

## **PRIVACY POLICY**

### **Who are we?**

Jim's Group Pty Ltd ACN 101 925 268 (a company incorporated under the laws of Australia), Jim's Group (New Zealand) Limited, Company Number 5303661 (a company incorporated under the laws of New Zealand), Jim's Franchising Group Canada Limited BC 1154696 and Franchisors, Franchisees, contractors or Call Centres within the 'Jim's' system.

### **What this policy covers**

This policy covers data that we process and store about:

1. People who visit our websites;
2. People who sign up to our newsletters and updates; and
3. Our customers of Jim's who use the services of its franchisees.

### **Information we may collect and process about you**

1. Information that you provide by filling in forms on our site;
2. Your name, email address, physical address and source of contact when you sign up to request educational information or marketing communications.
3. If you contact us, we may keep a record of that correspondence.

### **Where we store your information**

Your personal information may be stored on a server in the United States of America. Furthermore, if your personal information has been obtained in a country outside Australia, your personal information may be transferred to Australia.

The Jim's head office is situated in Melbourne, Australia. Any information you provide us will be held securely at our premises.

### **How we use your information**

1. To provide Jim's services and to carry out our obligations arising from any contracts entered into between you and Jim's franchisees, this includes customer feedback surveys on any services provided to you by Jim's or a Jim's franchisee, these customer feedback surveys are integral to the transaction, it enables Jim's to improve services to you and address any concerns which may arise, but you are not obliged to respond to a request for customer feedback.
2. To notify you about changes to our services or our terms and conditions.
3. We may invite you to sign up to our newsletter, which provides general information about our franchise divisions, the services offered by each and information about franchising.
4. To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.

We occasionally hire other companies to provide limited services on our behalf, such as handling the processing and delivery of newsletter mailings, processing transactions, surveys, or performing statistical analysis of our services. We will only provide those companies the information they need to deliver the service. In some instances, these companies may collect information directly from you. In

these cases, you will be notified of the involvement of the external service provider. In all cases, these companies are subject to agreements that require them to maintain the confidentiality of your information and they are prohibited from using that information for any other purpose.

### **How long we retain data**

We have to keep information about our customers for a period of time specified by current legislation to comply with certain legal, tax and accounting rules.

### **Security**

We have a policy in place covering data protection, confidentiality and security and we review regularly the appropriateness of the measures we take to keep the data that we hold secure.

Whenever we transfer personal data we use secure connections and whenever we store personal data it is encrypted.

### **Privacy of Children**

If you are less than 18 years old, please do not send any user information to us--including information such as your name, address, or e-mail address. We do not knowingly collect (nor do we wish to collect) any personally identifiable information or other user information from children under the age of 18. In the event that we learn we have collected any personal information from a child under the age of 18, we will delete that information from our database and terminate the corresponding account, if any.

### **Social Media Widgets**

Our website includes social media features, such as the Facebook Like button and widgets, such as the Twitter button or interactive mini-programs that run on our site. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our site. Your interactions with these features are governed by the privacy policy of the company providing it.

Jim's Group reserves the right to make material changes to its Privacy Policy. These changes will be posted prominently to our privacy policy, the home page, and other places we deem appropriate.

### **Your rights about your data**

If we're sending you information or marketing communications that you no longer want to receive, you can unsubscribe easily using the features and links we provide in each email we send.

You may:

1. Ask us what data we hold about you and make sure it's correct.
2. Ask for a copy of your personal data or ask us to delete all your personal data.

When you make a request to access personal information, we will require you to provide some form of identification (such as a driver's licence or passport) so we can verify that you are the person to whom the information relates, and that you identify the type/s of information requested

If we do hold information about you we will:

1. give you a description of it;

2. tell you why we are holding it;
3. tell you who it could be disclosed to;
4. let you have a copy.

If you believe that any information we hold about you is incorrect or incomplete, please contact us at the below address. We will promptly correct any information found to be incorrect.

### **As Required By Law**

Jim's may disclose your personal information if required to do so by law such as to comply with a subpoena or in the good faith belief that such action is necessary to conform to the edicts of the law, protect your safety or the safety of others, investigate fraud or comply with a judicial proceeding, court order or legal process served on Jim's or to protect and defend the rights or property of Jim's.

Notice to EU Individuals: Jim's will not process your user information without a lawful basis to do so, as such bases are defined in Article 6 of the GDPR. In general, Jim's will process your user information on the legal bases of consent, contract (if you have entered into an agreement with us and such processing is a necessary part thereof), or legal obligation (as noted above). Jim's may also process certain user information on the basis of the following legitimate interests, provided that such interests are not overridden by your privacy rights and interests: delivering and continuing to develop and improve the website and services, learning from your behaviour on the website (e.g. analysing traffic) to better serve you and other website users, helping us modify or enhance the website and its content, receiving insight as to what users do (and don't) like about our services, website or aspects thereof, and providing a stable, consistent, and secure user experience in connection with the website and services.

### **Privacy Contact**

You may contact us at [legal@jims.net](mailto:legal@jims.net) for all privacy related matters. Please address your correspondence to "Privacy: Legal Department".

### **Changes to our Privacy Policy**

We keep our privacy policy under regular review. Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

This policy was last updated May 2018.