



# Privacy and Cookies Policy

## 1 Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors and customers. In this policy we explain what information we collect, how we collect and hold it, why we collect it, what we do with it, and who we share it with. This Policy also shows how we comply with our obligations under Australian privacy laws and, in particular, the *Privacy Act 1988* (Cth).
- 1.2 This policy applies where we control personal information collected from you.
- 1.3 We may use cookies on our website. If those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website.
- 1.4 In this policy, "we", "us" and "our" refer to Travelling Tradies Australia Pty Ltd (ABN 32 625 363 671).

## 2 The personal information that we collect

- 2.1 In this Section we set out the general categories of personal information that we process and, in the case of personal information that we did not obtain directly from you, information about the source and specific categories of that information.
- 2.2 We will collect and process personal information enabling us to get in touch with you ("**contact data**"). The contact data may include your name, date of birth, email address, telephone number, postal address, trade licence numbers, insurance details and/or social media account identifiers. The source of the contact data is you and/or your employee (if you sign up as a venue).
- 2.3 We may collect information relating to our customer relationships ("**customer relationship data**"). The customer relationship data may include your name, the name of your business or employer, your trade, job title or role, your contact details, your classification / categorisation within our customer relationship management system and information contained in or relating to communications between us and you, or between us and your employer. The source of the customer relationship data is you and/or your employer.
- 2.4 We may process information relating to transactions you enter into on our website, including purchases of goods, services and/or TT Coin ("**transaction data**"). The transaction data may include your name, your contact details, your payment card details (or other payment details) and the transaction details. The source of the transaction data is you and/or our payment services provider.
- 2.5 We may collect information contained in or relating to any communication that you send to us or that we send to you ("**communication data**"). The communication data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms.
- 2.6 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system.
- 2.7 If you have signed up as a venue, we may collect and process information in relation to your venue. This data may include the address of your venue, works required and stay or services experiences offered, including the cost of those stays or services. The source of this data will generally be you, your employee who signs up the venue or from online booking sites..
- 2.8 If you are a tradie, we may collect and process information relating to your skills and experience. This information may include your qualifications, years of experience, your gender and your age group. The source of this data will generally be you or other public data sources.

### 3 Purposes of processing and legal bases

- 3.1 In this Section, we set out the purposes for which we may collect and process personal information and the legal bases on which we do so.
- 3.2 **Operations:** We may collect your personal information for the purposes of operating our website, the processing and fulfilment of orders, providing our services, generating invoices, bills and other payment-related documentation, and credit control. The legal basis for this processing is our legitimate interests, namely the proper administration of our website/platform, applications, services and business.
- 3.3 **Publications:** We may process your account data for the purposes of publishing such data on our website and elsewhere through our services in accordance with your express instructions. The legal basis for this processing is your consent for us to do so when you sign up on our website as a tradie or a venue.
- 3.4 **Relationships and communications:** We may collect and process contact data, account data, customer relationship data, transaction data and/or communication data for the purposes of managing our relationships, communicating with you (excluding communicating for the purposes of direct marketing) by email, SMS, post and/or telephone, providing support services and complaint handling. The legal basis for collecting and processing this information is our legitimate interests, namely communications with our website visitors, service users, individual customers and customer personnel, the maintenance of our relationships, enabling the use of our services, and the proper administration of our website/platform, applications, services and business.
- 3.5 **Personalisation:** We may process account data and/or usage data for the purposes of personalising the content and advertisements that you see on our website and through our services to ensure that you only see material that is relevant to you. The legal basis for this processing is our legitimate business interests, namely offering the best possible experience for our website visitors and service users.
- 3.6 **Direct marketing:** We may process contact data, account data, customer relationship data and/or transaction data for the purposes of creating, targeting and sending direct marketing communications by email, SMS and/or post and making contact by telephone for marketing-related purposes. The legal basis for this processing is our legitimate interests, namely promoting our business and communicating marketing messages and offers to our website visitors and service users.
- 3.7 **Research and analysis:** We may process usage data and/or transaction data for the purposes of researching and analysing the use of our website and services, as well as researching and analysing other interactions with our business. The legal basis for this processing is our legitimate interests, namely monitoring, supporting, improving and securing our website, services and business generally.
- 3.8 **Record keeping:** We may process your personal information for the purposes of creating and maintaining our databases, back-up copies of our databases and our business records generally. The legal basis for this processing is our legitimate interests, namely ensuring that we have access to all the information we need to properly and efficiently run our business in accordance with this policy.
- 3.9 **Security:** We may process your personal information for the purposes of security and the prevention of fraud and other criminal activity. The legal basis of this processing is our legitimate interests, namely the protection of our website, services and business, and the protection of others.
- 3.10 **Insurance and risk management:** We may process your personal information where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks and/or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 3.11 **Legal claims:** We may process your personal information where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 3.12 **Legal compliance and vital interests:** We may also process your personal information where such processing is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another person.

