

NUMERO PRIVACY POLICY

Numero (Aust) Pty Limited (“Numero” “we” “us” or “our”), a company incorporated in Australia having its registered office at Studio, Level 2, 21 Shepherd Street, Chippendale NSW 2008, Sydney, Australia is responsible for your personal information in our systems and we take our data protection and privacy responsibilities seriously.

This privacy policy explains how we collect, use and share personal information in relation to our website [numero.co](https://www.numero.co) and in the course of our business activities, including:

[What personal information we collect](#)

[How we share personal information](#)

[Marketing](#)

[Transferring personal information globally](#)

[How we protect and store personal information](#)

[Cookies](#)

[Legal rights available to help manage your privacy](#)

[How you can contact us for more support](#)

Updates

We may amend this privacy policy from time to time to keep it up to date with legal requirements and the way we operate our business, and we will place any updates on this webpage. This privacy policy was last updated on 23 July 2019. Please regularly check these pages for the latest version of this notice. If we make fundamental changes to this privacy policy, we will seek to inform you by notice on our website or email.

Third Party Websites

You might find external links to third party websites on our website. This privacy policy does not apply to your use of a third party site

WHAT PERSONAL INFORMATION WE COLLECT

When we collect information

We collect information about you if you register with or use our website or services, work with us as a business partner, register or attend an event organised or hosted by us, apply for a job with us, subscribe to our newsletter or other forms of marketing communications, respond to a survey or fill out a form created or sent by us, or if you otherwise contact us (together, “**Services**”).

We may also collect personal information from third parties, such as your employer, public databases or websites.

Personal information we collect from you and use if you use our website or Services

- **Contact information** – such as your title, name, email address, phone number, business address. We use this information to operate, maintain and provide the Services to you. We also use this information to communicate with you, including sending service-related communications, employment-related communications and marketing communications in accordance with your preferences.
- **Location information** – other than information you choose to provide us, we do not collect information about your precise location. Your device’s IP address may help us determine an approximate location to ensure content made available to you through our Services or marketing channels is relevant to the city or country you are using your device in.
- **Troubleshooting information** – should you require assistance from our Services Team in relation to issues with our Services, website, your account etc, we may require your personal details in order to address the issue, such as your user name and user ID.
- **Preferences** – such as preferences set for notifications, marketing communications and how our website is displayed. We use this information to provide notifications, send news and marketing communications and provide our Services in accordance with your choices and also to ensure that we comply with our legal obligation to send only those marketing communications to which you have consented.
- **Information provided by third parties** - from time to time, we may receive information about you from third parties and other users. We may obtain information from third parties to enhance or supplement our existing user information. We may also collect information about you that is publicly available.

We will use the personal information we collect to operate, maintain and provide to you the features and functionality of the Services, to communicate with you, to monitor and improve the Services and business, and to help us develop new products and services.

Legal basis for using your personal information

We will only collect, use and share your personal information where we are satisfied that we have an appropriate legal basis to do this (namely, that the processing is necessary for our legitimate interests and/or for compliance with a legal obligation to which we are subject). This is because:

- we need to use your personal information to perform a contract or take steps to enter into a contract with you;
- we need to use your personal information for our legitimate interest as a commercial organisation. For example, we may use your email address to send you information about product updates. In all such cases, we will look after your information always in a way that is proportionate and respects your privacy rights and you have a right to object to processing as explained in the [Legal Rights section](#) below;
- we need to use your personal information to comply with a relevant legal or regulatory obligation that we have; or
- we have your consent to use your personal information for a particular activity.

If you would like to find out more about the legal basis for which we process personal information, please [contact us](#).

HOW WE SHARE PERSONAL INFORMATION

We share your personal information in the manner and for the purposes described below:

- as Numero is a subsidiary of Vista Group International Limited ("**Vista Group**"), with other companies within the Vista Group, where such disclosure is necessary to provide you with our products and services or to manage our business. [Click here](#) for a list of the other companies within the Vista Group;
- with third parties who help manage our business and deliver services. These third parties have agreed to confidentiality restrictions and to use any personal information we share with them or which they collect on our behalf solely for the purpose of providing the contracted service to us. These include IT service providers who help manage our IT systems;
- with government organisations and agencies, law enforcement and regulators, to comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies;

If, in the future, we sell or transfer some or all of our business or assets to a third party, we may disclose information to a potential or actual third party purchaser of our business or assets.

DIRECT MARKETING

How we use personal information to keep you up to date with our products and services

We may use personal information to let you know about our products and services that we believe will be of interest to you. We may contact you by email, post, or telephone or through other communication channels that we think you may find helpful. In all cases, we will respect your preferences for how you would like us to manage marketing activity with you.

