**PRIVACY STATEMENT**

**Genius365**

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| **Introduction** |  | This statement includes:* our *collection statement*, explaining aspects of our collection and use of personal information
* our *privacy policy*, further explaining how we manage personal information.
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|  |  | **COLLECTION STATEMENT** |
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| **Who we are** |  | Genius365 Pty Ltd ACN 679 963 967 |
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| **Our contact details** |  | * Phone: [Number]
* Email: [Address]
* Web site: [URL]
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| **Collection from third party sources** |  | We may collect personal information from someone other than you, and you may not be aware of the collection, when it is not reasonable or practicable to collect it from you, and it is available from:* publicly available sources like phone books and social media
* other companies in our group that you may have dealt with
* third parties like our business partners, your authorised representative/s and wholesalers
* information brokers
* other service providers that interact with us in providing products to you
* fraud checking agencies
* our dealers, contractors and other representatives that you may deal with
* our websites and how you use them
* various parties listed under *Disclosing personal information* in our Privacy Policy.
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| **Why we collect and hold personal information** |  | We collect and hold personal information because:* we may need to use it to operate our business
* we may need to provide it to other parties in connection with our business
* we may need it to comply with the law.

The uses and disclosures we may make of personal information are detailed in our Privacy Policy. |
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| **Unavailability of personal information** |  | If we cannot collect the information we need about you, we may not be able to supply the products or services you want.  |
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| **Disclosing personal information** |  | We may disclose personal information as reasonably required to contractors and suppliers who goods and services that we use to operate our business and provide products and support to you, and to other parties detailed in our Privacy Policy. Some of these parties may be based overseas eg India, if we utilise resources in that country.  |
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| **Access and correction** |  | Our privacy policy contains information about how the you can access and seek correction of the personal information about you that we hold. |
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| **Complaints** |  | Our privacy policy explains how you can complain about a breach of the Australian Privacy Principles, and how we will deal with such a complaint. |
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|  |  | **PRIVACY POLICY** |
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| **Personal information** |  | This refers to information or an opinion about a living person who is identified or reasonably identifiable, whether or not true and whether or not recorded in material form.  |
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| **Kinds of personal information we collect and hold** |  | Broadly, we may collect and hold:* *personal details* like name, date of birth, gender, occupation and driver licence number
* *contact details* like physical, postal, work and email addresses and phone numbers
* *financial details* like bank account, credit card numbers and your billing and payment history with us
* *service-related details* like your user name, encrypted password and service usage history, support incidents, enquiries and complaints

In any case, we only collect personal information that is reasonably necessary to support our functions and activities. If we cannot collect the information we need about you, we may not be able to supply the products or service you want.  |
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| **Collecting personal information** |  | Unless it is not reasonable or practicable to do so, and in other cases allowed by law, we will collect personal information about you directly from you (eg when you contact us by phone or online, or at our premises, or fill in an application form).In other cases, we may collect personal information about you from:* publicly available sources like phone books and social media
* other companies in our group that you may have dealt with
* third parties like our business partners, your authorised representative/s and wholesalers
* information brokers
* other service providers that interact with us in providing products to you
* fraud checking agencies
* our dealers, contractors and other representatives that you may deal with
* our websites and how you use them
* various parties listed under *Disclosing personal information* below.
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| **Holding personal information** |  | We hold personal information in hard and/or soft copy at our offices and in other facilities that we own or license from third parties, like data centres. We take reasonable steps to keep it secure and to protect it from unauthorised access, use or alteration.  |
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| **Why we collect and hold personal information** |  | We collect and hold personal information because:* we may need to use it to operate our business
* we may need to provide it to other parties in connection with our business
* we may need it to comply with the law.
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| **Using personal information** |  | We may use personal information:* to identify you
* for credit checks
* to prevent fraud
* to supply products (including goods and/or services) to you
* to give you information about us and our products, and product offers
* for direct marketing – see *Direct marketing* for details
* to improve our products, our marketing and our website
* to answer your enquiries
* to give you customer support and service
* to better understand your needs and respond to them
* to manage and plan our products and business
* to charge and bill you for products you use
* to collect payment from you
* to monitor, manage, test and improve our facilities
* for other purposes related to the operation of our business.
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| **Disclosing personal information** |  | We may disclose personal information as reasonably required:* to contractors and suppliers who supply or support us in:
	+ market research, sales and marketing
	+ direct marketing – see *Direct marketing* for details
	+ identity and fraud checking
	+ credit management
	+ service provisioning
	+ installation, maintenance and repairs
	+ helpdesk and enquiries
	+ support and complaint management
	+ communications and mailing
	+ billing, debt recovery and credit management
	+ product design and maintenance
	+ corporate strategy
	+ legal and regulatory advice and compliance
	+ accounting and financial planning
	+ risk management
	+ otherwise providing goods and services that we use to operate our business and provide products and support to you
* to your authorised representative/s
* if you ask us to do so
* to our agents, dealers and members of our corporate group
* to our business partners and wholesale suppliers
* to other service providers that interact with us in providing products to you
* to organisations that provide credit or finance to us
* to persons who invest in or acquire all or part of our business or company, or are considering doing so.

Some of these parties may be based overseas eg India, if we utilise resources in that country.  |
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| **Direct marketing** |  | We may use and disclose personal information to direct market to you products offered by us, our agents, dealers and members of our corporate group, and our business partners, where we think the offers will be of interest to you, using:* post
* email
* electronic messaging
* social media
* targeted web content
* other direct marketing channels.
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| **Accessing and correcting personal information** |  | Please contact us for these purposes using the details in *Contacting us* below. We shall process and respond to your request in accordance with Australian Privacy Principle 12. There is no charge for making a request but a reasonable administrative charge, on a cost recovery basis, may be payable before we agree to provide access. |
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| **Complaints** |  | If you wish to complain about a breach of the Australian Privacy Principles, please contact us using the details in *Contacting us* below. We shall:* acknowledge your complaint within a reasonable time
* give you an estimated first response time
* allocate your complaint to a suitably senior staff member
* process and respond to your complaint as soon as we reasonably can.
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| **Contacting us** |  | Questions, requests and complaints regarding our Privacy Statement or our compliance with privacy laws should be directed to us by telephone on [number] or email to [address]. |