### 4 Providing your personal information to others

- 4.1 If you are a tradie, you explicitly agree to us providing your personal information to venues.
- 4.2 If you are a venue, you explicitly agree to us providing your providing your personal information to tradies. \*
- 4.3 We may disclose your personal information to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy.
- 4.4 We may disclose your personal information to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice.
- 4.5 Your personal information held in our website database will be stored on the servers of our hosting services providers. Some of those service providers are located within Australia and some are located outside of Australia. Where your personal information is stored on servers located outside Australia, the countries in which those servers are located have privacy laws that are commensurate with Australia's privacy laws. By signing up as a tradie or venue, you explicitly agree to your personal information being stored outside Australia.
- 4.6 You acknowledge that personal information that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal information by others.
- 4.7 We may disclose your personal information to our suppliers or subcontractors from time-to-time and as is reasonably necessary for us to provide you with our services.
- 4.8 Financial transactions relating to our website and services are handled by our payment services providers, Stripe. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices at [www.stripe.com](http://www.stripe.com).
- 4.9 We may disclose contact data along with any other personal information contained in enquiries made through our website or services to one or more of those selected third party suppliers of goods and/or services identified on our website for the purpose of enabling them to contact you so that they can offer, market and sell to you relevant goods and/or services.
- 4.10 In addition to the specific disclosures of personal information set out in this Section, we may disclose your personal information where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal information where such disclosure is necessary for the establishment, exercise, or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

## **5 Retaining and deleting personal information**

- 5.1 This Section sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal information.
- 5.2 Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 5.3 In some cases it is not possible for us to specify in advance the periods for which your personal information will be retained. In such cases, we will determine the period of retention based on the following criteria:
- 5.4 Notwithstanding the other provisions of this Section, we may retain your personal information where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **6 Security of personal information**

- 6.1 We will take appropriate technical and organisational precautions to secure your personal information and to prevent the loss, misuse or alteration of your personal information.
- 6.2 We will store your personal information on secure servers, personal computers and mobile devices, and in secure manual record-keeping systems.

- 6.3 The following personal information will be stored by us in encrypted form: your name, contact information, password(s), qualifications and work experience.
- 6.4 Data relating to your enquiries and financial transactions that is sent from your web browser to our web server, or from our web server to your web browser, will be protected using encryption technology.
- 6.5 You acknowledge that the transmission of unencrypted (or inadequately encrypted) data over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.
- 6.6 You should ensure that your password is not susceptible to being guessed, whether by a person or a computer program. You are responsible for keeping the password you use for accessing our website confidential and we will not ask you for your password (except when you log in to our website).

## **7 Updating information**

You have the right to access, update and correct your Personal Information held by us. To do this, please contact [support@travellingtradies.com](mailto:support@travellingtradies.com) and outline your request and contact details or update your information directly in your account details on the application. We will contact you to verify your identity before we provide you with any Personal Information. You should be aware that we may not always be able to allow you access – for example, where we are prohibited by law or if somebody else’s privacy is at risk. If this occurs, we will make sure you know the reasons why.