How you can manage your marketing preferences

To protect your privacy rights and to ensure you have control over how we manage marketing with you:

- we will take steps to limit direct marketing to a reasonable and proportionate level and only send you communications which we believe may be of interest or relevance to you;
- you can ask us to stop direct marketing at any time - you can ask us to stop sending email marketing, by following the "unsubscribe" link you will find on all the email marketing messages we send you. Alternatively, you can contact us at admin@numero.co and specify whether you would like us to stop all forms of marketing or just a particular type (e.g. email); and
- you can change the way your browser manages cookies by following the settings on your browser as explained in our [Cookie Policy](#).

We recommend you routinely review the privacy policies and preference settings that are available to you on any social media platforms as well as your preferences within your account with us.

When and how we undertake profiling and analytics

We use performance cookies like Google Analytics to recognise and count the number of visitors/users of our website and to see how such visitors/users move around our website when they are using it.

For more information about how we use profiling and analytics, please visit our [Cookie Policy](#).

TRANSFERRING PERSONAL INFORMATION GLOBALLY

We operate on a global basis. Accordingly, your personal information may be transferred and stored in countries outside the EU, including Australia, New Zealand and the United States of America, that are subject to different standards of data protection.

We will take appropriate steps to ensure that transfers of personal information are in accordance with applicable law and carefully managed to protect your privacy rights and interests and transfers are limited to countries which are recognized as providing an adequate level of legal protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights. To this end:

- we ensure transfers within the Vista Group companies will be covered by an agreement entered into by the Vista Group companies (an intragroup agreement) which contractually obliges each member to ensure that personal information receives an adequate and consistent level of protection wherever it is transferred within the Vista Group companies;

- where we transfer your personal information outside the Vista Group companies or to third parties who help provide our products and services, we obtain contractual commitments from them to protect your personal information. Some of these assurances are well recognized certification schemes like the EU US Privacy Shield for the protection of personal information transferred from within the EU to the United States; or
- where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any personal information is disclosed.

You have a right to [contact us](#) for more information about the safeguards we have put in place (including a copy of relevant contractual commitments) to ensure the adequate protection of your personal information when this is transferred as mentioned above.

HOW WE PROTECT AND STORE YOUR INFORMATION

Security

We have implemented and maintain appropriate technical and organisational security measures, policies and procedures designed to reduce the risk of accidental destruction or loss, or unauthorised disclosure or access to such information appropriate to the nature of the information concerned.

Measures we take include:

- placing confidentiality requirements on our employees and service providers;
- ensuring that only authorised devices and authorised relevant employees with a work-related need for data processing have access to personal information;
- when an employee leaves Numero, ensuring they do not have access to, or take with them, any personal information. Numero will ensure that no previous employees or external consultants have access rights to the Numero systems holding personal information;
- destroying or permanently anonymising personal information if it is no longer needed for the purposes for which it was collected;
- following strict security procedures in the storage and disclosure of your personal information to prevent unauthorised access to it;
- keeping our networks and systems up to date with regard to new versions, updates and patches on an ongoing basis;
- using secure/encrypted transfer of personal information on the internet;
- ensuring appropriate physical security of personal information, including:
 - fitting appropriate locks or other physical controls to the doors and windows of rooms where computers are kept;
 - destroying or removing all personal information from media and hard drives of any computers before disposing of them
- implementing best practice access controls, including:

- that best practise password procedures must be in place, including using strong passwords; and
- having industry standard hard drive encryption for internal or external hard drives; and
- protecting our networks, systems and logs against tampering;
- using secure communication transmission software (known as "secure sockets layer" or "SSL") that encrypts all information you input on our website before it is sent to us. SSL is an industry standard encryption protocol, which ensures that the information is reasonably protected against unauthorized interception; and
- monitoring and keeping up to date with all security measures, processes and risk analyses.

As the security of information depends in part on the security of the computer you use to communicate with us and the security you use to protect User IDs and passwords, please take appropriate measures to protect this information.

Storing your personal information

We will store your personal information for as long as is reasonably necessary for the purposes for which it was collected, as explained in this privacy policy.

You may request that all information that is no longer needed may be disposed of in a secure manner within 20 business days. In some circumstances we may store your personal information for longer periods of time, for instance where we are required to do so in accordance with legal, regulatory, tax and/or accounting requirements.

In specific circumstances we may store your personal information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

COOKIES

A cookie is a small text file containing small amounts of information which is downloaded to / stored on your computer (or other internet enabled devices, such as a smartphone or tablet) when you visit a website.

