

PRIVACY POLICY

Cloud Vitality Operations Pty Ltd (CVO) is committed to offering you a robust, reliable, secure and private service. We are committed to your privacy and guard your data carefully.

The online environment provides unprecedented access to information, but the convergence of communication and information technologies also brings a range of information privacy issues to the centre of public concern.

To ensure your privacy, we have appointed a Privacy Officer to monitor our compliance with the various privacy obligations imposed by law, as well as those that we voluntarily take on. We fully comply with best practice standards recommended by the Internet Industry Association (IIA).

The Privacy Officer reports to our Managing Director. Should you have any questions or complaints about privacy issues, please contact the Privacy Officer at privacyofficer@cloudvitality.com.

CLOUD VITALITY OPERATIONS' OBLIGATIONS

CVO has many obligations concerning protecting your privacy under various Federal Government Acts of Parliament, including the Telecommunications Act 1997. For more information on our obligations with your personal particulars, visit the Australian Privacy Commissioner's Website at [Home — OAIC](#)

CVO has voluntarily subscribed to the Internet Industry Association (IIA) Code of Conduct and abides by the Australian Privacy Principles. For more information, see [Australian Privacy Principles — OAIC](#).

WHAT INFORMATION DO WE COLLECT, AND HOW DO WE USE IT?

CVO does collect information about you at different times. Instances include

- Mandatory personal information needed for us to provide a service to you
- Non-personally identifiable (specific or aggregated) information to improve our services
- Personal information voluntarily provided by you – for CVO surveys, at CVO sites, and in conjunction with third party offers

1. MANDATORY PERSONAL INFORMATION COLLECTED

When you first apply for a CVO service, information such as your name, contact details, age and gender are requested. We will not disclose this personal information unless we have received your express consent to do so. The only exception to this is if it is required by law – that is, to answer a subpoena, warrant or in response to other legal processes, including requests from the Australian Stock Exchange.

2. NON-PERSONALLY IDENTIFIABLE INFORMATION COLLECTED

Apart from this mandatory information we need to provide our service to you, there may be data (that does not personally identify you) collected to monitor and improve CVO's service and performance.

For example, when you visit a web page, the URL requested is automatically recorded, as is the time and date requested and the browser software being used.

Specific or aggregate information may be collected to help maintain accurate accounts, assist in marketing our products and services, and help make our Website useful to you. For example, our server recognises your domain name and the pages that you visit. This data is gathered in an aggregate manner for quality control and improvement of our sites.

From time to time, CVO may provide aggregated statistical information about sales, browsing patterns and navigation techniques to reputable third parties. This is not personally identifiable information and assists CVO to improve products and services offered.

What are "Cookies"? A cookie is a message given to a web browser by a web server, which it stores for later use, so when you revisit the web site, your browser recognises your preferences. Cookies generally enhance

your Internet experience, but if you don't want to receive cookies, you can set your browser to notify you when you receive one, so you decide whether to accept them or not.

3. PERSONAL INFORMATION VOLUNTARILY PROVIDED BY YOU

CVO SURVEYS

We collect information that you volunteer to us on surveys, contests and registration pages. If ever you volunteer to be involved with a customer base survey, we use the information collected only to improve the CVO online experience. These surveys are strictly confidential.

THIRD-PARTY OFFERS AND SUBSCRIPTIONS AT THE CVO SITE

We do not reveal, disclose, sell, distribute, rent, license, share, or pass your personal information to any third parties without your consent.

CVO may form relationships with other organisations to bring you special offers, competitions, and subscriptions from time to time. For any third party offer or subscription, we require as a matter of policy that the third party clearly states their intentions with any information gathered and attaches their privacy policy as a hyperlink to the offer or subscription.

The terms and conditions of the offer should also be clearly stated.

Please read this information carefully, and understand that it is your own choice should you choose to disclose your personally identifiable information to a third party. The information that you offer to the third party is voluntary. If the third party offer involves an ongoing communication such as a newsletter, we require as a matter of policy that there be an easy-to-use unsubscribe function, so you can opt-out when you want to.

CVO enters into third party business relationships with care and will not share, disclose or sell any personally identifiable information collected at our site with third-party companies or organisations without these conditions being met.

HOW TO ACCESS, CORRECT OR UPDATE YOUR PERSONAL INFORMATION AT CVO

Only authorised persons have access to your personal information, which we keep in a secure environment. We realise it is vital for you to control your personal details; you can contact us at the contact details below to review, change or request removal of any personal details.

If you call CVO by telephone, before any customer personal information is revealed or discussed, you must correctly answer the verification of identity questions as a security measure.

Whilst CVO undertakes all reasonable steps to protect your personal information, sending and receiving information over the Internet is always at your own risk. No guarantee can be given that information sent over the Internet is completely and 100% secure.

HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

High technology is used to ensure your sensitive information is secure and is protected from unauthorised access or improper use. For example, you will note that while using some features of the CVO website and online services such as Online Service Management, you need to submit a password before you gain access.

Your personal password is confidential and is encrypted to ensure its secrecy. With your password, you can edit your personal details via our website members portal.

Particularly sensitive information such as your credit card number is not stored in a server that is connected to the Internet. All transmission of data for billing and collections is done via encrypted transmission between CVO and the bank.

UNSOLICITED COMMERCIAL EMAIL (UCE) OR "SPAM."

Spam is the Internet term for marketing or commercial email you receive for which you did not ask. CVO does not and has never supported or condoned this practice.

We have configured our mail servers not to be directly used by a third party to send unsolicited commercial email or used as a staging post for an email attack on CVO members or any other group. Furthermore, all mail being sent from our Mail Servers requires authentication using your CVO user account and password.

We require our members to do the same to prevent their mail gateways from being abused similarly.

Our Acceptable Use Policy states that we will not allow our service to be used by you to send such unsolicited email. You can access our Acceptable Use Policy from our Website under resources.

Marketing mail from CVO will generally be "opt-in" / "opt-out". This means that you should not receive any commercial or marketing email from us unless you have requested it; that is, you have opted in. When you opt in, every piece of commercial email will contain an opt-out option or unsubscribe function. You can send us a message telling us you would prefer not to receive the mail again, and we will respect your wishes.

Emails relating to a pre-existing business relationship such as billing and service communications are not spam. These communications include but are not limited to the regular monthly CVO customer newsletter and any billing information we forward to you by email.

These communications are an essential part of providing our service, and you agree to these when you join our service as a part of the terms and conditions.

CHILDREN'S PRIVACY

We do not market to children or knowingly collect personal information about children without parental consent.

Children should always ask a parent before sending any transmission over the Internet.

POINTERS TO PROTECT YOUR PRIVACY

- CVO will never request your complete credit card details in an email. Do not ever submit your complete credit card details in email format.
- Never offer credit card details in a chat room, via instant messaging services or in any other IRC environment.
- Always close your browser and log out once you have finished surfing the net to prevent other people from gaining access to your information and correspondence.
- CVO has no control over other web sites we may link to, and we take no responsibility for the conduct of these companies. Always read the Terms and Conditions when using other web sites.
- Keep your passwords and account details secret. If unauthorised access to your account occurs, please inform us immediately.
- Beware of posting personal information in public forums such as Internet chat groups or newsgroups. If you voluntarily disclose personal information, it may be collected and used by others.

PRIVACY OFFICER CONTACT

Should you have any questions or complaints about privacy issues, please contact the CVO privacy officer at privacyofficer@cloudvitality.com