



## Privacy Policy

InnerOrigin Australia Pty Ltd ABN 68 615 375 776 (**InnerOrigin, We** or **Our**) collects and manages personal information provided through the InnerOrigin website (the **Website**) in accordance with the *Australian Privacy Principles* (**Principles**) contained in the *Privacy Act 1988* (Cth) (**Privacy Act**) and this Privacy Policy.

By using the Website or the InnerOrigin Mobile Smart Application (the **App**), you agree and consent to the collection, use, holding and disclosure of personal information by InnerOrigin as set out in this Privacy Policy.

### 1. Personal Information

Personal information is information or an opinion about an individual whose identity is apparent, or can be reasonably ascertained, from that information or opinion.

### 2. Collection of Personal Information

We will collect personal information only by lawful and fair means and not in an unreasonable or intrusive way. We will not collect personal information unless the information is reasonably necessary for Our functions and activities.

We will collect personal information, such as your name, gender, date of birth, postal address, telephone number, email address, purchase details and credit and debit card numbers, from you when you provide information direct to InnerOrigin, including when setting up an account with InnerOrigin or when purchasing products or services (**Products**) provided by InnerOrigin's third party suppliers (**Merchant Partners**) on the Website or the App.

We may also collect your personal information from a person approved by InnerOrigin to promote Products listed on the Website and the App (**InnerOrigin Advocate**) where the InnerOrigin Advocate notifies you, at the time of collection, that your personal information will be provided to InnerOrigin.

If you choose not to provide us with your personal information or if you use a pseudonym or do not provide identifiable information, we may not be able to provide you with the Products you require.

### 3. How Personal Information is Held

InnerOrigin will store your personal information in a secure environment. It is protected by a combination of physical and technological measures. We have taken reasonable steps to protect your data from loss, misuse, unauthorised access or disclosure, alteration or destruction. If you want more information about the way we manage the information we hold, please contact us as we would be happy to provide you with further information on our processes.

### 4. How Personal Information is Used

We may use your personal information for any of the following purposes:

- a. the purposes for which you specifically provided your personal information including, without limitation, to enable InnerOrigin to respond to your enquiries or comments that you submit to us and to complete and fulfil your purchases of Products;
- b. to allow you to use the Website and the App, and communicate and interact with others on the Website;
- c. to send you information about your relationship or transactions with InnerOrigin;
- d. to tell you about products, services, programs and offers that InnerOrigin believes may be of interest to you (if you have not opted-out of receiving such communications);
- e. to help you find an InnerOrigin Advocate;
- f. for Our internal business and management purposes including, without limitation, data analysis, audits, enhancing the Website, improving services, identifying usage trends and determining the effectiveness of marketing campaigns;
- g. to train Our employees, agents and InnerOrigin Advocates;
- h. any other purpose you have consented to;
- i. any use which is required or authorised by law; and
- j. to handle complaints and disputes and to detect, investigate and prevent fraud.

## **5. Direct Marketing**

We will not direct market to you unless you have been given an opportunity to opt out of receiving future direct marketing communications or unless you have otherwise consented to direct marketing. If you do not want to receive such offers from InnerOrigin, or do not want InnerOrigin to disclose your personal information to our related entities, service providers or third parties for marketing purposes, you can opt out at any time by selecting the unsubscribe option on any email sent to you by InnerOrigin, by selecting the unsubscribe button on the Website or the App or by contacting us using our contact details provided below.

## **6. Website Cookies**

We may collect cookies about your visit to the Website to help us to improve the Website. Cookies are small information files which are sent to your computer's hard drive or mobile device when you visit a website and it will recognise your device on future visits. For example, we may collect the time of your visit, whether you have visited our Website previously, whether you used a search engine to find us and some geographical information. For information on disabling these cookies, please go to the privacy settings section within your browser.

We may also use analytical web tools to collect visitor information for us to better understand how to improve our products and services to you. I

We also use other external service providers for the following purposes:

- a. for web hosting services for the Website; and/or
- b. to gather non-personal information (using cookies) in order to evaluate the website's effectiveness, for example online marketing activities.

