

**Privacy Policy**  
**Effective 12<sup>th</sup> August 2025**

**1. What is a Privacy Policy?**

- 1.1 This Privacy Policy (**Policy**) sets out, in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**), and the Australian Privacy Principles (**APPs**) (if applicable) the way in which Mega Rewards Pty Ltd collectively, (**our, us, or we**) may collect, store, use, disclose, manage and protect your Personal Information.

Platforms: when we refer to our **Platforms** it includes the website a [www.megarewards.au](http://www.megarewards.au) including all associated websites and sub-domains, the Facebook page located at [www.facebook.com/megarewardsau](https://www.facebook.com/megarewardsau) and all associated applications, and any other online platforms operated by us.

- 1.2 By:

- (a) obtaining, using or enjoying products and / or services offered by us, or engaging in events run by us;
- (b) accessing, subscribing to, downloading or using content or functions of the Platforms and their services;
- (c) requesting information on, enquiring about, using, receiving or providing feedback in relation to our services (online, in writing, by telephone or in person); or
- (d) otherwise providing, or consenting to the collection of, Personal Information by us or our agents or employees,

after this Policy has been brought to your attention, you acknowledge and consent to the use, collection, storage or disclosure of your Personal Information by us in accordance with this Policy and the Privacy Act.

- 1.3 If you **do not** agree to us handling your Personal Information in the manner set out in this Policy we will not be able to provide our services to you and you should not provide us with any Personal Information.

**2. What is Personal Information?**

- 2.1 We follow the definition of Personal Information given in the Privacy Act:

*“Personal Information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:*

- (a) *whether the information or opinion is true or not; and*
- (b) *whether the information or opinion is recorded in a material form or not.”*

- 2.2 We may be required to collect and hold Sensitive Information. According to the Privacy Act, Sensitive Information includes but is not limited to:

*“personal information, health, racial or ethnic origin, political opinions, membership of a political association, professional or trade association or trade union, religious beliefs or*

*affiliations, philosophical beliefs, sexual orientation or practices, criminal record, biometric information that is to be used for certain purposes.”*

### **3. What kinds of Personal Information might we collect and hold?**

The Personal Information we may collect, hold and process about you depends upon your relationship with us, the service you have requested from us and how you interact with us, for example, as a member, entrant into our competitions, partner, or visitor to our Platforms. This information may vary depending on our specific needs.

#### **3.1 For our customers and prospective customers**

When you enquire about our partner offerings or when you become a member, a record is made which includes your Personal Information. We may collect the following kinds of Personal Information:

- (a) personal and contact details which includes your full name, address, email address, telephone number and other identification information;
- (b) socio-demographic information such as age, date of birth, occupation, nationality, residential status and marital status;
- (c) information about how you interact with us such as details of when you call us, use our services, make an enquiry, provide feedback or make a complaint;
- (d) digital information including information such as location information (if enabled on your devices), IP address, details of the device and software used to access our websites and digital services;
- (e) call records when you contact us (we will let you know at the start of each phone call if the call is being recorded);
- (f) information required to provide a service or information you have requested; and
- (g) any other information relating to you that you provide to us directly.

We limit the collection of Sensitive Information to when the information is reasonably necessary for, and directly related to, our services and activities and with your consent. Sensitive Information that we collect may include sexual orientation. We will treat your Sensitive Information appropriately and with utmost confidentiality and respect.

We will only keep your Sensitive Information whilst you consent to us doing so, or if we are required to by law or to protect a legal right. If you want us to destroy or de-identify your Sensitive Information you may request, we do so in writing and unless legally required to retain it or it is needed to protect our legal rights, we will do so promptly. This may, however, limit our ability to serve and assist you.

#### **3.2 Entrants into our competitions**

We collect Personal Information from you when you enter into a competition or lottery run by us. The types of information we collect generally include your name, contact details, postal address, email, age and information about our interactions and transactions with you.

### 3.3 Prospective employees or applicants

We collect Personal Information, including Sensitive Information, when recruiting staff, such as your name, contact details, qualifications, employment history, trade union membership, and criminal record. Generally, we will collect this information directly from you.

We may also collect Personal Information from third parties in ways which you would reasonably expect (for example, from referees you have nominated or recruitment agencies). Before offering you a position, we may collect additional details such as your tax file number (TFN) and superannuation information and other information necessary to conduct background checks to determine your suitability for certain positions (for example, positions which involve working with children).

