



Privacy Policy

May 2017

1 Privacy Policy

- (a) This is the privacy policy of Xeppo Pty Ltd (ACN 164 028 684) ('**Xeppo**', '**we**'). The purpose of this policy is to ensure that any individual who provides information to Xeppo is protected under Australian law, in accordance with the Privacy Act 1988 (Cth) ('**Privacy Act**').
- (b) Words defined in the Privacy Act have the same meaning when used in this policy.

2 Protecting your privacy

- (a) We seek to protect and maintain the privacy, accuracy and security of your information. We will comply with the Australian Privacy Principles ('**APPs**') in the Privacy Act.
- (b) Xeppo provides the infrastructure and software as a service to the client and does not handle, use or process any of the information held by its clients other than for your use.

3 Collection of information

- (a) Our customers include professional service providers and collect information through Xeppo Application Connectors from different data sources, including but not limited to Customer Relationship Management Systems pertaining to data regarding your clients. ('**information**').
- (b) Information we collect includes, but is not limited to:
 - (i) your or your employees':
 - (A) name;
 - (B) *date of birth and gender;*
 - (C) *email addresses; and*
 - (D) *telephone and mobile numbers; ('**your information**') and*
 - (ii) your clients':
 - (A) *name;*
 - (B) *date of birth;*
 - (C) *gender;*
 - (D) *email addresses;*
 - (E) *tax file number;*

- (F) *financial information; and*
 - (G) *telephone and mobile numbers ('your clients' information').*
- (c) We do not collect sensitive information about you such as your racial or ethnic origin, political opinions, religious beliefs or affiliations.
 - (d) If you provide information of any other person you warrant that the other person has consented to the collection of their information for the reasons it is being collected.

4 If you do not provide information

The main consequence for you, if some or all of the above information is not collected by us is that we may not be able to provide goods, services or information to you, or be able to provide them to the same standard as if we had the information requested.

5 How we collect information

We collect information about you and your clients from the Xeppo Application Connector and from our website when you make a request or enquiry.

6 Why we collect, hold and use and disclose information

- (a) We collect, hold, use and disclose your and your clients' information when it is necessary for us to carry on our business functions or to comply with laws.
- (b) We may collect, hold, use and disclose your or your clients' information to answer your enquiry or to provide the information or service that you requested.
- (c) We may also collect, hold, use or disclose your information:
 - (i) to enable us to develop, administer and manage our services and business;
 - (ii) to customise service to better meet your needs and preferences;
 - (iii) statistical purposes;
 - (iv) future promotional and marketing purposes including direct marketing;
 - (v) for research purposes to better improve our websites, products or services;
 - (vi) other customer support purposes;
 - (vii) to deal with complaints; and
 - (viii) when authorised or required by law.
- (d) We may also collect, hold, use or disclose your clients' information:

- (i) to link Customer Relationship Management Systems into the Xeppo Application Connector;
- (ii) to fix any technical issues in the Xeppo Application Connector;
- (iii) to enable us to develop, administer and manage our services and business;
- (iv) to customise service to better meet your needs and preferences;
- (v) for research purposes to better improve our products or services;
- (vi) other customer support purposes;
- (vii) to deal with complaints; and
- (viii) when authorised or required by law.

7 Direct Marketing

Xeppo may send you marketing material. You may choose to “opt-out” of receiving this material by contacting us using the details below. Xeppo will not charge you any additional cost or in any way disadvantage you for choosing to “opt-out” of receiving marketing material.

8 When we may disclose your information to third parties

- (a) In the course of conducting our business we may provide your information to:
 - (i) our related companies
 - (ii) our customers and clients; or
 - (iii) our professional advisers, including our lawyers, auditors and accountants.
- (b) We may disclose your information to third parties:
 - (i) to meet the purpose for which it was submitted;
 - (ii) if we have your consent to do so or otherwise when we are authorised by law; or
 - (iii) if we are required by law to disclose the information.
- (c) We will not provide your clients’ information to our professional advisers, including our lawyers, auditors and accountants.

9 Overseas recipients

We will not disclose information to overseas recipients.

10 Security

All information held by us will be handled and stored in accordance with our obligations under the Privacy Act. We will take reasonable steps to:

- (a) make sure that the information we collect, use or disclose is accurate, complete and up to date;
- (b) protect the information from misuse, interference, loss or unauthorised access, modification or disclosure both physically and through security methods; and
- (c) destroy or permanently de-identify the information if it is no longer needed for any purpose.

11 Website

- (a) When you visit our website or access the Xeppo Application Connector, we or agencies on our behalf and our internet service provider may monitor and take a record of your visit and log “clickstream data” for statistical purposes such as your server’s IP address.
- (b) This privacy policy is strictly limited to the collection, storage and use of personally identifiable information collected by Xeppo, in the course of business, and does not apply to any third parties. We have no control over the privacy practices or the content of any third party websites, and assume no liability for the privacy practices of these websites.
- (c) Any Link on the Xeppo site to external entities are not covered within this policy. The terms and conditions set out in this privacy statement only cover the domain name of <http://www.xeppo.com.au/>.

12 Privacy

- (a) At your request we will provide details of the information we hold about you or your clients. The release of information is subject to some exceptions such as information relating to existing or any anticipated legal proceeding, together with exceptions provided by the Privacy Act.
- (b) Unless unusual circumstances apply, we should provide access to you within 30 days of the request.
- (c) We reserve the right to charge a fee for providing access to your information to your information when permitted by law.
- (d) To protect your information and your clients’, the request to us must be in writing and can be sent by letter or facsimile or email. All correspondence should be addressed to:

Mail: Xeppo Administration

Level 4, 81 Flinders St ADELAIDE SA 5000

Email: support@xeppo.com.au

- (e) Our objective is to respond to any request within a reasonable timeframe.
- (f) We also aim to ensure that information is accurate, up to date and complete. Amendment of information will be conducted upon written or verbal request from you. You can contact us on support@xeppo.com.au or write to the mailing address to do this.

13 Complaints

- (a) We are committed to the protection of your privacy and information. Complaints you may have about your information or your clients' information can be lodged with us by using the contact details above.
- (b) We will attempt to resolve any complaints within 10 working days. If resolution is not possible within this timeframe we will contact you to discuss the matter further.
- (c) You also have the right under the Privacy Act to make a complaint to the Information Commissioner.

14 Changes to this policy

This policy is subject to change over time without prior notice. We may amend this policy by updating this posting.

15 Copies of this policy

You can ask us to provide you with a copy of this policy, including a hard copy, by contacting us using the contact details above.

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