

SimPPLY Privacy Policy

1. Introduction

JRH Holdings Australia Pty Ltd ("SimPPLY", "we", "us", "our") recognises the importance of your privacy and is committed to protecting any personal information we collect about you in accordance with the National Privacy Principles incorporated into the Privacy Act 1988 (C'th) ("NPPs").

For the purposes of this privacy statement, the word "you" includes website visitors, SimPPLY registered users and purchasers of SimPPLY / Anklesaria training and services.

In this privacy statement, "SimPPLY" means JRH Holdings Australia Pty Ltd (ABN 86 165 684 917) and its related bodies corporate.

The purpose of this privacy statement is to inform you about:

1. What personal information about you is collected by SimPPLY
2. How the information is used
3. With whom the information may be shared
4. How you can access and change any personal information SimPPLY holds about you
5. What security procedures are in place to protect the loss, misuse or alteration of your personal information by SimPPLY
6. How to contact SimPPLY

This privacy statement applies to any personal information you provide to us:

- When visiting the SimPPLY and SimPPLY/Anklesaria event website
- When using SimPPLY's online services
- When entering into an agreement with SimPPLY
- When you correspond, or communicate with SimPPLY over the telephone or in any other manner including by letter, facsimile or email
- Failure by you to provide personal information when requested by SimPPLY may mean that we are unable to provide certain services and products to you.

2. What types of information do we collect?

SimPPLY gathers two types of information about you, namely:

- a. Aggregated information generated by our systems (or third party systems) to track our website traffic but that which does not identify you personally; and

b. Personal information about you such as your name, address, telephone and facsimile number, email address and in some cases, your billing details and general financial and credit information.

The type of information that SimPPLY collects about you is dependent on how you use the services offered on our website and the products and services you are interested in purchasing from SimPPLY.

Generally, SimPPLY does not collect 'sensitive information' about you. Sensitive information includes (but is not limited to) information about your race or ethnic origin, your religion and your sexual preferences. SimPPLY will only collect sensitive information about you in the event that it is necessary for the purpose of providing you with a product or service. In such circumstances, SimPPLY will only collect sensitive information with your consent unless we are required by law to collect such information from you.

Collection of aggregate data

SimPPLY collects information on our site visitors collectively, including which sections of the site are most frequently visited, how often and for how long. This data is always used as aggregated, non-personal information. We utilise this information to improve and enhance our services by monitoring the areas on the site which are most popular to you.

Third Party Measurement

In order to better understand our users, SimPPLY will utilise third party measurement companies, such as Nielsen//NetRatings and Omniture to assess site traffic. Measurement codes and cookies are used to collect the following information on the usage of the site:

- The number of page views (or page impressions) that occur on the SimPPLY site;
- The number of unique visitors to SimPPLY;
- How long these unique visitors (on average) spend on the site when they do visit; and
- Common entry and exit points

This aggregate, non-personal information is collated and provided to SimPPLY to assist in analysing the usage of the site.

Your Internet Provider ("IP") address

SimPPLY's web servers provide us with your IP address. This assists us in the diagnosis of problems and or support issues with our services. Again, information is gathered in aggregate only and cannot be traced to an individual user.

Cookies and Applets

SimPPLY uses 'cookies' and 'applets' in its website systems. These enable you to use services such as the online booking system and finding training course information. You are able to disable cookies and applets via your computer's web browser however this will restrict access to some web pages and services within the SimPPLY website.

3. How we collect information

SimPPLY may collect personal information about you when you visit our website and you elect to use our on-line services, when you submit a course enquiry or course booking, when you enter into a contract with SimPPLY and, when you deal with SimPPLY over the telephone or correspond with SimPPLY via facsimile, letter or email or any other mode of communication.

SimPPLY may also collect personal information about you from our third party service providers.

4. How we use your personal information

Your personal information will be used for two primary purposes. First, it will be used to ensure the proper functioning of SimPPLY products and services to provide the highest level of service for our customers. Secondly, your personal information may be used by SimPPLY for marketing, planning, product development, research, account administration and fraud and crime prevention and investigation.

SimPPLY may use your personal information for one or more of the following purposes or related purposes:

- to communicate with you, including via email newsletters
- to facilitate and process contracts between yourself and SimPPLY and/or third parties
- to verify your identity
- to identify the number of people using SimPPLY's website services and establish the nature of their interests
- to respond to enquiries or feedback
- to research and develop existing and new products and services
- to facilitate SimPPLY registration
- to ensure the proper functioning of SimPPLY services and products

- to conduct SimPPLY marketing activities
- to provide you with information about SimPPLY and its services and products
- where the personal information is to be used by SimPPLY for the purposes described in section 5 of this privacy statement
- when SimPPLY is required or authorised by law to disclose the personal information
- when the individual to which the personal information relates specifically consents in writing to the use or disclosure.