We will manage your TFN (if recorded) in accordance with the Privacy (Tax File Number) Rule 2015 and the Taxation Administration Act 1953. A breach of the Privacy (Tax File Number) Rule 2015 Employee Records is considered an interference with privacy under the Privacy Act.

### 3.4 Other individuals

We may collect Personal Information about other individuals who are not our customers such as service providers, partners and contractors, and other individuals who interact with us on a commercial basis. The kinds of Personal Information we collect will depend on the capacity in which you are dealing with us. Generally, it would include your name, contact details, business name, postal address and information regarding our interactions and transactions with you.

### 3.5 Visitors to our Website

You may visit our Platforms without identifying yourself. If you identify yourself (for example, by providing your contact details in an enquiry), your Personal Information will be managed in accordance with this Policy.

## 4. How do we collect Personal Information?

### 4.1 We collect Personal Information:

- (a) directly from you, for example, when you provide that information to us, we contact you or when you contact us;
- (b) when providing our services;
- (c) when you participate in our services, including our competitions or other marketing or promotional activities;
- (d) from third parties who you have authorised to provide us with information; and
- (e) from publicly available sources such as the internet and social media.

## 5. How do we hold and secure your Personal Information?

### 5.1 We store your personal information digitally only.

- 5.2 All digital material is stored on secure data storage systems located inside Australia which are password protected. Any digital transfer of Personal Information is via secure channels such as HTTPS where possible, and user passwords are encrypted using a one-way hash. Any database we manage is only accessible through a local network connection. All confidential documents are securely shredded by a third-party provider after storage is no longer necessary or required for our purposes.
- 5.3 We destroy or de-identify Personal Information in a secure manner when we no longer need it. For example, we generally destroy a record about a complaint after 7 years from when the complaint was resolved.
- 5.4 We conduct regular audits of our compliance with this Policy and the Privacy Act to ensure that our privacy framework is in line with industry best-practice.

## **6. Why do we collect, hold, use and disclose Personal Information?**

6.1 We collect Personal Information for a number of reasons, including:

- (a) providing you or a third party with our services or information about our services;
- (b) sending communications, you request or contacting you and responding to your enquiries;
- (c) to run our competitions and promotional activities;
- (d) providing third parties with information about you and your activities for the purpose of providing to you our products and / or services from our partners including (but not limited to):
  - i. food service providers;
  - ii. retail outlets;
  - iii. finance service providers;
  - iv. property service providers
  - v. insurance service providers;
  - vi. vehicle service providers;
  - vii. sport organisations;
  - viii. accounting service providers
- (e) providing third parties with information about you to give you access to discounted products and / or services of our third-party partners. Our partners may directly market their products and / or services to you but only where you consent to them doing so;
- (f) ensuring consistency of service across our business and other internal business purposes;
- (g) developing or refining our services as well as tailoring our services;
- (h) notifying you about changes to our Platforms, services, or activities we offer or provide via our Platforms;
- (i) providing you with marketing material or contacting you in relation to our business, networking or promotional activities;

- (j) publishing testimonials you provide us; and
  - (k) internal corporate purposes, corporate governance, auditing and record keeping.
- 6.2 Our use of Personal Information may extend beyond the uses described above in clause 6.1, but will be restricted to purposes that we consider to be related to our functions and activities.
- 6.3 We may disclose your Personal Information as part of a corporate restructure or sale of business; we will however post a notification on our website 14 days prior to any sale or restructure event.

## **7. What do we do with your Personal Information?**

- 7.1 If we collect Personal Information, we may:
- (a) use that information for the purposes stated in this Policy and directly related purposes;
  - (b) store that information in accordance with this Policy;
  - (c) pass that information amongst entities we work with, platform partners, associated organisations, business partners or affiliates;
  - (d) pass that information to third parties who provide products or services to us (including our accountants, auditors, lawyers, IT contractors, and other service providers); and
  - (e) provide that information to third parties as required or allowed by law.

## **8. Do you use my information for Direct Marketing?**

- 8.1 We may use your Personal Information to communicate directly with you to promote our products, services, partners, competitions and activities.
- 8.2 We use direct marketing to provide you with information about our products, competitions and services that we believe you may be interested in. We will also use direct marketing to provide you with information about products and services of third parties that we believe you may be interested in, but only where you consent to us doing so.
- 8.3 If you receive direct marketing material from us, and do not wish to continue receiving it, please contact us by any of the methods stated in this Policy, asking to be removed from all future direct marketing programs. Once we have received your opt-out request, we will remove you from our direct marketing programs as soon as reasonably practicable.

