

GoDesta Pty Ltd | Privacy Policy

GoDesta Pty Ltd ACN 625 958 974 (**GoDesta**) has created this Privacy Policy to govern the way we collect, use, maintain, secure and disclose your personal information when disclosed electronically, or in hard copy, in connection with the products and services we offer.

GoDesta is committed to protecting the privacy of your personal information that is collected through the GoDesta website www.GoDesta.com (**Site**), the software, and the application for mobile devices (**collectively referred to as 'Programs'**) or directly from you. This is in accordance with all relevant legislation.

When you provide GoDesta with personal information, it indicates you have accessed our Privacy Policy and that you have read and accept the terms contained therein.

Our ability to effectively process your data is reliant on true, complete and accurate information provided by you. In order to protect your privacy and security, we will not update your information unless we are able to verify your identity through your name and email address.

If you have any questions about how we collect or use your data, please contact us using any of the methods set out at the end of this Privacy Policy.

If you do not agree with this Privacy Policy, we ask that you refrain from using our services.

1. What types of personal information do we collect?

Throughout this Privacy Policy, we use the term "personal information" to describe any data that personally identifies you or makes you personally identified.

The personal information that we may collect to enable your use of the GoDesta Site and Programs includes:

- a) Names of Individuals;
- b) Company Names;
- c) Date of birth;
- d) Telephone number;
- e) Email address;
- f) Home address;
- g) Any "additional information" provided directly by you via our forms;
- h) Payment details;
- i) Emergency contact details;
- j) License information (drivers only);
- k) Username and password for the GoDesta Site and Programs; and
- l) Any information gathered from requests, feedback or complaints you may make.

2. How do we collect your personal information?

We may collect personal information from you directly in person or by telephone, email, post, via the Site or the Programs. We may also receive information via an intermediary we have a relationship with, such as a manufacturer or supplier.

We may also collect any other information as requested on the Site, the Programs or otherwise requested by GoDesta or provided by you.

Personal information and your personal details may be collected from you in a number of different ways, including but not limited to:

- a) When you register for the GoDesta Programs;
- b) When you access and interact with the GoDesta Programs or Site;
- c) When GoDesta provides services to you.

We may log information about your access to and use of our Site, including through Internet cookies, your communications with our Site, your browser preference, your operating system, and the IP Address of your Internet Service Provider.

From time to time we may contact you with questionnaires, surveys or market research to improve our GoDesta Programs or Site. Your participation in and provision of this information is optional.

If we receive your information from third parties, it will be protected in accordance with our Privacy Policy.

3. How do we use your personal information?

If you consent to us processing your personal information, we will not collect, use or disclose your personal information for any purposes other than those identified below, except with your consent.

We may process your personal information for the following purposes:

- a) To enable your access to the data stored in the GoDesta Site and Programs;
- b) For user verification;
- c) Provision of driver information to the relevant client for compliance purposes;
- d) Contacting you in relation to comments, complaints, enquiries or dispute resolution;
- e) Communicating with third party providers or associate parties with respect to the provision of the GoDesta Programs;
- f) Measuring the effectiveness and usage of the GoDesta Site and Programs;
- g) Internal record keeping such as tracking usage and traffic on the Programs;
- h) Market research, marketing, and business development;
- i) White papers, case studies, reporting and trends;
- j) Invoicing and billing you (if required);
- k) To keep your records up to date;
- l) To communicate information about our products and services to you;
- m) Providing you with additional benefits;
- n) To identify you (generally and including to identify whether you have asked for your data to be destroyed);
- o) To confirm whether your personal information has been destroyed; and
- p) To comply with any of our legal requirements.

We will not process your personal information for any other purposes which are incompatible with these purposes. If we intend to use your information in any other way than is described in this Privacy Policy, we will disclose this to you and request your consent.

You have the right to withdraw your consent at any time but it will not affect the lawfulness of processing based on consent before its withdrawal. This withdrawal may also impact on our ability to provide our services to you and may result in us cancelling the request for services.

4. Disclosure of Personal Information

GoDesta will not disclose your personal information, unless it is required, incidental or otherwise related to the primary purpose of providing services to you or a third party, such as provision of your personal information for which you have consented by accessing and interacting with the GoDesta Programs.

GoDesta may disclose your personal information to its business partners who assist in providing services to you as a customer.

If GoDesta is required to disclose your personal information to the extent required under law, including but not limited to in connection with legal proceedings or prospective legal proceedings, and to establish or defend GoDesta's rights, GoDesta will notify you of this disclosure.

GoDesta is not liable for how a third party chooses to use your personal information if the extent of the personal information has been disclosed in accordance with this Privacy Policy.

5. Parental Consent

In order to protect the privacy of children, we require parental or guardian consent for all children under the age of 18 to access the Programs and to be able to use their personal information. No sample or information will be handled without this explicit consent. If this consent is not provided, we will promptly remove any personal information provided from our database.

6. Do we process any anonymised or de-identified information?

We sometimes anonymise or de-identify information by removing all of the personally-identifiable information such as your name, date of birth and address. We may then use this de-identified information for the purpose of auditing, quality assurance and research on the basis that they are anonymous and unidentifiable.

None of your personally-identifiable information will ever be used in any reports or publications.

You may withdraw your consent to us processing your de-identified information in the future by contacting us using any of the methods set out at the end of this Privacy Policy. This withdrawal does not affect the lawfulness of processing based on consent given before this withdrawal.

