

Wellcom Group Limited – Privacy Policy

Wellcom Group Limited (Wellcom) and its related group of companies and associated bodies (**us, we, our**) maintain a policy of strict confidence concerning your (**you, your**) personal information (**Privacy Policy**). This Privacy Policy has been developed in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**). This Policy applies to the collection, storage, use and dissemination of your personal information. By accessing this site www.wellcomworldwide.com or any site of our group of companies (**Site**) or otherwise transacting with us you accept the terms of this Privacy Policy. This Privacy Policy applies to information provided to us whether via the Site or any other means.

1. Collecting Personal and Non-Personal information

Personally Identifiable Information Collected by Wellcom

Wellcom may collect and store personally identifiable information about you if you voluntarily submit such information to Wellcom. Personally identifiable information may include your name, email address, physical address and other information that specifically identifies you.

Non-Personally Identifiable Information Collected by Wellcom

Wellcom may also automatically collect (through cookies, described below, and other methods) and store aggregate or anonymous information about user contact with and use of the Site. Examples of this type of information include demographic information, the type of internet browser you are using, the type of computer operating system application software and peripherals you are using, the domain name of the web site from which you linked to our Site and your browsing habits on and usage of the Site. Non-Personally identifiable information may also include personally identifiable information that has been aggregated so that no one individual is specifically identifiable (such as, how many users in a particular city access the Site).

2. Cookies

We may use cookies and similar technologies to collect non-personally identifiable information from you and to customize your use of the Site. A cookie is a small data file that certain web sites write to your hard drive when you visit them. We may also use pixel tags, clear gifs and similar technologies that collect data similar to that collected by a cookie. A cookie file can contain various types of information, including a user ID that the site uses to track the pages you have visited.

Most browsers are initially set up to accept cookies; however, you can reset your browser to refuse all cookies or indicate when a cookie is being sent or you can flush your browser of cookies from time to time. (Note: you may need to consult the help area of your browser application for instructions.) If you choose to disable cookies or refuse to accept a cookie, you may not be able to utilize all features of the Site.

At times, some of our advertisers and their ad service providers set cookies when you click their advertising banners. While we use cookies in other parts of the Site (as discussed above), cookies received with banner ads are collected by those advertisers and their ad service providers. The advertiser's privacy policy and/or that of its service provider will govern the use of this information and Wellcom is not responsible for the privacy practices of such advertiser or ad service provider.

3. Use and disclosure of information

Your personal information may be used by us in a number of ways, including to:

- provide the products and services offered on the Site and in any other forum to you;
- enhance and improve your use of the Site and our products and services;
- respond to any questions, comments or queries submitted on the Site or by any other means;
- disperse marketing materials and keep you informed about new products, initiatives and opportunities;
- for internal business purposes, for example, to research and develop the Site and our other products and services; and
- as required or authorised by law, including under the Australian Privacy Principles.

We will not disclose information that personally identifies you to any third party other than as set out in this Privacy Policy.

4. Direct marketing

We may use personal information about you for the primary purpose of providing you with our services. We may also use it for other purposes for which you might reasonably expect us to use that information. This includes sending you information about new developments, products, services and special offers by post, telephone or any form of electronic communication. We may also contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases your personal information is not transferred to the third party. You authorise us to use any email address or other contact information you provide to use at any time for such above purposes.

5. Accuracy of your information

We take reasonable steps to ensure that the personal information held by us is accurate, complete and up to date. If you believe that any of your personal information is inaccurate, please contact us and we will take reasonable steps to correct it.

6. Third parties and your information

This Site may link directly to website operated by third parties (**Linked Sites**). You acknowledge that Linked Sites are not operated by us. We encourage you to always read the applicable privacy policy of any Linked Site. We are not responsible for the content or practices of the Linked Sites or their privacy policies regarding the collection, storage, use and dissemination of your personal information.

7. Your consent

By your use of the Site and our services, you consent to the collection, storage, use and dissemination of your personal information in accordance with this Privacy Policy and as otherwise permitted under the Privacy Act.

8. Opt-Out Procedures

You have the option to opt-out of receiving information from Wellcom. Wellcom also gives you the option to remove your information from its database of active users. If you no longer wish to

take advantage of this Site or to receive any form of direct contact from Wellcom, whether it is email, newsletters, or other promotional offers or materials, or wish us to delete your personally identifiable information from our database of active users, please send a request to our Web Administrator at enquiries@wellcomworldwide.com.

9. Storage and Security

Wellcom is committed to taking reasonable steps to ensure the security of the data that we collect from you. We have detailed procedures in place to ensure that personal information is securely stored, that only authorised staff has access to it, that it remains confidential and is only used for appropriate purposes.

Our internal network, databases and web environment are protected from unauthorised access using current technologies. Wellcom continuously reviews and implements appropriate technical advances to safeguard personal information.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

10. Variation and consent to variation

We may vary the terms of this Privacy Policy at any time. You should check this Privacy Policy so that you are aware of any variations made to this Privacy Policy. You will be deemed to have consented to such variations by your continued use of the Site or our services following such changes being made.

Policy Effective 1st January 2014