personal Information may be shared with service providers and other third parties engaged to assist with conducting the Ourgift2u website or providing services and products, including companies that assist us with:

- technology services including application development and technical support, processing, storing, hosting, and analysing data.
- processing payments.
- communicating our offers and promotions to you.
- product development and market research; and
- administrative services, including mailing services, printing, archival, and contact management services.

If you've chosen to share your Ourgift2uaccount with one or more additional account holders, some of your Personal Information may be visible to those additional account holders. Personal Information may also be shared with any potential purchaser of the Ourgift2u business (or part of the Ourgift2u business) and related professional advisors.

#### Sharing with Regulators and Courts

Personal Information may be shared with law enforcement, regulators, courts, government entities, health departments, and contact tracing agencies for public health, regulatory, and enforcement purposes including:

- in order to respond to lawful information requests from courts, regulators, law enforcement, government entities, and health departments.
- to protect our lawful interests; and
- to provide information for COVID-19 contact tracing purposes, in which case you may be contacted by a health department or contact tracing agency.

#### Sharing Overseas

The third parties to whom we disclose Personal Information may be located in Australia and other countries. From time to time, the countries to which we send Personal Information may change. Steps are taken to ensure that all our service providers are obliged to protect the privacy and security of your Personal Information in accordance with the standards that apply in Australia, including that they only use Personal Information for the purpose for which it is disclosed.

#### **Links to Third Party Sites**

Our website, social media pages, and apps may contain links to other sites. We are not responsible for the privacy practices or policies of those sites and recommend that you review their privacy policies.

#### **Procedures for Access and Correction of Your Personal Information**

If you wish to access or correct any personal information we hold about you, please contact us as set out below. When making an access request, please provide as much detail as you can about the particular information you seek in order to help us retrieve it. Under the Privacy Act and other relevant laws, we are required to provide a written response outlining our reasons if we refuse your request.

Where we decide not to make a requested correction and you disagree, you may ask us to add a note of your requested correction to the information that explains your correction request.

### **Questions and Complaints**

If you have any complaints or concerns about this Policy, or our handling of your Personal Information, you can contact us as set out below. Once a complaint or concern has been lodged, we will let you know when you can expect a full response in regard to your matter. If you are not satisfied with our response, please let us know and we will investigate further and respond to you.

Complaints should be directed to us in the first instance. If you are still not satisfied, you can contact the Office of the Australian Information Commissioner, whose contact details are set out below.

### **Contact Us**

Queries regarding privacy should be directed to Ourgift2uCustomer Service:

Email: [customerservice@oourgist2u.com.au](mailto:customerservice@oourgist2u.com.au)

The Ourgift2uPrivacy Policy can be found on <https://ourgift2u.com.au/>.

Office of the Australian Information Commissioner

Post: GPO Box 5218, Sydney NSW 2001

Phone: 1300 363 992

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

Web: [www.oaic.gov.au](http://www.oaic.gov.au)

### **Additional Privacy Information**

In addition to this Privacy Policy, our Affiliates, Private Brands, and 52 Degrees group companies have their own privacy statements and other terms which provide further information about the handling of your Personal Information that has been shared with these third parties. We are not responsible for the privacy practices or policies of these third parties and recommend that you review their respective privacy policies.

For information about privacy generally, you may contact the Office of the Australian Information Commissioner on the contact details available at [www.oaic.gov.au](http://www.oaic.gov.au).