

ONE LESS

PRIVACY POLICY

1. Introduction

We are NOT subject to the Australian Privacy Principles (APPs), however, notwithstanding this we have prepared this Policy to set out how we collect, handle and use Personal Information.

We reserve the right to update this Policy at any time without notice.

In certain circumstances we may also be subject to the EU General Data Protection Regulation (Regulation 2016/679) as it applies to residents in the European Economic Area.

2. Purpose

The purpose of this Policy is to:

- a. set out the types of information that we may collect; and
- b. how that information will be used, handled, stored and disclosed.

3. Application

This policy applies to information that we may collect about you, being the Personal Information.

This policy does not apply to information that may be collected by a third party or how that third party may use, handle, store or disclose your information.

4. Definitions

Organisation means a natural person, a body corporate, a partnership, any other unincorporated association, or a trust, that is not a small business operator, a registered political party, an agency, a state, territory or national authority or a prescribed instrumentality of a state, territory or nation.

Personal Information means:

- a. information or an opinion about an identified natural person, or a natural person who is reasonably identifiable;
- b. any content you author and publish on our Service;
- c. Third Party Information; and
- d. Device Information.

One Less, we, us, our means One Less Pty Ltd ACN 630 931 485 and its 'related bodies corporate' (as that term is defined and used in the Corporations Act 2001 (Cth)).

Service means our software application entitled One Less that provides a platform for:

- a. (consumers): to track usage of their reusable cup, track products and promotions and refer friends to the Service; and
- b. (businesses): scan consumers reusable cups to log usage, scan inventory and access reporting features.

5. Legislative Framework

In Australia - Privacy Act 1988 (Cth) which includes the Australian Privacy Principles set out therein, as substituted, amended, replaced or varied from time to time.

In the European Economic Area – for residents in the European Economic Area only, EU General Data Protection Regulation (Regulation 2016/679).

6. Policy

6.1 How, what and why we collect your information

We collect information about you (including, but not limited to, that information set out in the table below) that:

- a. you give us directly (for example when you create an account with our Service or you generate content

and make it available on or via our Service, we collect certain information from you, including your name, mobile number and email address, or other information provided by you when you communicate with us by email or through social media. We refer to this information as “Service Information”;

- b. we receive from other sources (for example information we receive from business partners, sub-contractors in technical and delivery services, advertising networks, analytics providers, search information providers, third party applications that plug into the Service and payment providers/merchants. We refer to this information as “Third Party Information”); and
- c. we collect about you and your device (for example technical information, including the IP address used to connect your computer or mobile phone to the Internet, your login information, your location, application version, browser type and version, time zone setting, browser plug-in types and versions, cookies, operating system, platform and type of device. Additionally, as you use the Service, we collect information about the individual pages that you view and how you interact with the Service. We refer to this automatically collected information as “Device Information”).
- d. We collect Device Information using the following technologies:
 - i. “Cookies” are data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>;
 - ii. “Log files” track actions occurring on the Service, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps; and
 - iii. “Web beacons”, “tags”, and “pixels” are electronic files used to record information about how you browse the Service.

What information do we collect?	Why we might collect this information
Service Information	<ul style="list-style-type: none"> • to identify you; • to provide you access to the Service; • to allow you to upload content you generate to the Service; • to allow you to interact with cafes or consumers (as relevant) on the Service; • to provide you the reports as provided in the Service from time to time; • to fulfil orders placed through our Service (including processing your payment information, arranging for shipping, and providing you with invoices and/or order confirmations); • provide such information to third party logistics entities to transport your order; • to screen orders for potential risk or fraud; • to take appropriate action against you where you are in breach of our Terms of Service; • to communicate with you; • to respond to your requests, questions, comments and complaints; • to send you relevant news, promotion and marketing materials, either initiated by us or a third party; • when in line with the preferences you have shared with us, provide you with information or advertising relating to our products or services; and • any other reason allowed at law.
Third Party Information	<ul style="list-style-type: none"> • to deliver the Service to you; • to provide you the reports as provided in the Service from time to time; • to process (or facilitate in the processing) of any order or purchase you make with us; and • any other reasons allowed at law.