## **7. How Personal Information is Disclosed**

InnerOrigin may share your personal information with third parties including (without limitation) as follows:

- a. to companies affiliated with InnerOrigin;
- b. to suppliers of Products;
- c. to InnerOrigin's local and offshore third party service providers who provide services on InnerOrigin's behalf including (without limitation) delivering the Products, website hosting, data analysis, payment management services and training;
- d. to a third party in the event of any reorganisation, merger, sale, assignment, transfer or other disposition of all or any portion of our business, assets or stock;
- e. to any person or entity to whom you have consented to InnerOrigin disclosing your personal information to; and
- f. any person or entity to whom We are required or authorised to disclose your personal information to in accordance with the law.

Those entities are not authorised by us to use personal information for anything other than the purpose for which we supply that information to them. We may also disclose personal information where you consent to us doing so. That consent may be written, verbal or implied from your conduct.

## **8. Overseas Disclosure of Personal Information**

Our related entities and some of our service providers (including information technology service providers) may be located overseas and, as a result, personal information collected and held by InnerOrigin may be transferred overseas. The countries in which these recipients may be located will vary from time to time, but it is currently envisaged it will include the United States of America.

We will take such steps as are reasonable in the circumstances to ensure that the information that is transferred to third parties located outside of Australia will not be held, used or disclosed by the recipient of the information in a manner that is inconsistent with the Principles.

## **9. Accuracy of Information**

InnerOrigin takes reasonable precautions to ensure that the personal information We collect, use and disclose is accurate, complete and up-to-date. However, the accuracy of that information depends to a large extent on the information you provide. We recommend that you:

- a. let InnerOrigin know if there are any errors in your personal information; and
- b. keep InnerOrigin up to date with changes to your personal information such as your name, email and postal address.

You are able to view the personal information InnerOrigin holds about you via the My Account Section of the Website. You can amend such information via the My Account Section of the Website. InnerOrigin will take all reasonable steps to correct your personal information, within fourteen (14) days.

If We no longer need your personal information for any the purposes permitted by this Privacy Policy, or as otherwise required by law, We will take such steps as are reasonable in the circumstances to destroy the information or to de-identify it.

## **10. Complaints**

You have a right to complain about InnerOrigin's handling of your personal information if you believe there has been a breach of your privacy.

If you believe that We have interfered with your privacy in our handling of your personal information, you may lodge a complaint to InnerOrigin's Compliance Officer by emailing [compliance@innerorigin.com](mailto:compliance@innerorigin.com) or by mail at PO Box 1211, Crows Nest NSW 1585.

You will need to provide InnerOrigin with details of your complaint and any supporting evidence and/or information. We will acknowledgement receipt of your written complaint no later than five (5) business days after receipt.

We will investigate your complaint in accordance with our internal complaints resolution process and determine the steps (if any) that we will undertake to resolve your complaint. We will contact you if we require any additional information from you. You will be sent the final decision in writing no later than fifteen (15) business days after you contact us, if we have all the necessary information to make that decision.

If you disagree with our decision, you may refer your complaint to the Office of the Australian Information Commissioner by visiting [www.oaic.gov.au](http://www.oaic.gov.au), calling 1300 363 992 or emailing [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au).

## **11. Limitation of Liability**

Before transmitting personal information from your computer to the Website please be aware that the transmission of information over the Internet is not always completely secure or error-free. Other than liability that cannot lawfully be excluded, InnerOrigin will not be liable in any way in relation to any breach of security or any unintended loss or disclosure of that information.

## **12. Amending this Privacy Policy**

InnerOrigin reserves the right to amend or change this Privacy Policy from time to time for any reason and without notice, and changes will be effective immediately upon posting the amended Privacy Policy on the Website and/or the App.

## **13. Governing Law**

The law of New South Wales from time to time governs this Privacy Policy. The parties agree to the non-exclusive jurisdiction of the courts of New South Wales, the Federal Court of Australia, and courts entitled to hear appeals from those courts.

## **14. Contact Information**

If you have any questions about this Privacy Policy, or concerns about the management of your personal information, please contact InnerOrigin on 1300 983 987 or at [info@innerorigin.com](mailto:info@innerorigin.com).