

# MICROMELON ROBOTICS

## PRIVACY POLICY

### 1. INTRODUCTION

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- 1.1 Micromelon Pty Ltd ACN 623 302 296 trading as Micromelon Robotics (**Micromelon Robotics**, 'our', 'us', or 'we') is a robotic education company. Micromelon Robotics offers products and programs to its customers that aid in teaching a range of skills to children such as programming and robotics, as well as engineering consulting services (**goods and services**).
- 1.2 In the course of our business in Australia, we collect personal information. This privacy policy has been developed to ensure that such information is handled appropriately.
- 1.3 We are committed to complying with the *Privacy Act 1988* (Cth) (**Privacy Act**) in relation to all personal information we collect. Our commitment is demonstrated in this policy. The Privacy Act incorporates the Australian Privacy Principles (**APPs**). The APPs set out the way that personal information must be treated.

#### Who does the privacy policy apply to?

- 1.4 This policy applies to any person in relation to whom we currently hold, or may in the future collect, personal information.

#### What information does the privacy policy apply to?

- 1.5 This policy applies to personal information. In broad terms, 'personal information' is information or opinions relating to a particular individual who can be identified.
- 1.6 Information is not personal information where the information cannot be linked to an identifiable individual.

### 2. HOW DO WE MANAGE THE PERSONAL INFORMATION WE COLLECT?

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- 2.1 We manage the personal information we collect in numerous ways, such as by:
- (a) implementing procedures for identifying and managing privacy risks;
  - (b) implementing security systems for protecting personal information from misuse, interference and loss from unauthorised access, modification or disclosure;
  - (c) providing staff with training on privacy issues;
  - (d) appropriately supervising staff who regularly handle personal information;
  - (e) implementing mechanisms to ensure any service providers who deal with us comply with the APPs;
  - (f) implementing procedures for identifying and reporting privacy breaches and for receiving and responding to complaints; and
  - (g) appointing a privacy officer within the business to monitor privacy compliance.
- 2.2 We will take reasonable steps to destroy or de-identify personal information if that information is no longer needed for the purposes for which we are authorised to use it.

- 2.3 If you want to use a pseudonym or remain anonymous when dealing with us, you should notify us and we will try to accommodate your request, subject to our ability to provide you with our services.

### **3. WHAT KINDS OF INFORMATION DO WE COLLECT AND HOLD?**

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- 3.1 We may collect and hold personal information about you, which may include:
- (a) your contact details such as your email address, first and last name; and
  - (b) any other personal information required to provide the goods and services to you.
- 3.2 Where an individual does not have capacity to consent to or provide personal information, a representative as detailed below can act on the individual's behalf;
- (a) a guardian/parent (parent);
  - (b) someone with an enduring power of attorney;
  - (c) a person recognised by other laws as a responsible person such as carer, family member; and
  - (d) a person nominated in writing by the individual.
- 3.3 We do not collect sensitive information about individuals (see below).

#### **Sensitive information**

- 3.4 'Sensitive information' is a subset of personal information and includes personal information that may have serious ramifications for the individual concerned if used inappropriately.
- 3.5 We will not collect sensitive information without the individual's consent to whom the information relates unless permitted under the Privacy Act.

### **4. HOW AND WHEN DO WE COLLECT PERSONAL INFORMATION?**

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- 4.1 Our usual approach to collecting personal information is to collect it directly from the individual concerned.
- 4.2 Your personal information may be collected from you when you:
- (a) create an account or interact with us using our program, website or mobile application;
  - (b) make a purchase;
  - (c) sign up for our newsletter;
  - (d) from our own records of your dealings with us;
  - (e) respond to a survey or marketing communication; or
  - (f) use certain other site or mobile application features.
- 4.3 We may also collect personal information in other ways, such as from:
- (a) our related entities; and
  - (b) our service providers and agents;

## **5. HOW DO WE HOLD PERSONAL INFORMATION?**

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- 5.1 Our usual approach to holding personal information includes holding that personal information:
- (a) physically, at our premises; and
  - (b) electronically, by a third party data storage provider;
- 5.2 We secure the personal information we hold in numerous ways, including:
- (a) using secure servers to store personal information;
  - (b) using unique usernames, passwords and other protections on systems that can access personal information; and
  - (c) holding certain sensitive documents securely.

## **6. WHY DO WE COLLECT, HOLD, USE OR DISCLOSE PERSONAL INFORMATION?**

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- 6.1 We take reasonable steps to use and disclose personal information for the primary purpose for which we collect it. The primary purpose for which information is to provide you with our goods and services.
- 6.2 Personal information may also be used or disclosed by us for secondary purposes that are within an individual's reasonable expectations and that are related to the primary purpose of collection.
- 6.3 We may collect, hold and use your personal information:
- (a) to improve our website and mobile application in order to enhance our relationship with you;
  - (b) to fulfil your order for goods and services;
  - (c) perform any contract entered into;
  - (d) to keep records of transactions to assist in future enquiries and enhance our relationship with you;
  - (e) to send you special offers in relation to our goods and services; and
  - (f) for payment purposes; and
  - (g) to ensure compliance with legislative and regulatory requirements.
- 6.4 We may disclose personal information to:
- (a) our employees, related body corporates or service providers including third party technology providers we engage from time to time, such as our data storage providers and email filter providers;
  - (b) fulfilling requests by you, and to otherwise provide goods and services to you including, without limitation web hosting providers, IT systems administrators, mailing houses, payment processors, and couriers;
  - (c) financial institutions, suppliers, insurers and other third parties with whom we have commercial relationships, for business, marketing and related purposes; and
  - (d) any organisation for any authorised purpose with your express consent.
- 6.5 Otherwise, we will only disclose personal information to third parties if permitted by the Privacy Act.

