

Privacy Policy

In this Privacy Policy, 'us' 'we' or 'our' means Direct Internet Australia Pty Ltd (ACN 111 616 347). All Capitalised Terms used in this Policy have the same meaning as in the Terms unless otherwise indicated.

This Privacy Policy explains the way we collect and store your information. By providing Personal Information or data to us, you consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy and any other arrangements that apply between us. We may change our Privacy Policy from time to time by publishing changes to it on our Website. We encourage you to check our website periodically to ensure that you are aware of our current Privacy Policy.

1. Definitions

1. In this Privacy Policy, the following capitalised terms have the following meanings:
 - (a) **Automatic Data** means information which is collected automatically in accordance with clause 3.2.
 - (b) **Customer** means one of our customers who has purchased a licence to use our Service for the purpose of managing their car wash business.
 - (c) **Non-personal Information** means information which does not relate to a person and/or cannot be used to identify a person.
 - (d) **Personal Information** means any information which can be used to identify an individual, and is described in detail in clause 3.
 - (e) **Privacy Act** means the Privacy Act 1988 (Cth).
 - (f) **Service** means our any software, application, platform or system operated by us, including the software known as "Pulse", and our Website.
 - (g) **Us, we, or our** means Direct Internet Australia Pty Ltd (ACN 111 616 347).
 - (h) **User** means any person using or registered on the Service, whatsoever.
 - (i) **Website** means our website available at the following URL, <https://pulsewash.com.au/>.

2. Use of the Service and Application of the Policy

The Service

1. The Service is used by Customers to manage their car wash businesses.

Use by Us

2. We operate and maintain the Service. As part of this, we do collect Personal Information about all of our Users, and this Personal Information is used, disclosed and protected according to this Privacy Policy.

Use by Customers

3. Please note that the Customers use the Service to provide you services, and in those circumstances, they may be collecting your information about you through the Service (**Customer Collected Information**). It is important to note that Customer Collected Information is collected and stored by the Customers, and not us. As such, it is subject to the relevant Customer's privacy policy.

4. We process Customer Collected Information as per the Customers' direction, and we store it on our service providers' servers, but we do not have control over its collection or management.
5. We acknowledge that you have the right to access your Personal Information. In relation to Customer Collected Information, the relevant Customer is responsible for correcting, deleting or updating the information they have collected from you using the Service. However, we will assist in this process to the extent we are able to do so. If requested to remove data we will respond within a reasonable timeframe. We may work with the Customer to help them provide notice to Users about their data collection, processing and usage. We are not responsible for the Customer's use of the information they collect on the Service. If you have an issue relating to any Customer Collected Information, please contact the Customer that you interact with directly. If you are unable to do so or if you are not receiving a response, please contact us using the contact us feature below and we will attempt to resolve the issue.
6. To the extent any Customer Collected Information is deemed to be under our control, it will be subject to this Privacy Policy below.

3. What personal information do we collect?

1. We may collect Personal Information about you when you use the Service or interact with us in any way.
2. **Information you provide to us:** We collect all information which Users voluntarily provide to us through using the Service or interacting with us. This includes information provided:
 - (a) when visiting our Website;
 - (b) during registration;
 - (c) during correspondence, enquiries, support services or phone calls, or customer surveys; or
 - (d) uploaded onto the Service in any way.

The Personal Information we may collect includes without limitation:

- (a) basic information such as your first and last name;
 - (b) contact information including email address and phone number;
 - (c) demographic information such as postal code, age, and gender;
 - (d) information related to your use of the Service;
 - (e) other relevant information in relation to your Service needs;
 - (f) geographic location;
 - (g) login credentials for third-party websites;
 - (h) any other information that enables users to be personally identified.
3. **Information we automatically collect:** We also collect Automatic Data. Automatic Data includes without limitation, a unique identifier associated with your access device and/or browser (including, for example, your Internet Protocol (IP) address) characteristics about your access device and/or browser, statistics on your activities on the Service, details of the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries, or information about how you came to the Service. We collect Automatic Data based on your consent which was granted to us by you when you registered as a User and accepted this Privacy Policy.

4. **Non-personal Information:** When you interact with the Service, we may collect and/or share Non-Personal Information, with our partners like publishers, advertisers, developers, or rights holders. The limitations and requirements in this Privacy Policy on our collection, use, disclosure, transfer and storage/retention of Personal Information do not apply to Non-Personal Information. When you register for the Service or otherwise submit Personal Information to us, we may associate other Non-Personal Information (including Non-Personal Information we collect from third parties) with your Personal Information. At such instance, we will treat any such combined data as your Personal Information until such time as it can no longer be associated with you or used to identify you.