7. Do we ever disclose your personal information to third parties?

We do not sell your data and do not pass your personal information to third parties for any marketing purposes. We will not disclose your personal information to any third party unless required to by law or as specified under this Privacy Policy.

8. How do we transmit your personal information internationally?

In order to provide our services to you, we may transfer, process or store personal information in countries outside where you are located.

In these cases, we have strict contractual requirements with our third parties and appropriate safeguards as to how they are able to collect, use, maintain, secure and disclose information.

If you do not consent to your personal information being stored or processed internationally, you should not use our services.

9. How is your personal information kept secure?

We take the security of your personal information seriously. In order to do so, we have implemented the following protocols:

- **Password Policy** – strong and unique passwords are required for each user.
- **File Shares** – all file sharing between us and third parties is password protected.
- **Antivirus** – market-leading antivirus software is used for the Site and Programs and is monitored regularly.
- **Backups** – backup software is used to store regular incremental backups of critical services.
- **Encryption** – all data is passed through a secure server using the latest Secure Sockets Layer (SSL) encryption technology.
- **Data Hosting** - data is currently hosted on-premises, however we reserve our rights to change hosting locations at any time, including internationally.

These barriers safeguard and secure the information to prevent misuse, interference, loss, or unauthorised access, amendment, or disclosure.

GoDesta regularly backs up its data, however you are responsible for ensuring your own data is backed up. GoDesta is not responsible for any loss or corruption of data whatsoever due to poor practices, user error, or malicious intent.

10. How long do we hold onto your personal information?

We store your personal information:

- for as long as needed in order to provide the requested services to you as set out in this Privacy Policy;
- for as long as reasonably needed in order to respond to any queries you may have;
- for as long as you might legally bring claims against us; or
- for as long as the law requires in order to satisfy our legal, audit and compliance requirements.

We will generally only hold your personal information for one to seven years.

You are able to request us to destroy your personal information at any time, but you acknowledge that this may impact on our ability to provide services to you. Your personal information will then be destroyed, with the exception of your deletion request, a confirmation that the information was deleted and any data required in order for us to meet our legal obligations.

11. Are you able to request information or make changes?

You may ask us at any time to provide you with a list of the personal information we hold about you, and for copies of that personal information. We will endeavour to provide you with the data within 30 days of receiving your request. For more complicated matters, we may need to extend this deadline to 60 days.

You can exercise this right by contacting us using the information below:

Writing to:

GoDesta Pty Ltd

PO Box 3323

Newstead

QLD 4006

Emailing us at:

hello@GoDesta.com

We will endeavour to provide these requests free of charge. However, if a request is manifestly unfounded or excessive, we reserve the right to charge a reasonable fee to cover our administrative costs or refuse to act on the request.

If you believe for any reason that we are holding inaccurate or incomplete data about you, you may ask us to correct it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment, then we will add a note to the personal information stating that you disagree with it.

Our ability to effectively process your data is reliant on true, complete and accurate information provided by you at the time that you engage us to provide the services. We will not update your information or release your results:

- unless we are able to verify your identity through your name and email address; or

- if you have previously knowingly provided us with false information regarding your identity.

12. Do we collect sensitive personal information?

Sensitive information is defined in the *Privacy Act 1988* (Cth) to include information or opinion about things such as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record, or health information.

GoDesta generally does not collect sensitive information. We will notify you specifically if we do collect sensitive information.

13. Cookies & Web Beacons

GoDesta may use cookies on the Site from time to time. Cookies in and of themselves do not provide us with personal information, however if you provide your personal information on the GoDesta Site, GoDesta may gather information that is linked to data stored in the cookie.

GoDesta may use web beacons from time to time. This will monitor behaviour such as counting user visits, or deliver a cookie to the browser of a visitor viewing the GoDesta Site.

14. Links to Other Websites

GoDesta's Programs or website may from time to time contain links to third party websites. GoDesta does not exercise any control over these websites, and GoDesta is not responsible for or liable for the protection and privacy of personal information you provide on these external websites. We recommend you review the Privacy Policy of these websites before providing your personal information.

15. Amendments

This Privacy Policy is available online via <http://www.GoDesta.com/wp-content/uploads/2019/07/Privacy-Policy.pdf> or by clicking the "Privacy Policy" link located on the Programs.

This Privacy Policy may be amended from time to time and at our sole discretion and without notification. By continuing to use the GoDesta Programs or Site following amendments, you indicate that you accept the amendments. It is your responsibility to regularly review the Privacy Policy, particularly before providing personal information, to ensure you are aware of and accept any amendments.

16. Who can I contact to make a complaint?

If you believe that we have breached our privacy reporting obligations under the Act, or you are unsatisfied with the manner in which we have dealt with your personal information, you may make a complaint by emailing or writing to us at:

Writing to:

GoDesta Pty Ltd
PO Box 3323
Newstead
QLD 4006

Emailing us at:

hello@GoDesta.com

We will respond to you within 30 business days to attempt to resolve any complaints or disputes.

If you are still unsatisfied, you may wish to direct your complaint to the Office of the Australian Information Commission at <http://www.oaic.gov.au/> or alternatively:

Phone: 1300 363 992

In writing: The Office of the Australian Information Commissioner, GPO Box 5218, Sydney NSW 2001