



Glow International Pty Ltd

Privacy Policy

We understand and appreciate that you may be concerned about your privacy and the confidentiality and security of information we may gain about you online.

We are committed to protecting your privacy and to complying with the Australian Privacy Principles in the Australian Privacy Act.

The purpose of the Privacy Policy ("Privacy Policy") is to outline the Personal Information collected by us and the use of such information. In this Privacy Policy, "Personal Information" means information or opinion about an identified individual, or an individual who is reasonably identifiable in accordance with section 6 of the *Privacy Act 1988 (Cth)*.

By using the Website, you agree to accept the Privacy Policy and the Website Terms of Use ("Terms of Use") [as detailed on the sites Terms & Conditions]. Where the Privacy Policy uses a word starting with a capital letter, that term will be defined in the Terms of Use or elsewhere in this Privacy Policy. If you do not agree to the terms of this Privacy Policy or the Terms of Use, you should not use the Website.

1. Personal Information Collected

We do not collect your personally identifying information unless you knowingly provide the information.

1.1 Individually identifiable information

The types of individually identifiable information we collect will depend on the purposes(s) for which we are collecting it. For example, we may ask for

- (a) your name;
- (b) contact details;
- (c) identification information;
- (d) history records of your communication and interaction with us;

as well as other similar Personal Information that is needed to register or subscribe you to our services or offers. If we ever ask for significantly different information, we will inform you. If you do not provide certain requested Personal Information to us, we may not be able to provide you with access to and use of the Website, provide you with access to our other products and services, or to fulfil on or more of our functions and activities applicable to you.

1.2 Non-identifiable information

Non-identifiable information is data that have never been labelled with individual identifiers or from which identifiers have been permanently removed, and by means of which no specific individual can be identified. When you visit our Website, our company servers may automatically record non-identifiable information that your browser sends. This data may include:

- (a) your computer's IP address;
- (b) browser Type;
- (c) webpage you were visiting before you came to our Website
- (d) the pages within our Website you visit
- (e) the time spent on those pages, items, and information searched on our Website, access times, dates and other statistics.

Non-identifiable information is collected for analysis and evaluation in order to help us improve our Website and the services and products we provide. This data will not be used in association with any other Personal Information.

2. Collection of Personal Information

When we collect Personal Information, it is our usual practice to collect this directly from you. We collect Personally Information that is volunteered during registration of an account at the Website, use and access some parts of the Website, or in response to specific information requests explicitly presented to you, such as:

- (a) Browsing our Website;
- (b) Registering on our Website;
- (c) Logging into the Website once registered;
- (d) Using services we provide on the Website;
- (e) Clicking on Website banners, hyperlinks or plugins; or
- (f) During conversation with our team members.

3. Storing the Personal Information

We use a number of procedures and processes to ensure, where possible, the security and integrity of your Personal Information.

We protect your Personal Information by:

- Restricting access to Personal Information
- Maintaining technology products to prevent unauthorised computer access

We have secured our Site using industry standard technology. Unfortunately, no data transmission over the internet can be guaranteed as completely secure. Once any information is in our possession, we will take reasonable steps to protect that information from misuse, loss, unauthorized access, and modification or disclosure. While we strive to protect such information, we cannot guarantee 100% the security of any information (personal or other) you transmit to us. Therefore, we will not be liable for any breach of security or unintended loss or disclosure of information due to the Website being linked to the Internet.

4. The Purposes of Collecting, Holding, Using and Disclosing Personal Information

4.1 We only collect Personal Information to the extent necessary to fulfil one or more of our functions and activities, and will do so only by fair and reasonable means. We collect your Personal Information so that we can carry out the following actions ("Purpose"):

- (a) to provide you with products and services that you have requested from us;
- (b) to communicate with you, including about products and services provided by us or special offers, and events which might interest you;
- (c) to answer your questions and provide you with information or advice;
- (d) provide your Personal Information to third parties that assist us in providing products and services you have requested;
- (e) carry out administration, marketing, planning, fraud and loss prevention activities, procurement, product and service development, quality control and research to improve the way we and our related bodies corporate and service providers provide products and services to you;
- (f) to consider and respond to complaints made by you;
- (g) to comply with laws or regulations or to comply with any directions given by regulators or authorities.