## **8 Your rights**

- 8.1 In this Section, we have listed the rights that you have under Australian privacy laws.
- 8.2 Your principal rights as an individual under Australian privacy laws are:
  - (a) know why your personal information is being collected, how it will be used and who it will be disclosed to;
  - (b) have the option of not identifying yourself, or of using a pseudonym in certain circumstances;
  - (c) ask for access to your personal information (including your health information);
  - (d) stop receiving unwanted direct marketing;
  - (e) ask for your personal information that is incorrect to be corrected; and
  - (f) make a complaint about an organisation or agency the Privacy Act covers, if you think they’ve mishandled your personal information.
- 8.3 These rights are subject to certain limitations and exceptions. You can learn more about your rights at: <https://www.oaic.gov.au/privacy/the-privacy-act/rights-and-responsibilities>.
- 8.4 You may exercise any of your rights in relation to your personal information by written notice to us, using the contact details set out below.

## **9 Third party websites**

- 9.1 Our website may include hyperlinks to, and details of, third party websites.
- 9.2 In general we have no control over, and are not responsible for, the privacy policies and practices of third parties.

## **10 Personal information of children**

- 10.1 Our website and services are targeted at persons over the age of 18.
- 10.2 If we have reason to believe that we hold personal information of a person under that age in our databases, we will delete that personal information.

## **11 About cookies**

- 11.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

- 11.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 11.3 Cookies may not contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## 12 Cookies that we use

12.1 We use cookies for the following purposes:

- (a) **authentication and status:** we use cookies to identify you when you visit our website and as you navigate our website, and to help us determine if you are logged into our website;;
- (b) **shopping cart:** we use cookies to maintain the state of your shopping cart as you navigate our website;
- (c) **personalization:** we use cookies to store information about your preferences and to personalise our website for you;;
- (d) **security:** we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally;
- (e) **advertising:** we use cookies to help us to display advertisements that will be relevant to you;
- (f) **analysis:** we use cookies to help us to analyse the use and performance of our website and services; and
- (g) **cookie consent:** we use cookies to store your preferences in relation to the use of cookies more generally.

## 13 Cookies used by our service providers

- 13.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.
- 13.2 We use Google Analytics. Google Analytics gathers information about the use of our website by means of cookies. The information gathered is used to create reports about the use of our website. You can find out more about Google's use of information by visiting <https://www.google.com/policies/privacy/partners/> and you can review Google's privacy policy at <https://policies.google.com/privacy>.
- 13.3 We use a Meta (formerly Facebook) pixel on our website. Using the pixel, Meta collects information about the users and use of our website. The information is used to personalise Meta advertisements and to analyse the use of our website. To find out more about the Meta pixel and about Meta's use of personal information generally, see the Meta cookie policy at <https://www.facebook.com/policies/cookies/> and the Meta privacy policy at <https://www.facebook.com/about/privacy>. The Meta cookie policy includes information about controlling Meta's use of cookies to show you advertisements. If you are a registered Meta user, you can adjust how advertisements are targeted by following the instructions at <https://www.facebook.com/help/568137493302217>.

## 14 Managing cookies

- 14.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:
- (a) <https://support.google.com/chrome/answer/95647> (Chrome);
  - (b) <https://support.mozilla.org/en-US/kb/enhanced-tracking-protection-firefox-desktop> (Firefox);
  - (c) <https://help.opera.com/en/latest/security-and-privacy/> (Opera);
  - (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
  - (e) <https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data-sfri11471/mac> (Safari); and
  - (f) <https://support.microsoft.com/en-gb/help/4468242/microsoft-edge-browsing-data-and-privacy> (Edge).

14.2 Blocking all cookies will have a negative impact upon the usability of many websites.

14.3 If you block cookies, you will not be able to use all the features on our website.

## **15 Cookie preferences**

We will ask your consent to accept or reject Cookies. You can do so by selecting the appropriate tick box.

## **16 Amendments**

16.1 We may update this policy from time to time by publishing a new version on our website.

16.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

## **17 Our details**

17.1 This website is owned and operated by Travelling Tradies Australia Pty Ltd.

17.2 We are registered in Victoria, Australia and our registered office is at 92 Rupert Street, Collingwood, Vic, 3066.

17.3 You can contact us:

- (a) by post, to the postal address given above;
- (b) using our website contact form;
- (c) by telephone, on the contact number published on our website; or
- (d) by email, using the email address published on our website.

## **18 Privacy officer**

Our privacy officer's contact details are: Adam Valastro – [adam@travellingtradies.com](mailto:adam@travellingtradies.com) - +61490501875].

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