

PRIVACY POLICY

This Privacy Policy sets out how:

- if you are a user in Australia, Imperium iQ Pty Ltd (ABN 40648203650); or
- if you are a user in New Zealand, Imperium iQ Limited (NZBN 9429050761043)

(collectively, **we, us or our**) collects, uses and manages personal information.

This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or otherwise collected by us when providing our car parking operation, management, monitoring and enforcement services, including via our car parking mobile application and website (**Services**) to you or when otherwise interacting with you.

This Privacy Policy takes into account the requirements of the *Privacy Act 1988* (Cth) in Australia and the Privacy Act 2020 in New Zealand.

The information we collect

Personal information: is information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable.

The types of personal information we may collect about you include:

- **Identity Data** including first name, middle name, last name, title, and images of you and/or your vehicle.
- **Contact Data** including billing address, delivery address, email address and telephone numbers.
- **Financial Data** including bank account and payment card details (through our third party payment processor, Windcave).
- **Transaction Data** including details about payments to you from us and from you to us and other details of products and services you have purchased from us or we have purchased from you.
- **Technical and Usage Data** including internet protocol (IP) address, your login data, your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour, information about your access and use of our website, including through the use of Internet cookies, your communications with our website, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider.
- **Profile Data** including your username and password for our Services, profile picture, purchases or orders you have made with us, the date and time you entered and exited our carparks, support requests you have made, content you post, send receive and share through our platform, your interests, preferences, feedback and survey responses.
- **Interaction Data** including information you provide to us when you participate in any interactive features of our Services, including surveys, contests, promotions, activities or events.
- **Marketing and Communications Data** including your preferences in receiving marketing from us and our third parties and your communication preferences.

- Unless otherwise permitted by law, we will not collect sensitive information about you without first obtaining your consent.

How we collect personal information

We collect personal information in a variety of ways, including:

- **Directly:** We collect personal information which you directly provide to us, including when you register for an account on our mobile application, when you park in one of our car parks, when you pay for, or appeal, a breach notice on our website, through the 'contact us' form on our website or when you request our assistance via email, or over the telephone.
- **Indirectly:** We may collect personal information which you indirectly provide to us while interacting with us, such as when you use our mobile application and/or website, in emails, over the telephone and in your online enquiries].
- **From third parties:** We collect personal information from third parties, such as registered owner details from the relevant state or country provider who is authorised to provide such information details of your use of our website from our analytics and cookie providers and marketing providers. See the "Cookies" section below for more detail on the use of cookies.

Why we collect, hold, use and disclose personal information

We have set out below, in a table format, a description of the purposes for which we plan to collect, hold, use and disclose your personal information.

Purpose of use / disclosure	Type of Personal Information
To enable you to access and use our software, including to provide you with a login.	<ul style="list-style-type: none"> • Identity Data • Contact Data
To provide our Services to you, including to allocate a car park space to you, monitor your use of our car parks, issue breach notices, and manage your car park payments and subscriptions.	<ul style="list-style-type: none"> • Identity Data • Contact Data
To contact and communicate with you about our Services including in response to any support requests you lodge with us, a breach notice we have issued to you, or other enquiries you make with us.	<ul style="list-style-type: none"> • Identity Data • Contact Data • Profile Data
To contact and communicate with you about any enquiries you make with us via our website.	<ul style="list-style-type: none"> • Identity Data • Contact Data
For internal record keeping, administrative, invoicing and billing purposes.	<ul style="list-style-type: none"> • Identity Data • Contact Data • Financial Data • Transaction Data
For analytics, market research and business development, including to operate and improve our Services, associated applications and associated social media platforms.	<ul style="list-style-type: none"> • Profile Data • Technical and Usage Data
For advertising and marketing, including to send you promotional information about our events and experiences and information that we consider may be of interest to you.	<ul style="list-style-type: none"> • Identity Data • Contact Data • Technical and Usage Data

	<ul style="list-style-type: none"> • Profile Data • Marketing and Communications Data
To run promotions, competitions and/or offer additional benefits to you.	<ul style="list-style-type: none"> • Identity Data • Contact Data • Profile Data • Interaction Data • Marketing and Communications Data
To comply with our legal obligations or if otherwise required or authorised by law.	<ul style="list-style-type: none"> • Any relevant Personal Information

Our disclosures of personal information to third parties

We may disclose personal information to:

- our employees, contractors and/or related entities;
- IT service providers, data storage, web-hosting and server providers such as AWS;
- professional advisors, bankers, auditors, our insurers and insurance brokers;
- payment systems operators such as Windcave;
- our existing or potential agents or business partners;
- sponsors or promoters of any promotions or competition we run;
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;
- courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights; and
- any other third parties as required or permitted by law, such as where we receive a subpoena.