From time-to-time SimPPLY may send e-newsletters and special offers to users who have registered on the website to receive such information and offers. Users who no longer wish to receive this information can unsubscribe from the service by writing to SimPPLY, calling 1800 20 83 20 or by sending an email to info@simply.com.au

5. Disclosure of personal information to third parties

SimPPLY may disclose your personal information to third party contractors who perform services for us including the management and maintenance of our information systems.

SimPPLY may transfer information to persons outside Australia (eg a contractor located in the USA who provides us with services). By giving us your personal information, you consent to such disclosures. In addition, we believe that the recipients of such information are subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the information that are substantially similar to the NPPs.

SimPPLY may also disclose your personal information internally for the purposes of marketing, planning, product development, research, account administration and other related purposes and externally for the purposes of fraud and crime prevention and investigation and other related purposes. To perform these activities, SimPPLY may share your personal information with:

- service providers such as data processing and data analysis agents, printing contractors, customer service organisations, call centres, professional advisors, auditors, delivery companies and mailing organisations
- other organisations as required or authorised by law, for example, to government or regulatory bodies for the prevention or detection of unlawful activities

Where your personal information is passed on to third party contractors, SimPPLY takes reasonable steps to ensure that these individuals and/or organisations are bound by confidentiality and privacy obligations in relation to the protection of your personal information.

Other than as outlined above, SimPPLY will not disclose your personal information without your consent unless disclosure is necessary to prevent a threat to life or health, authorised or required by law, reasonably necessary to enforce the law or necessary to investigate a suspected unlawful activity.

6. Access to and correction of information we hold about you

Upon your request, SimPPLY will provide you with access to your personal information unless there is an exception which applies under the NPPs. If we deny such access, we will tell you why.

SimPPLY may recover any reasonable costs incurred in providing you access to the requested information.

If you are a SimPPLY Registered User, you can access your registered profile at any time.

To request access to your personal information, please contact SimPPLY using one of the contact options provided in section 12 of this privacy statement.

7. Keeping information up to date

SimPPLY strives to ensure that the information we hold about you is accurate, complete and up-to-date at all times.

If the personal information we hold about you is inaccurate, incomplete, or no longer up-to-date, or you wish for your details to be removed, please contact SimPPLY at info@simpply.com.au so that we may take reasonable steps to address this and/or discuss alternative options with you.

8. Storage and security of your personal information

SimPPLY takes reasonable steps to protect the security of your personal information in accordance with this privacy statement.

SimPPLY regularly reviews and implements new security and encryption technologies. Unfortunately, no data transmission over the internet can be guaranteed to be totally secure.

While SimPPLY strives to protect such information, we cannot ensure or warrant to

you that the security of any information you transmit to us or obtain from our online products or services. Accordingly, use is at your own risk.

Once any personal information comes into our possession, we will take reasonable steps to protect that information from misuse and loss and from unauthorised access, modification or disclosure.

9. Links to other websites

The SimPPLY website contains links to other websites. Please note that these links are intended for your convenience only.

Links to third party websites do not constitute endorsement, sponsorship or approval by SimPPLY of the content, policies or practices of those third party websites.

If you have any concerns regarding your privacy when visiting a linked third party, you should ensure that you check the privacy statement/policies of those websites.

10. Destruction of your personal information

SimPPLY will take reasonable steps to destroy or de-identify any personal information about you once the information is no longer required for the purposes for which it was collected or as authorised or required by law.

11. Changes to SimPPLY's privacy statement

From time to time, SimPPLY may make changes to this privacy statement. Accordingly, we encourage you to periodically review this statement to remain informed about how we collect and protect your personal information.

Your continued use of the SimPPLY website constitutes your acceptance of the collection, use and disclosure of your personal information to the extent outlined in this privacy statement as amended from time to time.

For further information about the protection of your privacy, please visit the Australian Federal Privacy Commissioner's website at www.privacy.gov.au.

12. Feedback and questions about privacy and the SimPPLY website

SimPPLY welcomes ideas and feedback about all aspects of the SimPPLY website. This feedback may be used to administer and refine the services we provide and may be shared with SimPPLY partners either in aggregate form or with specific identifying characteristics removed.

If you have any questions regarding this privacy statement, practices of the SimPPLY website or your dealings with SimPPLY, you can contact us in the following ways:

Email: info@simpply.com.au

Telephone: 1800 20 83 20 (from within Australia)

Post: Operations Manager
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50 Clarence Street
Sydney
NSW 2000