

# **Starr Group Pty Ltd - Privacy Policy**

This privacy policy is applicable to all the users who use 'Starr Group Pty Ltd' products (Starr365.com, Starr365, Mech365, Manager365, Staff365, Starr GEO, Starr PRO, Link365) directly or indirectly.

## **1. We respect your privacy**

1.1 Starr Group Pty Ltd respects your right to privacy and is committed to safeguarding the privacy of our customers and website visitors. We adhere to the Australian Privacy Principles contained in the Privacy Act 1988 (Cth). This policy sets out how we collect and treat your personal information.

1.2 "Personal information" is information we hold which is identifiable as being about you.

## **2 Collection of personal information**

2.1 Starr Group Pty Ltd will, from time to time, receive and store personal information you enter onto our website (starr365.com) or mobile apps (Link365 / Starr PRO / Starr GEO), provided to us directly or given to us in other forms.

2.2 Personal Data means information that can be associated with an identified or identifiable person. "Personal Data" can include name, postal address (including billing and shipping addresses), telephone number, email address, payment card number, other financial account information, account number, date of birth, and government-issued credentials (e.g., driver's licence number, national ID, Visa or passport).

2.3 You may provide basic information such as your name, phone number, address and email address to enable us to send information, provide updates and process your product or service order. We may collect additional information at other times, including but not limited to, when you provide feedback, when you provide information about your personal or business affairs, change your content or email preference, respond to surveys and/or promotions, provide financial or credit card information, or communicate with our customer support.

2.3 Additionally, we may also collect any other information you provide while interacting with us directly or through our website and mobile applications.

## **3. Sensitive Information**

3.1 Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information. Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law.

## **4. Use of your personal information**

4.1 .Starr Group Pty Ltd may use personal information collected from you to provide you with information, updates and our services. We may also make you aware of new and additional products, services and opportunities available to you. We may use your personal information to improve our products and services and better understand your needs.

4.2 Starr Group Pty Ltd may contact you by a variety of measures including, but not limited to telephone, email, sms, mobile app notification or mail.

4.3 Starr Group Pty Ltd will share stored information with other linked service providers.

## **5. Disclosure of your personal information**

5.1 .We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this Policy. Personal information is only supplied to a third party when it is required for the delivery of a service.

5.2 . We may from time to time need to disclose personal information to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, in the course of a legal proceeding or in response to a law enforcement agency request.

5.3 We may also use your personal information to protect the copyright, trademarks, legal rights, property or safety of Starr Group Pty Ltd, starr365.com, its customers or third parties.

5.4 Information that we collect may from time to time be stored, processed in or transferred between our servers located in different locations.

5.5 If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our user databases, together with any personal information and non-personal information contained in those databases. This information may be disclosed to a potential purchaser under an agreement to maintain confidentiality. We would seek to only disclose information in good faith and where required by any of the above circumstances.

5.6 By providing us with personal information, you consent to the terms of this Privacy Policy and the types of disclosure covered by this Policy. Where we disclose your personal information to third parties, we will request that the third party follow this Policy regarding handling your personal information.

## **6 Security of your personal information**

6.1 We do not rent, sell, or share Personal Information about you with other people or non-affiliated companies except to provide products or services you've requested, when we have your permission, or under the following circumstances:

- (i) as may be necessary to perform internal analyses and business functions;
- (ii) as part of a business transfer; or
- (iii) when required by law or permitted to protect our rights, property, or safety.

6.2 Starr Group Pty Ltd is committed to ensuring that the information you provide to us is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

6.3 The transmission and exchange of information is carried out at your own risk. Neither us nor any other service provider guarantee the security of any information that you transmit to us. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that personal information that we collect will not be disclosed in a manner

that is inconsistent with this Privacy Policy. You are solely responsible for your data. Starr Group Pty Ltd, associated service providers or any other user is not responsible for any such incident.

## **7 Access to your personal information**

7.1 You may request details of personal information that we hold about you in accordance with the provisions of the Privacy Act 1988 (Cth). A small administrative fee may be payable for the provision of information. If you would like a copy of the information, which we hold about you or believe that any information we hold on you is inaccurate, out of date, incomplete, irrelevant or misleading, please email us at [info@starr365.com](mailto:info@starr365.com).

7.2 We reserve the right to refuse to provide you with information that we hold about you, in certain circumstances set out in the Privacy Act.

## **8. Maintaining the Quality of your Personal Information**

8.1 It is important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

## **9. Complaints about privacy**

9.1 If you have any complaints about our privacy practices, please feel free to send in details of your complaints to [info@starr365.com](mailto:info@starr365.com). We take complaints very seriously and will respond shortly after receiving written notice of your complaint.

## **9. Changes to Privacy Policy**

9.1 Please be aware that we may change this Privacy Policy in the future. We may modify this Policy at any time, in our sole discretion and all modifications will be effective immediately upon our posting of the modifications on our website or notice board. Please check back from time to time to review our Privacy Policy. We will notify you through your registered email regarding the change in the policy.

## **10 Website**

10.1 When you visit our website, [starr365.com](http://starr365.com) or mobile app (Starr GEO / Starr PRO / Link365), we may collect certain information such as browser type, operating system, website visited immediately before coming to our site, etc. This information is used in an aggregated manner to analyse how people use our site, such that we can improve our service.

10.2 . Cookies We may from time to time use cookies on our website. Cookies are very small files which a website uses to identify you when you come back to the site and to store details about your use of the site. Cookies are not malicious programs that access or damage your computer. Most web browsers automatically accept cookies but you can choose to reject cookies by changing your browser settings. However, this may prevent you from taking full advantage of our website. Our website may from time to time use cookies to analyses website traffic and help us provide a better website visitor experience.

10.3 Our site may from time to time have links to other websites not owned or controlled by us. These links are meant for your convenience only. Links to third party websites do not constitute sponsorship or endorsement or approval of these websites. Please be aware that Starr Group Pty Ltd is not responsible for the privacy practises of other such websites. We encourage our users to be aware, when they leave our website, to read the privacy statements of each and every website that collects personal identifiable information.

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