Device Information	<ul style="list-style-type: none"> • to provide you with information about cafes and/or consumers (as relevant); • to provide you the reports as provided in the Service from time to time; • to help us screen for potential risk and fraud; • improve and optimise our Service (for example, by generating analytics about how our users browse and interact with the Service, and to assess the success of our marketing and advertising campaigns); • to provide you with local information and alerts about our products and services, including the Service; • to improve our Service; • to comply with local legal restrictions; • to gather anonymous statistics; • for analytical purposes; • to ensure proper function of the Service; or • any other reason allowed at law.
Your full name, mobile number, email address and other personally identifiable information.	<ul style="list-style-type: none"> • to identify you; • to provide you access to the Service; • to allow you to upload content you generate to the Service; • to allow you to interact with cafes or consumers (as relevant) on the Service; • to provide you the reports as provided in the Service from time to time; • to take appropriate action against you where you are in breach of our Terms of Service; • to communicate with you; • to respond to your requests, questions, comments and complaints; • to send you relevant news, promotion and marketing materials, either initiated by us or a third party; • when in line with the preferences you have shared with us, provide you with information or advertising relating to our products or services; and • any other reason allowed at law.
Information, communication or opinions about any of our products, services, transactions, payment history and business activities.	<ul style="list-style-type: none"> • to publish your reviews, forum posts or other content on our Service (or other website operated by us); • to improve the Service and business activities that we or an Organisation undertake; or • any other reason allowed at law.
Other information.	<ul style="list-style-type: none"> • to provide you with products, services and undertake business activities; • as described to you at the point of collection; or • any other reason allowed at law.

In some situations you will have the option to deal with us anonymously or through a pseudonym, however, where you are requesting products or services from us, it may become impracticable to provide those products or services to you without verifying your identity. Where you fail to provide us information or where the information provided is incomplete and/or inaccurate, or you choose not to provide us with the information that we have requested, it may affect our ability to provide you with our products and services.

In the event that we receive identifiable information from a third party, we will take reasonable steps to ensure that you have given express or implied consent to the collection of that information. If it is determined that we are unable to have possession of the information under a relevant law, we will destroy the information or ensure that the information is de-identified.

6.2 Do Not Track settings

Please note that we do not alter the Service data collection and use practices when we see a Do Not Track signal from your browser.

6.3 Sharing your personal information

- a. We share your Personal Information with third parties to help us use your Personal Information, as described above. For example, we use Google Analytics to help us understand how our customers use the Service -- you can read more about how Google uses your Personal Information here: <https://www.google.com/intl/en/policies/privacy/>. You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>.
- b. Finally, we may also share your Personal Information to comply with applicable laws and regulations, to respond to a subpoena, search warrant or other lawful request for information we receive, or to otherwise protect our rights.

6.4 Behavioural Advertising

- a. As described above, we use your Personal Information to provide you with targeted advertisements or marketing communications we believe may be of interest to you. For more information about how targeted advertising works, you can visit the Network Advertising Initiative's ("NAI") educational page at <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>.
- b. You can opt out of targeted advertising by using the links below:
 - i. Facebook: <https://www.facebook.com/settings/?tab=ads>
 - ii. Google: <https://www.google.com/settings/ads/anonymous>
 - iii. Bing: <https://advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ads>
- c. Additionally, you can opt out of some of these services by visiting the Digital Advertising Alliance's opt-out portal at: <http://optout.aboutads.info/>.