We will only use your Personal Information for the purposes for which it was collected and we will not otherwise disclose your Personal Information without gaining your consent except where such disclosure is required by law.

4.2 We collect aggregated information about you which informs us about our users. This will allow us to enhance materials viewed by you and services which we offer. The browser information we collect is used in an

aggregated, anonymous manner in our internal analysis of traffic patterns within our Website. This information is used by us to administer and improve our education and training products and services.

5. Third Parties

We engage a range of third parties to provide services and perform business support functions for us. We will provide your Personal Information to those parties in order to provide the services or perform the functions we require.

6. Cross border disclosure

We may disclose Personal Information to overseas recipients, who are located in places such as the United States of America and other countries or jurisdictions depending on the nature of the services those recipients provide to us (for example storing data via a cloud service, or where our customer relationship management system is hosted on servers located overseas, or where delivery address information for online orders is managed via a third party located overseas).

7. Transfer in Certain Circumstances

If there is a sale, merger, consolidation, change in control, transfer of substantial assets, reorganisation or liquidation of Glow International Pty Ltd then, in our sole discretion, we may transfer, sell or assign information collected on and through this Website (including, without limitation, PII and other information), to one or more relevant third parties.

8. Cookies

We use “cookies” when you visit our Site. It is a technology that enables us to operate an efficient service and track the patterns of behaviour of visitors to the Site. There are four main types of cookies – here’s how and why we use them:

- (a) Website functionality cookies – these cookies allow you to navigate the Website and use our features;
- (b) Website analytics cookies – these cookies allow us to measure and analyse how our Customers use the Website, to improve both its functionality and user experience;
- (c) Customer preference cookies – when you are browsing or using our services on the Website, these cookies will remember your preferences (like your language or location), so we can make your user experience as seamless as possible, and more personal to you;
- (d) Targeting or advertising cookies – these cookies are used to deliver ads relevant to you. They also limit the number of times that you see an ad and help us measure the effectiveness of our marketing campaigns.

By using our Website, you agree to us placing these sorts of cookies on your device and accessing them when you visit the Website in the future. You can modify the settings on your device to prevent cookie use. Please note by disabling cookies, your user experience may be affected and you might not be able to take advantage of certain functions of our Website.

9. Access to and Correction of Personal Information

9.1 Under the *Privacy Act*, individuals have a right to access their records. You may ask us in writing to provide you with details of the Personal Information we hold about you. We will endeavour to process your request as soon as practicable.

9.2 You can update or remove your Personal Information, please send us an email to [info@markcarter.com.au].

10. Complaining about a Breach of Privacy

If you wish to exercise any of your rights under this Privacy Policy, have any questions, comments or complaints regarding our practices, or if you are of the view that we have not adhered to this Privacy Policy, you can contact



us by email to [\[info@markcarter.com.au\]](mailto:info@markcarter.com.au). You can find more information about privacy and the protection of your Personal Information on the website of the OAIC at www.oaic.gov.au.

11. Third Party Sites

Please be aware that other websites that may be accessed through our Website may collect your Personal Information. The Website may contain links to other websites. Please note that we are not responsible for the privacy practices of these websites. When you leave our Website, you should familiarise yourself with the privacy statement of that website prior to providing your Personal Information, as this Privacy Policy only applies to Personal Information collected by us or through our Website.

12. Changes to the Privacy Policy

Please note that this Privacy Policy forms part of the Terms of Use and forms part of the agreement between you and us. We may, from time to time, amend the Privacy Policy, in whole or part, in our sole discretion. Any changes to the Privacy Policy will be published on our Website, and will be effective immediately upon the posting of the revised policy on the Website. By continuing to use the Website following any changes, you will be deemed to have agreed to such changes. If you do not agree with the terms of the Privacy Policy, as it may be amended from time to time, in whole or part, you must terminate your use of the Website.

This page was last updated on 7 January 2018



us by email to [info@markcarter.com.au]. You can find more information about privacy and the protection of your Personal Information on the website of the OAIC at www.oaic.gov.au.

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