

PRIVACY POLICY

ES EM GEE PTY LTD, is committed to respect your privacy and to comply with applicable data protection and privacy laws. This privacy policy ("Policy") describes how we collect and use personal data where ES EM GEE PTY LTD is the data controller or where we refer to the applicability of this Policy. "Personal data" means information relating to you or another identifiable individual.

We will give you additional privacy information that is specific to a product or service in Supplements to this Policy and other notices you may see while using our products or services. If there is a difference between such notices and this Policy, the notices should be considered first.

Software on your device may access your information. Our products or services may contain links to other companies' websites and services that have privacy policies of their own. ES EM GEE PTY LTD is not responsible for the privacy practices of others and we recommend you read their privacy notices.

If you do not agree with this Policy, do not use our products and services or provide ES EM GEE PTY LTD with your personal data.

What information do we collect?

We collect your personal data and other information when you make a purchase, use or register into our products and services, take part in campaigns or research or otherwise interact with us. This includes following categories:

Product and service activations

ES EM GEE PTY LTD products and services may require electronic activation, where your device and application type, as well as unique device, application, network and subscription identifiers are sent to ES EM GEE PTY LTD.

Use of products and services

When you access our services online, our web servers automatically create records of your visit. These records typically include IP-address, access times, the sites linked from, pages visited, the links and features used, the content viewed or requested, browser or application type, language and other such information. See also our **Cookie Policy** below.

Our applications may contact our servers periodically, for example to check for updates or to send us information relating to service usage. Additionally, we may invite you to join voluntary product and service improvement or research programs where detailed information is collected. See Supplements to this Policy for more details.

Information you provide us with

When you create an account, make a purchase, request services, participate in research or campaigns or otherwise interact with us, we may ask for information such as your name, email address, phone number, street address, user names and passwords, feedback, information relating to your devices, age, gender, and language, bank account number, credit card details and other such financial information.

We also maintain records of your consents, preferences and settings relating to, for example, location data, marketing and sharing of personal data.

Your transactions with us

We maintain records of your purchases, downloads, the content you have provided us with, your requests, agreements between you and ES EM GEE PTY LTD, the products and services provided to you, payment and delivery details, your contacts

and communications and other interactions with us. We may, in accordance with applicable law, record your communication with our customer care or with other such contact points.

Positioning and Location data

Location-based services establish location through the use of satellite, mobile, Wi-Fi or other network based positioning methods. These technologies may involve exchanging your location data and unique device and mobile, Wi-Fi or other network related identifiers with ES EM GEE PTY LTD. Our products may operate on multiple device platforms, applications and services which may also collect your location data. We do not use this information to identify you personally without your consent. When you use our location based services and features, for example location based search, navigation and routing, or request for map data, your location data is sent to ES EM GEE PTY LTD to serve you with the right content, which may also include location based advertising.

Why do we process Personal Data?

ES EM GEE PTY LTD may process your personal data for the following purposes. One or more purposes may apply simultaneously.

Providing products and services

We may use your personal data to provide you with our products and services, to process your requests or as otherwise may be necessary to perform the contract between you and ES EM GEE PTY LTD, to ensure the functionality and security of our products and services, to identify you as well as to prevent and investigate fraud and other misuses.

Accounts

Some services may require an account to help you manage your content and preferences. For more information, see our account supplement.

Developing and managing products and services

We may use your personal data to develop and manage our products, services, customer care, sales and marketing. We may combine personal data collected in connection with your use of a particular ES EM GEE PTY LTD product and/or service with other personal data we may have about you, unless such personal data was collected for a different purpose.

Communicating with you

We may use your personal data to communicate with you, for example to inform you that our services have changed or to send you critical alerts and other such notices relating to our products and/or services and to contact you for customer care related purposes.

Marketing, advertising and making recommendations

We may contact you to inform you of new products, services or promotions we may offer and to conduct market research when we have your consent or it is otherwise allowed. We may use your personal data to personalize our offering and to provide you with more relevant services, for example, to make recommendations and to display customized content and advertising in our services. This may include displaying ES EM GEE PTY LTD and third party content.

Do we share Personal Data?

We do not sell, lease, rent or otherwise disclose your personal data to third parties unless otherwise stated below.