## **9. What about Cookies, pixels and analytics?**

- 9.1 When you access our Platforms, or when you use our products or services, we may receive information about you via automated methods, including (but not limited to) use of a 'cookie', a 'pixel' or from other analytics software.
- 9.2 These are tools that our web server may direct your traffic to, send to your computer, or embed on a website, when you visit our website. These tools help us provide products and services to you, and to recognise when you re-visit the Platform, serve you customised content and to optimize your experience.

- 9.3 We generally don't collect Personal Information through the use of these tools, though we may be able to access your IP address and information about what your computer technology is when using analytical software.
- 9.4 You may be able to change the settings of your browser so that cookies are not accepted generally or that you are provided with options to accept or reject them as they are sent to your browser.

## **10. Do we ever send your information overseas?**

- 10.1 We are an Australian based organisation. We do not disclose or send any Personal Information we collect overseas. In the event that your information is sent overseas, we will use our best endeavours to ensure that any overseas supplier will keep all Personal Information secure.

## **11. Can you access your Personal Information or request it be corrected?**

- 11.1 You may request access to the Personal Information that we hold about you by contacting us. Upon receiving an access request, we may request further details from you to verify your identity.
- 11.2 We reserve the right not to provide you with access to Personal Information if we cannot verify your identity to our reasonable satisfaction. An administrative fee may be charged to cover our costs in providing you with access to your Personal Information. This fee will be explained to you before it has been incurred.
- 11.3 We will respond to your access request within a reasonable period of time by:
  - (a) providing you with access to your Personal Information;
  - (b) rejecting your access request, and providing you reasons for this rejection.
- 11.4 Access requests may be denied where:
  - (a) we believe your request is frivolous or vexatious;
  - (b) we are entitled to reject a request by law;
  - (c) we are unable to verify your identity; or
  - (d) you have not paid the administrative fee (if any).
- 11.5 If you believe that the Personal Information that we hold is inaccurate or otherwise requires correction, you may send us a correction request by contacting us. We will review your Personal Information and respond to the request within a reasonable period of time.

## **12. Sensitive Information**

We will only keep your Sensitive Information whilst you consent to us doing so, or if we are required to by law or to protect a legal right. If you want us to delete your Sensitive Information you may request, we do so in writing. This may, however, limit our ability to serve and assist you.

**13. What happens if you want to deal with us anonymously or using a pseudonym?**

When contacting us, you can do so either anonymously or by using a pseudonym. However, it is not practical nor in some cases, lawful, for us to provide our products and / or services to you if you remain anonymous. You cannot participate in our competitions if you remain anonymous, and we may not be able to investigate incidents or complaints you have made.

**14. Sale or transfer of business**

Where we sell or negotiate the sale of our business to a buyer or prospective buyer we may share your Personal Information with them. We will ensure the confidentiality of your Personal Information is maintained in accordance with this Policy.

In the circumstances where your Personal Information is transferred to the buyer under a sale or becomes subject to a different privacy policy, we will give notice to you by:

- (a) notice posted on our Platforms; or
- (b) by electronic means, either email, text message or other similar method.

You expressly consent to us issuing that notice via such methods.

**15. Does this Policy ever change?**

From time to time, we may make changes to this Policy. When we do, we will highlight those changes in yellow highlight for a period of 14 days. Please make sure you review this Policy each time you visit our website to keep up to date on any changes.

**16. What happens if you have a question or complaint about how we have handled your Personal Information?**

16.1 If you have a question or complaint, you can raise it with us by contacting us at:

Phone: 1300 476 879

Email: [contact@megarewards.au](mailto:contact@megarewards.au)

Post: Privacy Officer: SA – 3/55 Gawler Place Adelaide SA 5000  
WA – 202/37 Barrack Street Perth WA 6000

16.2 We take all complaints seriously and will respond to you within a reasonable period of time, usually 30 days, unless we consider your complaint to be frivolous or vexatious or if we are unable to verify your identity.

16.3 If you are not satisfied with the way we have handled your complaint, you can make a complaint to the Office of the Australian Information Commissioner at <http://oaic.gov.au>.