6.5 Storing your information

- a. We are a growing business. In order to offer a consistent service to you we may store and manage data electronically or in paper form. Where data is stored electronically, it is done so by a third party cloud service provider that may store your information or a backup of your information in Australia or such other locations as we determine and disclose from time to time. The data that we collect from you may be transferred to, and be stored to these servers or processed by staff operating in these other jurisdictions.
- b. At the date of this policy, we use CLOUD PROVIDER ("Cloud Provider") as our cloud based server provider. Your personal information will be routed through, and stored on the Cloud Provider servers when using the Service. As we grow and expand the Service, we may require servers in other locations and jurisdictions. If the location of our servers change in the future, we will update this Policy. You should review our Policy regularly to keep informed of any updates.
- c. We will take all steps reasonably necessary to ensure that your information is secured from misuse, interference, loss, unauthorised access, unauthorised modification or unauthorised disclosure. Any information will be handled in accordance with this Policy and applicable privacy laws. Despite using all steps reasonably necessary, the transmission of information through the internet is not completely secure.
- d. Submission of any information to us is an acknowledgement that you agree to such use, storage and disclosure.

6.6 Disclosing your information

We may share your information with:

- a. other users of the Service, in the manner designed in the Service and thereby consented to by you;
- b. the Cloud Provider;
- c. our third party payment providers/merchants;
- d. Apple, Inc;
- e. Google, LLC;
- f. third party applications that interact with the Service;
- g. any of our 'associates' (as that term is defined in section 50AAA of the Corporations Act 2001 (Cth));
- h. third parties including logistic providers, business partners, suppliers and subcontractors;

- i. any prospective buyer of any part of our business or assets; or
- j. where we are required to disclose your information in order to comply with any legal obligation, or in order to enforce any agreements; or to protect the rights, property, or safety of us and our customers, or others. This includes, where relevant, exchanging information with Organisations for the purposes of fraud protection and credit risk reduction.

6.7 Accessing and correcting your information

- a. You may request access to Personal Information that we hold about you at any time by contacting our Privacy Officer using the details set out in this Policy. We will respond to any such request for access to Personal Information within a reasonable time frame and will provide you access to the Personal Information that we hold pertaining to you, unless we are authorised not to do so by law.
- b. We may charge you a reasonable fee for processing your request to access your Personal Information and should we decline you access to your Personal Information, a written explanation will be provided setting out the legal reasoning for doing so.
- c. If upon receiving your Personal Information, or at any other time, you believe the Personal Information that we hold about you is incorrect, out of date, incomplete, irrelevant or misleading, please notify our Privacy Officer using the details set out in this Policy.
- d. If we decline to correct your Personal Information as requested by you, a reason for refusal will be provided except to the extent that it is unreasonable to do so. In the event that we decline the request to correct Personal Information, you may request to associate a statement with the information.

6.8 Complaints

Should you believe that we have not fulfilled our obligations under any relevant law or have not complied with the terms of this Policy or would like to appeal a decision made by us in relation to your Personal Information, you can make a complaint in writing to our Privacy Officer using the contact details set out in this Policy.

We will respond to you within a reasonable period of time (or where a period is specified by any law, that period) to acknowledge your complaint and inform you of the next steps we will take in dealing with your complaint.

In Australia if after getting our response you are still not satisfied that your complaint has been resolved or adequately dealt with, you may direct your complaint to the Australian Information Commissioner (AIC). The contact details of the AIC are listed on their website: www.oaic.gov.au

7. General Data Protection Regulation

7.1 Application

This clause applies to residents in the European Economic Area (EEA) only.

7.2 Your rights

- a. If you are a European resident, you have the right to access personal information we hold about you and to ask that your Personal Information be corrected, updated, or deleted. If you would like to exercise this right, please contact us through the contact information below.
- b. Additionally, if you are a European resident we note that we are processing your information in order to fulfil the contract we have with you, by way of the Terms of Service, or otherwise to pursue our legitimate business interests listed above. Additionally, please note that your information will be transferred outside of Europe.

7.3 Data retention

When you create an account with our Service, we will maintain your Personal Information for our records unless and until you ask us to delete this information.

7.4 Minors

Our Service is not intended for individuals under the age of 16.

8. Contact

If you have any comments, concerns or questions regarding this Policy or Personal Information that we hold about you, please contact our Privacy Officer by email to privacy@oneless.com.au or by post at:

Privacy Officer
One Less Pty Ltd
Shop 2, 333 Pacific Highway
NORTH SYDNEY NSW 2060