## **7. DIRECT MARKETING MATERIALS**

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- 7.1 We may send you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail and email, in accordance with applicable marketing laws, such as the Spam Act 2003 (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.
- 7.2 Before using any sensitive information for the purpose of direct marketing, we will seek your consent to use or disclose the information.
- 7.3 In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see details below), or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list.

## **8. WEBSITE ANALYTICS**

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- 8.1 Our website uses Google Analytics, a service which tracks and reports website traffic data to Google servers in the United States. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand website traffic, and webpage usage to improve our performance, marketing and products.
- 8.2 By using this website, you consent to the processing of data about you by Google in the manner described in Google's Privacy Policy and for the purposes set out above. You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or use the opt-out service provided by Google.

## **9. WILL WE DISCLOSE PERSONAL INFORMATION OUTSIDE AUSTRALIA?**

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- 9.1 We generally do not disclose personal information outside of Australia. However, we may use services from time to time to manage and improve our Goods and Services and the third party service providers we engaged may be located, or have their IT services, located overseas.
- 9.2 We may also utilise a cloud or other outsourced IT services which may result in personal information being stored overseas.
- 9.3 Your personal information will not be disclosed to overseas recipients unless we are satisfied that the recipient is subject to privacy protection laws that offer substantially similar levels of protection as those required under the Australian Privacy Principles or if we have taken reasonable steps to ensure this personal information is handled in a safe and secure manner and that overseas entity is aware of the obligations relating to the information under the APPs.

## **10. HOW DO YOU MAKE COMPLAINTS OR ACCESS AND CORRECT YOUR PERSONAL INFORMATION?**

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- 10.1 It is important that the information we hold about you is up-to-date. You should contact us if your personal information changes.

### **Access to information and correcting personal information**

- 10.2 You may request access to the personal information held by us or ask us for your personal information to be corrected by using the contact details in this section.
- 10.3 We will grant you access to your personal information as soon as possible, subject to the request circumstances.
- 10.4 In keeping with our commitment to protect the privacy of personal information, we may not disclose personal information to you without proof of identity.

10.5 We may deny access to personal information if:

- (a) the request is unreasonable;
- (b) providing access would have an unreasonable impact on the privacy of another person;
- (c) providing access would pose a serious and imminent threat to the life or health of any person; or
- (d) there are other legal grounds to deny the request.

10.6 We may charge a fee for reasonable costs incurred in responding to an access request. The fee (if any) will be disclosed before it is levied.

10.7 If the personal information we hold is not accurate, complete and up-to-date, we will take reasonable steps to correct it so that it is accurate, complete and up-to-date, where it is appropriate to do so.

### **Complaints**

10.8 If you want to complain about an interference with your privacy, you must follow the following process:

- (a) The complaint must first be made to us in writing, using the contact details in this section. We will have a reasonable time to respond to the complaint.
- (b) If the privacy issue cannot be resolved, you may take your complaint to the Office of the Australian Information Commissioner.

### **Who to contact**

10.9 A person may make a complaint or request to access or correct personal information about them held by us. Such a request must be made in writing to the following address:

**Privacy Officer:** Adam Stacey

**Email address:** adam@micromelon.com.au

## **11. CHANGES TO THE POLICY**

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11.1 We may update, modify or remove this policy at any time without prior notice. Any changes to the privacy policy will be published on our website.

11.2 This policy is effective from January 2020. If you have any comments on the policy, please contact our privacy officer using the contact details in section 10 of this policy.

# MICROMELON ROBOTICS

## COLLECTION STATEMENT

Micromelon Pty Ltd ACN 623 302 296 trading as Micromelon Robotics (**Micromelon Robotics**) is committed to protecting the privacy of your personal information. You can access our full privacy policy on our website at [www.micromelon.com.au](http://www.micromelon.com.au).

Our primary purpose for collecting, using, holding and disclosing information from you is generally to provide you with our goods and services. We may also use or disclose your personal information for reasonable secondary purposes such as to:

- to improve our website and mobile application in order to enhance our relationship with you;
- to fulfil your order for goods and services;
- perform any contract entered into;
- to keep records of transactions to assist in future enquiries and enhance our relationship with you;
- to send you special offers in relation to our goods and services;
- for payment purposes; and
- to ensure compliance with legislative and regulatory requirements.

Our usual process of collecting personal information is to collect the personal information directly from the individual concerned. Personal information may also be collected by way of electronic and hard copy order forms. We may also collect personal information in other ways, however we will generally only collect the personal information from other sources if it is necessary to provide you with our goods and services.

If you do not provide us with your personal information, we may not be able to transact with you, or provide you with our goods and services.

We do not usually disclose your personal information to other entities, unless it is necessary to provide you with our goods and services or you have requested or authorised us to disclose the information to another entity. For example, we may disclose your personal information to any third-party contractors we engage to assist us in providing goods and services to you.

We do not generally disclose your personal information to overseas recipients.

Our detailed privacy policy includes further information on how you can access and seek correction of your personal information and how you can complain about a breach of your privacy. The policy also contains information about how we will deal with a complaint. If you have any concerns about the privacy of your personal information, please contact our Privacy Officer Adam Stacey by email at [adam@micromelon.com.au](mailto:adam@micromelon.com.au).