

Sports Stars Pty Ltd Privacy Policy

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Sports Stars Pty Ltd (“**Starfinda**”, “**we**”, “**us**” or “**our**”) is committed to respecting your privacy. Our Privacy Policy sets out how we collect, use, process, store, share and disclose your personal information.

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1 Openness and transparency

We are committed to protecting your privacy and respecting and upholding your rights under and the Australian Privacy Principles (**APPs**) contained in the Privacy Act 1988 (Cth) and the General Data Protection Regulation (EU 2016/679) (the **GDPR**) (collectively, **Privacy Laws**). We ensure that we will take all necessary and reasonable steps to comply with the relevant Privacy Laws and to deal with inquiries or complaints from individuals about compliance with the relevant Privacy Laws.

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By accessing and using our website, products and services, you freely and expressly consent to the collection, use, processing, storage and disclosure of personal information by us as set out in this Privacy Policy.

2 Personal information

Personal information is any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

The type of personal information we collect from you includes, without limitation, the following:

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- your full name;
- address;
- email address;
- telephone number(s);
- date of birth;
- credit card information;

- gender;

- your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;
- 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;
- any additional information relating to you that you provide to us directly through our website or app or indirectly through your use of our website or app or online

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presence or through other websites or accounts from which you permit us to collect information;

- information you provide to us through customer surveys;
- billing information (including credit and bank details); or
- any other personal information that may be required in order to facilitate your dealings with us.

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3 Collection

We will collect Personal Information only by lawful and fair means and not in an unreasonably intrusive way. Generally, we will collect personal information directly from you, and only to the extent necessary to provide our products and services requested or ordered by you and to carry out our administrative functions or as required by a relevant Privacy Law. We will **not** collect sensitive personal information (as defined under the relevant Privacy Laws) from you, **however will only do so with your consent**. We also do not knowingly seek or collect Personal Information from children below the age of 16 years.

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We may also collect Person Information from you when you fill in an application form, communicate with us, visit our website, provide us with feedback, complete online surveys or participate in competitions. We may collect Personal Information about you that you have provided to our business partners or from third parties and in respect of which you have given the third party permission to share with us.

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If you use a pseudonym when dealing with us or you do not provide identifiable information to us, we may not be able to provide you with any or all of our services as requested. If you wish to remain anonymous when you use our website do not sign into it or provide any information that might identify you.

We require individuals to provide accurate, up-to-date and complete Personal Information at the time it is collected.

4 What is our legal basis?

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Under the GDPR, we must have a legal basis to process Personal Information collected from individuals residing in the European Union. We rely on several legal bases to process your Personal Information, including:

- where it is necessary to provide you with access to, and use of, products, services and websites;
- for our legitimate interests to provide, operate and improve our products, services or website;
- where you have freely and expressly consented to the processing of your Personal Information by us, which you may withdraw at any time; or
- where we are under a legal obligation to process your Personal Information.

5 What do we do with your Personal Information?

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We use, process and disclose your Personal Information for the purposes for which the information is collected, or for a directly related purpose, including (but not limited to):

- providing our website, products and services to you;
- administering, protecting, improving or optimising our website, products and services (including performing data analytics, conducting research and for advertising and marketing purposes);
- billing you for purchasing or using our website, products and services;
- informing you about our website, products, services, rewards, surveys, contests, or other promotional activities or events sponsored or managed by us or our business partners;
- responding to any inquiries or comments that you submit to us;
- verifying your identity;
- any other purpose you have consented to; and
- any use which is required or authorised by a relevant Privacy Law.

6 Disclosure of Personal Information

We may disclose your Personal Information to:

- third-parties we ordinarily engage from time to time to perform functions on our behalf for the above purposes;
- any person or entity to whom you have expressly consented to us disclosing your Personal Information to;
- our external business advisors, auditors, lawyers, insurers and financiers; and
- any person or entity to whom we are required or authorised to disclose your Personal Information to in accordance with the relevant Privacy Laws.

7 Access and management

Subject to some exceptions provided by the relevant Privacy Laws, you may request access to your Personal Information in our customer account database, or seek correction of it, by contacting us. See section 13: Contact information. Should we decline you access to your Personal Information, we will provide a written explanation setting out our reasons for doing so.

