



mmw3degrees Privacy Policy

Effective Date: this Privacy Statement was last modified on 24 January 2020.

mmw3degrees provides a range of personalised marketing and technology functions on behalf of its clients in both the digital and DM space.

As such we are required to comply with Australian Privacy Act 1988 (Cth) including the Notifiable Data Breaches scheme which came into effect on 22 February 2018.

mmw3degrees is compliant as a 'processor' with the European Union General Data Protection Regulation (EU GDPR) which came into effect on 25 May 2018.

This Privacy Statement provides information as to how mmw3degrees collects, uses and safeguards personal information collected.

Personal Information Collection

Please note that much of the personal information we collect and hold is done so by us when we are acting as the 'agent' or service provider of our client. To enable mmw3degrees to perform the functions outlined in this statement our **clients provide us with personal information** including but not limited to name and address details, email addresses, mobile numbers, bank account details and any other relevant information required. mmw3degrees will comply with our clients requirements in order to allow our clients to be GDPR compliant.

In respect of personal information which is provided to us by our clients, we do seek client assurances that all such personal information has been collected lawfully and in compliance with Australian Privacy Act and EU GDPR and that all required consents have been obtained for, and disclosure statements made in respect of, the intended use of that personal information. mmw3degrees will not be responsible for, and accepts no liability in respect of, any failure by a client to do so.

We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous data or aggregated information about how users use our websites. We do not re-identify this information to turn it into personal information.

Where mmw3degrees is collecting data this will be done ensuring mmw3degrees is compliant at all times with Australian Privacy Act and EU GDPR.

Cookies/Website Tracking

We provide information and services ourselves and on behalf of our clients through a range of online services including websites, apps, email and social media profiles. In some cases we may also collect your personal information through the use of cookies. A cookie is a piece of information that allows the server to identify and interact more effectively with your device. The cookie assists us in maintaining the continuity of your browsing session by enabling us to keep track of products or services you view.

Our systems record a variety of information in relation to interactions with our services. This can include information about software versions used, device identifiers (like IP address), location data, dates, times, file metadata, referring website, data entered and user activity such as links clicked.



We use this to research users' habits so that we can improve our online products and services. Other technologies that may be used with Digital Services include web beacons (which may operate in conjunction with cookies), Flash local stored objects and JavaScript.

Information Use

Personal information is collected and used for the purpose of providing personalised marketing technology functions and performing business functions on behalf of mmw3degrees and its clients such as:

- Assessing the performance of websites to improve relevance and operations
- Provide products and services to you and our clients
- Send communications requested by you and/or our clients
- Update our records and keep your contact details up to date
- Provide access to secure areas of websites
- Process and respond to any complaint made by you

Where you are our employee, we may collect, hold, use and disclose your personal information for all purposes connected with our employment relationship. This includes hiring you, training you, administering your personnel records (including pay and leave records), and managing your performance. We may also use your personal information for other purposes related to those described above, and/or for a purpose for which you would reasonably expect it to be used, as permitted by the applicable Act and EU GDPR.

Disclosure

mmw3degrees does not disclose personal information to any third parties without our client's written consent.

Access and Correction

Access to personal data is restricted. Specified customer and technical support personnel have limited access for the sole purpose of performing services that mmw3degrees is contracted to perform and to address any client queries arising out of the performance of those services.

You can contact our Privacy Officer if you would like details of your personal information which we may hold about you. If you would like your personal information updated, corrected or you wish to exercise your right to be forgotten, it will be necessary to contact our client who provided your information to us to perform our services. We will make every effort to assist you in this regard if necessary.

To ensure the integrity and safety of personal information which we maintain, we will only disclose such information if our internal procedures are satisfied. Depending on the nature of your request, we may ask you to complete a personal information request form. In certain cases we may charge you a fee for this service but we will inform you at the time.

Our Privacy Officer's contact details are: privacy@mmw3degrees.com.au or write to us at the following address:

Privacy Officer
mmw3degrees
2 / 2-6 Orion Rd
Lane Cove NSW 2066
Australia

**Storage and Security of Personal Information**

Personal information is held in secure electronic databases. We use a range of security processes to protect the confidentiality and security of personal information that we hold including limiting access to certain parts of our computer systems to the necessary authorised personnel. After we have completed the required functions on behalf of our clients, data is backed up into secure archive files with access restricted to our authorised personnel.

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

Changes to this Privacy Statement

This Privacy Statement may be amended from time to time if our practices change or to take account of new laws. Please look at the Effective Date at the top of this Privacy Statement to see when this Privacy Statement was last revised. Any changes to this Privacy Statement are effective when this policy is available on our website.

Further Information

If you would like any further information or wish to make a complaint, please contact our Privacy Officer at privacy@mmw3degrees.com.au or mail us at the address above.