Cookies may collect personal information about you. Cookies help us remember information about your visit to our website, like your country, language and other settings. Cookies allow us to understand who has seen which web pages, to determine how frequently particular pages are visited and to determine the most popular areas of our website. They can also help us to operate our website more efficiently and make your next visit easier. Cookies can allow us to do various other things, as explained further in our Cookie Policy which you can access by clicking on the link below.

For more information about the types of cookies we use, how they work and information about how to manage your cookie settings, please visit our [Cookie Policy](#).

LEGAL RIGHTS AVAILABLE TO HELP MANAGE YOUR PRIVACY

Subject to certain exemptions, and in some cases dependent upon the processing activity we are undertaking and where your personal information originates from, you have certain rights in relation to your personal information. If you are resident in the European Economic Area, under European law you have the following rights in respect of your personal information:

- [Access personal information](#)
- [Rectify / erase personal information](#)
- [Restrict the processing of your personal information](#)
- [Transfer your personal information](#)
- [Object to the processing of personal information](#)
- [Object to how we use your personal information for direct marketing purposes](#)
- [Obtain a copy of personal information safeguards used for transfers outside your jurisdiction](#)
- [Lodge a complaint with your local supervisory authority](#)

If you wish to access any of the above rights, we may ask you for additional information to confirm your identity and for security purposes, in particular before disclosing personal information to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

You can exercise your rights by contacting us at admin@numero.co. Subject to legal and other permissible considerations, we will make every reasonable effort to honour your request promptly or inform you if we require further information in order to fulfil your request.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

Residents in other jurisdictions may also have similar rights to the above. Please contact us at admin@numero.co if you would like to exercise one of these rights, and we will comply with any request to the extent required under applicable law.

Right to access personal information

You have a right to request that we provide you with a copy of your personal information that we hold, and you have the right to be informed of; (a) the source of your personal information; (b) the purposes, legal basis and methods of processing; (c) the data controller's identity; and (d) the entities or categories of entity to whom your personal information may be transferred.

Right to rectify or erase personal information

You have a right to request that we rectify inaccurate personal information. We may seek to verify the accuracy of the personal information before rectifying it.

You can also request that we erase your personal information in limited circumstances where:

- it is no longer needed for the purposes for which it was collected; or
- you have withdrawn your consent (where the data processing was based on consent); or
- following a successful right to object (see [right to object](#)); or
- it has been processed unlawfully; or
- to comply with a legal obligation to which Numero is subject.

We are not required to comply with your request to erase personal information if the processing of your personal information is necessary:

- for compliance with a legal obligation; or
- for the establishment, exercise or defence of legal claims;

Right to restrict the processing of your personal information

You can ask us to restrict your personal information, but only where:

- its accuracy is contested, to allow us to verify its accuracy; or
- the processing is unlawful, but you do not want it erased; or
- it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
- you have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal information following a request for restriction, where:

- we have your consent; or
- to establish, exercise or defend legal claims; or
- to protect the rights of another natural or legal person.

Right to transfer your personal information

You can ask us to provide your personal information to you in a structured, commonly used, machine readable format, or you can ask to have it transferred directly to another data controller, but in each case only where:

- the processing is based on your consent or on the performance of a contract with you; and
- the processing is carried out by automated means.

Right to object to the processing of your personal information

You can object to any processing of your personal information which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests.

If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

Right to object to how we use your personal information for direct marketing purposes

You can request that we change the manner in which we contact you for marketing purposes.

You can request that we do not transfer your personal information to unaffiliated third parties.

Right to obtain a copy of personal information safeguards used for transfers outside your jurisdiction

You can ask to obtain a copy of, or reference to, the safeguards under which your personal information is transferred outside of the European Union.

We may redact data transfer agreements to protect commercial terms.

Right to lodge a complaint with your local supervisory authority

You have a right to lodge a complaint with your local supervisory authority if you have concerns about how we are processing your personal information.

We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.

CONTACT US

The primary point of contact for all issues arising from this privacy policy is our administrator team. They can be contacted electronically by emailing admin@numero.co or by post to Numero (Aust) Pty Ltd, Studio, Level 2, 21 Shepherd Street, Chippendale NSW 2008, Sydney, Australia.

If you have any questions, concerns or complaints regarding our compliance with this privacy policy, the information we hold about you or if you wish to exercise your rights, we encourage you to first contact Numero. We will investigate and attempt to resolve complaints and disputes and make every reasonable effort to honour your wish to exercise your rights as quickly as possible and, in any event, within the timescales provided by applicable data protection laws.

To contact your data protection supervisory authority

You have a right to lodge a complaint with your local data protection supervisory authority (i.e. your place of habitual residence, place of work or place of alleged infringement) at any time. We ask that you please attempt to resolve any issues with us before your local supervisory authority.

Issue date of Privacy Policy: 23 July 2019.