We may charge a reasonable fee that is not excessive to cover the charges of retrieving your Personal Information from our customer account database. We will not charge you for making the request.

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If you believe that we hold Personal Information about you that is not accurate, complete or up-to-date then you may request that your Personal Information be amended. We will respond to your request to correct your Personal Information within a reasonable timeframe and you will not be charged a fee for correcting your Personal Information.

If we no longer need your Personal Information for any of the purposes set out in this Privacy Policy, or as otherwise required by the relevant Privacy Laws, we will take such steps as are reasonable in the circumstances to destroy your Personal Information or to de-identify it.

8 Direct marketing

Where we:

- have your express consent (which you may withdraw at any time by contacting us);
- have a legal basis; or
- are otherwise permitted by relevant Privacy Laws,

we may use and process your Personal Information to send you information about products and services we believe are suited to you and your interests or we may invite you to attend special events.

At any time you may opt out of receiving direct marketing communications from us. Unless you opt out, your consent to receive direct marketing communications from us and to the handling of your Personal Information as detailed above, will continue. You can opt out by following the unsubscribe instructions included in the relevant marketing communication, or by contacting us in writing at darreninfo@starfinda.com.au.

#CA-NOTE: Please confirm above email for contact.

109 Cross-border disclosure

We may disclose your Personal Information to third party recipients located in or outside of the European Union and Australia in order to provide our website, products and services to you. As at the date of this Privacy Policy, such third-party recipients are located in the United States of America (Recipients).

When entering into a transaction with us you expressly and freely consent to your Personal Information being disclosed or transferred to such Recipients. We will take steps reasonably necessary to ensure your Personal Information is treated securely and in accordance with this Privacy Policy. We use reasonable endeavours to ensure that each Recipient receiving your Personal Information is bound by the relevant Privacy Laws (including the Standard Contractual Clauses approved by the European Commission). The standard contractual clauses are available on the internet at the address http://ec.europa.eu/justice/data-protection/international-transfers/transfer/index_en.htm.

110 Starfinda websiteWebsite

When transmitting Personal Information from your computer to the Starfinda websiteWebsite, you must keep in mind that the transmission of information over the Internet is not always completely secure or error-free. Other than liability that cannot lawfully be excluded, we will not be liable in any way in relation to any breach of security or any unintended loss or disclosure of that information.

The Starfinda websiteWebsite may use 'cookies' or other similar tracking technologies on our website that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser but if you do so, you may not be able to fully experience the interactive features of the Starfinda websiteWebsite.

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Website means, in relation to this Clause 10 and Clause 11, the website located at www.starfinda.com.au or any other website nominated by us from time to time, the Starfinda mobile application available on the iOS App Store and Google Play store, and any associated services, software, networks or processes.

1211 Security

We may hold your Personal Information in either electronic or hard copy. 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. For example, we encrypt all user passwords stored via the Website, and we use secure credit card processing services.

#CA NOTE: Please confirm with your developers the measures taken to protect personal information internet and therefore you disclose information to us at your own risk. We will not be liable for any unauthorised access, modification or disclosure, or misuse of your Personal Information.

However, we cannot guarantee the security of any Personal Information transmitted over the internet and therefore you disclose information to us at your own risk. We will not be liable for any unauthorised access, modification or disclosure, or misuse of your Personal Information.

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1312 Enhanced privacy rights (European Union only)

Under the GDPR, an individual residing in the European Union has enhanced privacy rights, including the right to:

- require us to correct any Personal Information held about you that is inaccurate or incomplete;
- require the deletion of Personal Information concerning you in certain situations;
- data portability for Personal Information you provide to us;
- object or withdraw your consent at any time to the processing of your Personal Information;
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you; or
- otherwise restrict our processing of your Personal Information in certain circumstances.

1413 Contact information

If you require further information regarding our Privacy Policy or wish to make a privacy complaint, please contact us at darren@starfinda.com.au or info@starfinda.com.au

1514 Miscellaneous

We reserve the right to modify this Privacy Policy in whole or in part from time to time without notice and amendments will be effective immediately upon posting of the amended Privacy Policy on the Starfinda website.

Dated: insert 20 July 2018.

