



# Spin Golf Pty Ltd – Privacy Policy

## Privacy Policy

*Effective December 2014*

Thank you for visiting the Privacy Policy page of Spin Golf Pty Ltd (“**Spin Golf**”, “**we**”, “**us**” or “**our**”). We recognise and value your right to privacy and are committed to protecting your personal information. Personal information is information or an opinion about you. This page describes our policy with regard to online privacy and explains how we handle your personal information for purposes relating to providing our services.

Spin Golf adheres to the Australian Privacy Principles contained in the *Privacy Act 1988 (CTH)* as amended from time to time.

Words appearing in *italics* are as defined and provided for in the *Spin Golf Terms and Conditions*, which can be found on the *Spin Golf Website*. These *Terms and Conditions* apply to and are legally binding for every *Spin Golf Competitor* and it is important for them to read and understand them

### 1. Your acceptance

By visiting, using, and/or registering on the *Spin Golf Website*, you provide your agreement to the terms and conditions of this Privacy Policy (as amended from time to time) and consent for Spin Golf to use and/or disclose your information in particular ways.

Your use of the *Spin Golf Website* after any such changes will remain subject to the current terms of the Privacy Policy.

### 2. Why we collect, hold, use and disclose personal information

We collect, hold, use and disclose personal information for purposes relating to our activities. For example, we may collect, hold, use and disclose your personal information for several purposes, including:

- (i) providing you with our services that you require;
- (ii) managing our customer relationship with you;
- (iii) providing you with information about our services;
- (iv) marketing or promoting our services;
- (v) evaluating or enhancing our services;
- (vi) maintaining or developing our services;
- (vii) carrying out our activities; and
- (viii) complying with our legal or regulatory obligations.



### **3. What type of personal information do we collect and use?**

Whenever you register with Spin Golf, send us an email, redeem products from the *Spin Golf Website*, enter into a contest, subscribe to one of our newsletters, or otherwise transmit information via the *Spin Golf Website* or *Company* social media sources, we may obtain and collect personally identifiable contact information (expressed herein generally as "personal information") such as your name, date of birth, email address, mailing address.

Spin Golf will not use this personal information unless we need the information in relation to the services, functions or activities for which you provided your consent and in accordance with any other use you have permitted or as may be set out in this Privacy Policy.

### **4. What kinds of personal information our payment provider collects**

We use [Braintree](#) (owned by PayPal) as our payment provider and as such we do not collect or hold any of your credit card details. The kinds of personal information that Braintree may collect and hold include your credit card and other payment related information, which is necessary to process a payment transaction when you purchase an *Entry Option* through the *Spin Golf Website*. Braintree does not disclose to us any of your payment related personal information that it collects for the purpose of processing a payment transaction. Braintree handles all payment related personal information that it collects in accordance with PayPal's Privacy Policy (see [www.paypal.com/au/webapps/mpp/ua/privacy-full](http://www.paypal.com/au/webapps/mpp/ua/privacy-full)).

### **5. What kinds of website visitor information we collect**

We collect and hold information about visitors to the *Spin Golf Website* using a range of third party tools including tracking "cookies". Cookies assist us in tracking which of our features you like best and what content you may have viewed during past visits. When you re-visit the *Spin Golf Website*, cookies can enable us to customize our content according to your preferences. We may use cookies to:

- keep count of return visits to the *Spin Golf Website*;
- accumulate and report anonymous, aggregate, statistical information on website usage;
- deliver content specific to your interests or past viewing history; and
- save your password so you don't have to re-enter it each time you visit our websites.

You can also disable cookies. By modifying your browser preferences, you can accept or reject all cookies, or request a notification when a cookie is set (your browser's help screen or manual should tell you how to do this). However, if cookies

are disabled in your browser, certain parts of the *Spin Golf Website* may not work correctly as they are reliant on the use of cookies to operate effectively.

## **6. How we disclose personal information**

Spin Golf may need to disclose your personal information to third parties. The most common reason for Spin Golf disclosing information to third parties is for when we use service providers to perform functions on our behalf. We will only disclose your information if it is necessary for the purpose of performing our services, functions or activities.

For example, we may disclose your personal information to our service providers in order to assist us to carry out our activities, including our information technology providers, sales and marketing providers, advertising providers, gift voucher and product providers, payment gateway provider and billing and debt recovery providers.

These third parties may be located in Australia or other countries including the United States. We will not disclose your personal information to any other third parties without your consent except where required or authorised by law. We will never sell, trade or rent your personal information to any third party for marketing purposes without your consent.

## **7. Security**

Spin Golf uses physical, electronic and managerial security measures to protect the loss, misuse and alteration of information under our control.

We use Secure Socket Layer ("SSL") connections with 128-bit encryption for certain transactions and confidential data. When you use a secure browser, all information you submit via the browser is delivered to us over the Internet in an encrypted form. Every secure page uses a digital certificate issued by Comodo, a third-party certification authority. A "site certificate" sits on all secure pages. To view this certificate, click on the image of the closed lock or the solid key on the bottom bar of your browser window (location of this lock or key will differ depending on your browser).

We monitor system and application activity logs to identify any unusual activity from authorised and/or unauthorised individuals accessing our systems and/or making changes to stored information. We regularly perform preventative system maintenance and monitoring to ensure the security of our data systems.

Unfortunately, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, Spin Golf cannot ensure or warrant the security of any information you transmit, and you do so at your own risk. Once we receive your transmission, we make our best effort to ensure its security on our

systems. You can report network abuse and any risk of security violations to us by emailing [privacy@spingolf.com.au](mailto:privacy@spingolf.com.au).

### **8. Queries, access and correction**

If you believe that the personal information that we hold is inaccurate, incomplete or out-of-date, you should contact us. You may request access to, and correction of, any of your personal information that we hold. You will be required to verify your identity before you will be permitted to access, correct or update any of your personal information that we hold. If you have any queries about this Privacy Policy, please contact us using the details below.

### **9. Updates to this Privacy Policy**

We may update this Privacy Policy from time to time to take into account changes in our information handling practices by publishing an updated version of this Privacy Policy on the *Spin Golf Website*. You should regularly review the most recent version of this Privacy Policy made available at [www.spingolf.com.au](http://www.spingolf.com.au).

### **10. Contact information**

If you have questions or concerns regarding this Privacy Policy, please contact us at [privacy@spingolf.com.au](mailto:privacy@spingolf.com.au).