

In this privacy policy, the expressions "Direct Commercial Property (DCP)", "we", "us" and "our" are a reference to DCP Syndication Pty Ltd ABN 55 129 528 301.

This privacy policy applies to personal information collected by us. We are bound by the National Privacy Principles, which govern the way private sector organisations collect, use, keep secure and disclose personal information.

If you have any concerns about the manner in which your personal information has been collected, used or disclosed by us, we have put in place an effective mechanism and procedure for you to contact us so that we can attempt to resolve the issue. We can be contacted by phone at 1300 965 232 and our privacy officer will then attempt to resolve the issue.

We recommend that you keep this information for future reference.

1. What is personal information?

The Privacy Act 1988 (Cth) defines "personal information" to mean information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent or can be reasonably ascertained, from the information or opinion.

2. What is Sensitive Information? 2.1 Sensitive information is a subset of personal information. It means information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political organisation, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices or health information about an individual.

2.2 In general, we limit the collection of sensitive information. However, exempt sensitive personal information may be collected by us, and you consent and agree (and agree to procure all necessary consent and further agreement) to the collection of such information. Exempt sensitive personal information is sensitive information that you provide to us as a necessary part of us providing certain services to you. For example, if we provide hosting services to you, and some of the data you (or your customers or users) provide via a hosted platform constitutes sensitive information, then we naturally need to collect such information in order to provide those services to you.

3. Collection of your personal information

3.1 We only collect personal information that is necessary for what we do. The type of information we may collect from you includes (but is not limited to) the following: (a) your contact information (both home and work) such as full name (first and last), organisation (if applicable), e-mail address, current postal address and phone numbers;

(b) your date of birth;

(c) your employment or potential employment with us;

(d) your insurance policies and details;

(e) your opinions via surveys and questionnaires;

(f) if you are requesting products or services from us or we are purchasing goods or services from you, then any relevant payment or billing information (including bank account details, credit card details, billing address and account code or number);

(g) your credit history (including reports containing information about your commercial activities or commercial credit worthiness from a business which provides information about the commercial credit worthiness of a person or an entity in relation to credit provided by us);

(h) your username and password when setting up an account or for the members section of our website or your website;

(i) any information collected from you in connection with hosting services we provide to you; and

(j) any information collected from you in connection with website design and development services we provide to you.

3.2 As much as possible, we will collect your information directly from you. If we collect details about you from someone else, we will, whenever reasonably possible, make you aware that we have done this and why.

3.3 When you engage in certain activities, such as purchasing a product, signing up for a service, entering a contest or promotion, filling out a survey or sending us feedback, we may ask you to provide certain information. It is completely optional for you to engage in these activities.

3.4 Depending upon the activity, some of the information we ask you to provide may be identified as mandatory or voluntary. If you do not provide the mandatory data with respect to a particular activity, or any other information we require in order for you will not be able to engage in that activity.

3.5 We may utilise “cookies” which enable us to monitor traffic patterns and to serve you more efficiently if you revisit the site. A cookie does not identify you personally but it does identify your computer. You can set your browser to notify you when you receive a cookie and this will provide you with an opportunity to either accept or reject it in each instance.

3.6 We may gather your IP address as part of our business activities and to assist with any operational difficulties or support issues with our services. This information does not identify you personally.

4. How we may use and disclose your personal information

4.1 We will only use or disclose your personal information for the primary purposes for which it was collected or as consented to and/or set out below.

4.2 You consent to us using and disclosing your personal information to facilitate a purpose in connection with:-(a) the verification of your identity;

(b) the processing of orders (either by us or you), including to communicate with you concerning such orders;

(c) the administration and management of our or your services, including charging, billing, credit card authorisation and verification and collecting debts;

(d) the improvement of our or your products or services (including to contact you about those improvements and asking you to participate in surveys about the products and services);

(e) the maintenance and development of our services, products, business systems and infrastructure;

(f) marketing and promotional activities by us and our related bodies (including by direct mail, telemarketing, email, SMS and MMS messages);

(g) to provide customer service functions, including handling customer enquiries and complaints;

(h) to offer you upgrades, updates, or other content or products and services that may be of interest to you;

(i) our compliance with applicable laws;

(j) the sale, and matters in connection with a potential sale, of our business or company to a third party; and

(k) any other matters reasonably necessary to function as software designer and developer and a website and data hosting services provider.

