

Milvos Pty Limited Privacy Policy

In this privacy policy, 'we', 'us' and 'our' means Milvos Pty Limited (ACN 604 062 348) and 'Service' means the 1Q1 vehicle body repair management and tracking service including the software, app and website.

This privacy policy sets out how we collect, store, use and disclose your personal information.

By providing us with your personal information, you consent to your personal information being collected, stored, used and disclosed as set out in this privacy policy.

What personal information we collect

1. 'Personal information' is information or an opinion about an identified living individual or an individual who is reasonably identifiable (e.g. a name and contact details or bank account details).
2. The personal information we collect and hold generally includes:
 1. *if you are getting your vehicle repaired through an insurance claim with one of our insurance partners:* your name and contact information (being telephone number, email address and postal address), information relating to your vehicle (including registration, model and make) and information relating to your insurance claim (being the claim number and the name of your insurer). Throughout our provision of the Service to you, we may collect and hold additional personal information about you. This could include a record of requests, queries or complaints you make;
 2. *if you are getting your vehicle repaired other than through an insurance claim:* your name and contact information (being telephone number, email address and postal address) and information relating to your vehicle (including registration, model and make). Throughout our provision of the Service to you, we may collect and hold additional personal information about you. This could include a record of requests, queries or complaints you make; and
 3. *if you are working for one of the repairers:* your name and contact details.
3. We may also collect other information required to provide the Service.

How we collect your personal information

4. We may collect your personal information in a number of ways, including:
 1. *if you are getting your vehicle repaired through an insurance claim:* from your insurer or your repairer via the Service;
 2. *if you are getting your vehicle repaired other than through an insurance claim:* from your repairer via the Service; and
 3. *if you are working for one of the repairers:* from the repairer.

Your obligations when you provide us with the personal information of others

5. You must not provide us with personal information of any other individual, including:
 1. *if you are an insurer,* your insured customer's details;
 2. *if you are a repairer,* the details of the people who work for you,

unless you have the express consent of that individual to do so. If you do provide us with such information about another individual, before doing so you:

3. must tell that individual that you will be providing their information to us and that we will handle their information in accordance with this privacy policy;
4. must provide that individual with a copy of (or refer them to) this privacy policy; and
5. warrant that you have that individual's consent to provide their information to us.

The purpose for collecting your personal information and how we use it

6. We collect and use your personal information for the purpose of providing the Service and directly related purposes. Such purposes include:
 1. providing repairers, insurers, people getting their vehicles repaired and others with the Service and benefits;
 2. helping to develop and identify products and services that may interest repairers, insurers, people getting their vehicles repaired or others;
 3. facilitating communications regarding the status of repairs, between:
 - 3.1. a repairer and a person getting their vehicle repaired;
 - 3.2. the repairer and the relevant insurer (for a person whose vehicle is being repaired through an insurance claim);
 4. conducting market or customer research;
 5. telling you about our other service offerings which we believe may be relevant (if you have requested to receive this);
 6. providing consultancy services to third parties relating to vehicle repairs services; or
 7. any other purpose notified to you at the time your personal information is collected.
7. We may also use your information to comply with legislative or regulatory requirements in any jurisdiction, prevent fraud, crime or other activity that may cause harm in relation to the Service.
8. We will not use your personal information other than as set out in this privacy policy or as required or permitted by law.

Disclosure of your personal information

9. Where appropriate, we will disclose your personal information to insurers, repairers and people who work for the repairers.
10. We may also disclose any of the personal information we collect to our advisers such as lawyers and accountants, our related entities and our external service providers such as IT providers (on a confidential basis).
11. We will not otherwise disclose your personal information other than when required or permitted by law. In addition, if we disclose your personal information to external service providers overseas, we will take reasonable steps to ensure that they comply with the *Privacy Act 1988* (Cth).
12. Nothing in this privacy policy prevents us from using and disclosing to others de-personalised aggregated data.

Your obligations when we disclose personal information to you

13. If we give you or provide you access to the personal information of any individual in connection with our Service, you must only use it:

1. for the purposes we have specified; and
 2. in compliance with the requirements of applicable privacy laws, including the Australian Privacy Principles set out in the *Privacy Act 1988* (Cth) and this privacy policy.
14. You must also ensure that your representatives, agents, employees and contractors meet the above requirements.

Accuracy, access and correction of your personal information

15. We take reasonable steps to ensure that your personal information is accurate, complete and up-to-date whenever we collect, use or disclose it. However, we also rely on you to advise us of any changes to your personal information.
16. Please let us know as soon as possible if there are any changes to your information or if you believe the information we hold about you is not accurate, complete or up-to-date.
17. If you make a request by contacting us at the contact details below, we will provide you with access to the personal information we hold about you unless otherwise required or permitted by law. We will notify you of the basis for any denial of access to your personal information.

Security of your personal information

18. We take reasonable steps to protect any personal information that we hold from misuse, interference and loss and from unauthorised access, alteration and disclosure. For example, we maintain physical security over our paper and electronic data stores and premises such as locks and security systems which are encrypted for when data is in transit only. We also maintain computer and network security; for example, by authenticating every connection between a mobile or internet browser and the server, and by using firewalls (security measures for the Internet) and other security systems such as user identifiers and passwords to control access to computer systems.
19. However, data protection measures are never completely secure and, despite the measure we have put in place, we cannot guarantee the security of your personal information. You must take care to ensure you protect your personal information (for example, by protecting any usernames and passwords). You should notify us as soon as possible if you become aware of any security breaches.

How to make a complaint

20. If you wish to make a complaint about a breach of this privacy policy or under the *Privacy Act 1988* (Cth), you can contact us using the contact details below. You will need to provide us with sufficient details regarding your complaint together with any supporting evidence and information.
21. We will refer your complaint to our Privacy Officer who will investigate the issue and determine the steps (if any) that we will undertake to resolve your complaint. We will contact you if we require any additional information from you and will notify you in writing of the outcome of the investigation. We will try to resolve any complaint within 14 working days. If this is not possible, you will be contacted within that time to let you know how long it should take us to resolve your complaint.
22. If you are not satisfied with our determination, you can contact us to discuss your concerns or complain to the Australian Privacy Commissioner via www.oaic.gov.au.

How to contact us

23. If you wish to gain access to your personal information, want us to correct or update it or you have a complaint about a breach of your privacy or any other query relating to this privacy policy, please contact us during business hours on:

Attention: Privacy Officer, Paul Smith

Milvos Pty Ltd
Address: PO Box 1704, Midland, WA 6056
Email: paul@milvos.com

24. No fee will be charged by us for an access request. However, you may be charged the reasonable cost of complying with the access request.

NOTE: For further information on privacy, visit the Federal Privacy Commissioner's website at: <http://www.privacy.gov.au>

Dated: December 2015