Overseas disclosure

If you are a user in Australia, we may store personal information overseas, including in, the United States of America. Where we disclose your personal information to the third parties listed above, these third parties may also store, transfer or access personal information outside of Australia, including but not limited to, the United States of America and New Zealand. We will only disclose your personal information overseas in accordance with the Australian Privacy Principles.

If you are a user in New Zealand, where we disclose your personal information to third parties listed above, these third parties may store, transfer or access personal information outside of New Zealand, which may not have an equivalent level of data protection laws as those in New Zealand. Before disclosing any personal information to an overseas recipient, we will comply with Information Privacy Principle 12 and only disclose the information if:

- you have authorised the disclosure after we expressly informed you that the overseas recipient may not be required to protect the personal information in a way that, overall, provides comparable safeguards to those in the Privacy Act 2020;

- we believe the overseas recipient is subject to the Privacy Act 2020;
- we believe that the overseas recipient is subject to privacy laws that, overall, provide comparable safeguards to those in the Privacy Act 2020;
- we believe that the overseas recipient is a participant in a prescribed binding scheme;
- we believe that the overseas recipient is subject to privacy laws in a prescribed country; or

we otherwise believe that the overseas recipient is required to protect your personal information in a way that, overall, provides comparable safeguards to those in the Privacy Act 2020 (for example pursuant to a data transfer agreement entered into between us and the overseas recipient).

Your rights and controlling your personal information

Your choice: Please read this Privacy Policy carefully. If you provide personal information to us, you understand we will collect, hold, use and disclose your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us, however, if you do not, it may affect our ability to provide our Services to you and your use of our Services.

Information from third parties: If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

Restrict and unsubscribe: To object to processing for direct marketing/unsubscribe from our email database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

Access: You may request access to the personal information that we hold about you. An administrative fee may be payable for the provision of such information. Please note, in some situations, we may be legally permitted to withhold access to your personal information. If we cannot provide access to your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal. If we can provide access to your information in another form that still meets your needs, then we will take reasonable steps to give you such access.

Correction: If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to promptly correct any information found to be inaccurate, out of date, incomplete, irrelevant or misleading. Please note, in some situations, we may be legally permitted to not correct your personal information. If we cannot correct your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal.

Complaints: If you wish to make a complaint, please contact us using the details below and provide us with full details of the complaint. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take in response to your complaint.

Storage and security

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures, to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

While we are committed to security, we cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk.

Cookies

We may use cookies on our website from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do recognise you when you return to our online website and allow third parties, such as Google and Facebook, to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. If and when you choose to provide our online website with personal information, this information may be linked to the data stored in the cookie.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

Links to other websites

Our website may contain links to other party's websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

Use of geo-localisation data

We collect your precise or approximate location via our mobile application for the following purposes:

- to enable you to locate an appropriate car park;
- for security and safety;
- to prevent and detect fraud; and
- as permitted by law.

We collect this information when our mobile application is open (whether on-screen or not). If you do not want us to use your location for the purposes above, you should turn off the location services in your account settings in the mobile application or in your mobile phone settings. If you do not provide location information to us, we may not be able to provide our Services to you.

Amendments

We may, at any time and at our discretion, vary this Privacy Policy by publishing the amended Privacy Policy on our website. We recommend you check our website regularly to ensure you are aware of our current Privacy Policy.

For any questions or notices, please contact us at:

Where you are a user based in Australia:

Imperium iQ Pty Ltd (ABN 40648203650)

Email: info@imperiumiq.com

Where you are a user based in New Zealand:

Imperium iQ Ltd (NZBN 9429050761043)

Email: info@imperiumiq.com

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