4.3 We may also use or disclose your personal information and in doing so we are not required to seek your additional consent:-(a) when it is disclosed or used for a purpose related to the primary purposes of collection detailed above and you would reasonably expect your personal information to be used or disclosed for such a purpose;

(b) if we reasonably believe that the use or disclosure is necessary to lessen or prevent a serious or imminent threat to an individual's life, health or safety or to lessen or prevent a threat to public health or safety;

(c) if we have reason to suspect that unlawful activity has been, or is being, engaged in; or

(d) if it is required or authorised by law.

4.4 In the event we propose to use or disclose such personal information other than for reasons in 4.1, 4.2 and 4.3 above, we will first seek your consent prior to such disclosure or use.

4.5 If you have received communications from us and you no longer wish to receive those sorts of communications, you should contact us by telephone at 1300 965 232, and we will ensure the relevant communication ceases.

4.6 Any other use or disclosure we make of your personal information will only be as required by law or as permitted by the Privacy Act 1988 or by this privacy policy or otherwise with your consent.

5. The types of organisations to which we may disclose your personal information

5.1 We may disclose your personal information to organisations outside of DCP. Examples of organisations that your personal information may be provided to include:(a) offshore service providers (including our data centres, which are (without limitation) located in the United States of America);

(b) related entities and subsidiaries of DCP; and

(c) contractors and agents.

5.2 Your personal information is disclosed to these organisations only in relation to the services we provide to you or for a purpose permitted by this privacy policy.

5.3 We take such steps as are reasonable to ensure that these organisations are aware of the provisions of this privacy policy in relation to your personal information.

6. Cross border disclosure

6.1 DCP may disclose your personal information to entities or persons outside of Australia, including, but not limited to, its data centres, which are currently located in the USA.

6.2 To the extent that we need to disclose your personal information to an overseas recipient, you consent to such disclosure, but only for a purpose directly connected with the services provided by us or for a purpose otherwise permitted by this privacy policy.

7. Data quality and security

7.1 We have taken steps to help ensure your personal information is safe. You will appreciate, however, that we cannot guarantee the security of all transmissions or personal information, especially where the internet is involved.

7.2 Notwithstanding the above, we will take reasonable steps to:-(a) make sure that the personal information we collect, use or disclose is accurate, complete and up to date;

(b) protect your personal information from misuse, loss, unauthorised access, modification or disclosure both physically and through computer security methods; and

(c) destroy or permanently de-identify personal information if it is no longer needed for its purpose of collection.**7.3** However, the accuracy of personal information depends largely on the information you provide to us, so we recommend that you:(a) let us know if there are any errors in your personal information; and

(b) keep us up-to-date with changes to your personal information (such as your name or address).

8. Access to and correction of your personal information

8.1 You are entitled to have access to any personal information relating to you which we possess, except in some exceptional circumstances provided by law. You are entitled to edit or delete such information unless we are required by law to retain it or permitted to retain it in accordance with this privacy policy. However, we may keep track of past transactions for our accounting and audit requirements. Furthermore, it may be impossible to completely delete your information because some information may remain as backups.

8.2 If you would like access, delete, or correct any records of personal information we have about you, you are able to access, update and delete that information (subject to the above) by contacting us by telephone at 1300 965 232. We reserve the right to charge a fee for searching for and providing access to your information.

9. Governing law

This privacy policy is governed by the laws in force in Queensland, Australia. You agree to submit to the exclusive jurisdiction of the courts of that jurisdiction.

10. Consent

10.1 By using our website or by accepting the terms of one of our agreements which refer to this privacy policy, you are agreeing to the terms of this privacy policy.

10.2 We reserve the right to modify our privacy policy as our business needs require. We will post such changes on our website, after which, your continued use of the website or your continued dealings with us shall be deemed to be your agreement to the modified terms.