4. Why do we collect, use and disclose personal information?

1. We may collect, hold, use and disclose your personal information for the following purposes:
 - (a) to enable you to access and use our Service, including allowing you to interact with Customers ;
 - (b) to operate, protect, improve and optimise our Service, business and our Users' experience, such as to perform analytics, conduct research, for advertising and marketing and to improve the overall personalized service to each User;
 - (c) to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and the information requested by you;
 - (d) to improve the safety and reliability of our services including detecting, preventing and responding to fraud, abuse, security risks and technical issues;
 - (e) to send you marketing and promotional messages and other information that may be of interest to you, including information sent by, or on behalf of, our business partners that we think you may find interesting;
 - (f) to monitor your activity on our Service so that we may suggest/recommend digital content you might like based on such activity;
 - (g) to administer rewards, surveys, contests, or other promotional activities or events sponsored or managed by us or our business partners;
 - (h) to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties;
 - (i) to develop new services based on the feedback we receive and our understanding of the same. You shall be intimated of such services and use of your Personal Information if we roll out any such new services; and
2. We will also disclose your Personal Information to a trusted third party who also holds other information about you. This third party may combine that information in order to enable it and us to develop anonymised consumer insights so that we can better understand your preferences and interests, personalise your experience and enhance the products and services that you receive.

5. Do we use your personal information for direct marketing?

1. We and/or our carefully selected business partners may send you direct marketing communications and information about our services. This may take the form of emails, SMS, mail or other forms of communication, in accordance with the GDPR, the Spam Act and the Privacy Act. You may opt-out of receiving marketing materials from us by contacting us through the contact us feature below, or by using the opt-out facilities provided.

2. The Customer may send you direct marketing communications and information about their goods or services. It is possible that we will help facilitate these communications on behalf of the Customer. This may take the form of emails, SMS, mail or other forms of communication, in accordance with the Spam Act and the Privacy Act. You may opt-out of receiving marketing materials from them by contacting them directly, or by using the opt-out facilities provided (for example, an unsubscribe link). The Customer, and not us, are responsible for sending these communications.

6. To whom do we disclose your personal information?

1. We may disclose personal information for the purposes described in this Privacy Policy to:
 - (a) our employees, personnel and related bodies corporate;
 - (b) third-party suppliers and service providers (including providers for the operation of our Service and/or our business or in connection with providing our products and services to you);
 - (c) professional advisers, dealers and agents;
 - (d) payment systems operators (such as merchants receiving card payments);
 - (e) our existing or potential agents, business partners or partners;
 - (f) our sponsors or promoters of any competition that we conduct via our services;
 - (g) our investors or prospective investors;
 - (h) anyone to whom our assets or businesses (or any part of them) are transferred;
 - (i) specific third-parties authorised by you to receive information held by us; and/or
 - (j) other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

7. Processing and transfer of your Personal Information

1. Your information, including Personal Information, is processed at our support offices in Australia. It means that this information may be transferred to Australia and maintained on computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those from your jurisdiction.
2. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.
3. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Information will take place to an organisation or a country unless there are adequate controls in place including the security of your data and Personal Information.

8. Security

1. We may hold your Personal Information in either electronic or hard copy form. We take reasonable steps to protect your Personal Information from misuse, interference and loss, as well as unauthorised access, modification or disclosure and we use a number of physical, administrative, personnel and technical measures to protect your personal information. These measures are designed to provide a level of security appropriate to the risks of processing your Personal Information. However, we cannot guarantee the security of your Personal Information.

9. Retention

1. We retain your Personal Information as long as you are registered to the Service as a User. You may close your account by contacting us. However, we may retain Personal Information for an additional period as is permitted or required under applicable laws, including for reasons to honour your choices, and for our billing records. Even if we delete your Personal Information it may persist on backup or archival media for an additional period of time for legal, tax or regulatory reasons or for legitimate and lawful business purposes.
2. We take reasonable measures to destroy or de-identify personal information in a secure manner when it is no longer required.

10. Exclusions

1. **Links:** Our Service may contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, so we encourage individuals to read them before using those websites.
2. **Personal Information Provided to Others:** This Privacy Policy does not apply to any Personal Information that you provide to another User or visitor through the Service or through any other means, including to the Customer, or information posted by you to any public areas of the Service.

11. Accessing or correcting your personal information

1. You can access the Personal Information we hold about you by contacting us using the contact us feature below. Sometimes, we may not be able to provide you with access to all of your Personal Information and, where this is the case, we will tell you why. We may also need to verify your identity when you request your Personal Information.
2. If you think that any Personal Information, we hold about you is inaccurate, please contact us using the contact us feature below and we will take reasonable steps to ensure that it is corrected.
3. We will consider and respond to all requests in accordance with all applicable laws.

12. Making a complaint

1. If you think we have breached the Privacy Act or any other relevant privacy law, or you wish to make a complaint about the way we have handled your personal information, you can contact us using the contact us feature below. Please include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint within a reasonable period of time. If you think that we have failed to resolve the complaint satisfactorily, we will provide you with information about the further steps you can take.

13. Contact Us

1. For further information about our Privacy Policy or practices, to access or correct your personal information, or make a complaint, please contact us using the details set out below:
2. info@pulsewash.com.au

Effective: 31/03/2023