Your consent and social sharing services

We may share your personal data if we have your consent to do so. Some services may allow you to share your personal data with other users of the service or with other services and their users. Please consider carefully before disclosing any personal data or other information that might be accessible to other users.

ES EM GEE PTY LTD companies and authorized third parties

We may share your personal data with other ES EM GEE PTY LTD companies or authorized third parties who process personal data for ES EM GEE PTY LTD for the purposes described in this Policy. This may include for example billing through your network service provider or otherwise, delivery of your purchases, providing services including customer service, managing and analyzing consumer data, credit checks, conducting research and managing marketing and other such campaigns. When you purchase an ES EM GEE PTY LTD product from us with a network service provider plan, we may need to exchange information with your network service provider to provide you with such service.

We may conduct joint marketing and other communications with our partners, for example your mobile operator. To avoid duplicate or unnecessary communications and to tailor the message to you we may need to match information that ES EM GEE PTY LTD has collected with information that the partner has collected where this is permitted by law.

These authorized third parties are not permitted to use your personal data for any other purposes. We require them to act consistently with this Policy and to use appropriate security measures to protect your personal data.

International transfers of personal data

Our products and services may be provided using resources and servers located in various countries around the world. Therefore your personal data may be transferred across international borders outside the country where you use our services, including to countries outside the European Economic Area (EEA) that do not have laws providing specific protection for personal data or that have different legal rules on data protection, for example, the United States of America. In such cases we ensure that there is a legal basis for such a transfer and that adequate protection for your personal data is provided as required by applicable law, for example, by using standard agreements approved by relevant authorities (where necessary) and by requiring the use of other appropriate technical and organizational information security measures.

Mandatory disclosures

We may be obligated by mandatory law to disclose your personal data to certain authorities or other third parties, for example, to law enforcement agencies in the countries where we or third parties acting on our behalf operate. We may also disclose and otherwise process your personal data in accordance with applicable law to defend ES EM GEE PTY LTD's legitimate interests, for example, in civil or criminal legal proceedings.

Mergers and Acquisitions

If we decide to sell, buy, merge or otherwise reorganize our businesses in certain countries, this may involve us disclosing personal data to prospective or actual purchasers and their advisers, or receiving personal data from sellers and their advisers.

How do we address the privacy of children?

ES EM GEE PTY LTD products and services are typically intended for general audiences. ES EM GEE PTY LTD does not knowingly collect information of children without the consent of their parents or guardians. ES EM GEE PTY LTD publishes safety guidelines for using internet services in our websites.

How do we address Data Quality?

We take reasonable steps to keep the personal data we possess accurate and to delete incorrect or unnecessary personal data.

We encourage you to access your personal data through your account from time to time to ensure that it is up to date.

What steps are taken to safeguard Personal Data?

Privacy and security are key considerations in the creation and delivery of our products and services. We have assigned specific responsibilities to address privacy and security related matters. We enforce our internal policies and guidelines through an appropriate selection of activities, including proactive and reactive risk management, security and privacy engineering, training and assessments. We take appropriate steps to address online security, physical security, risk of data loss and other such risks taking into consideration the risk represented by the processing and the nature of the data being protected. Also, we limit access to our data bases containing personal data to authorized persons having a justified need to access such information.

How do we use Cookies and Web Beacons?

ES EM GEE PTY LTD uses cookies, web beacons and other similar technologies to operate and improve our websites and offering. We also use cookies for personalization and to display ads. Some ES EM GEE PTY LTD websites use third party advertising technologies, such as AdMob, to serve ads.

Our domains may include third party elements that set cookies on behalf of a third party, for example relating to third party social network. Please see our Cookie Policy below to find out more about how ES EM GEE PTY LTD uses cookies and how you can disable cookies by browser settings or otherwise.

What are your rights?

You have a right to know what personal data we hold about you. You have a right to have incomplete, incorrect, unnecessary or outdated personal data deleted or updated. You have a right to unsubscribe from direct marketing messages and to request that we stop processing your personal data for direct marketing purposes or on other compelling legal grounds. However, if you opt-out from marketing and other communications from ES EM GEE PTY LTD, critical alerts may still be sent to you. You may exercise your rights by contacting us or by managing your account and choices through available profile management tools on your device and our services. In some cases, especially if you wish us to delete or stop processing your personal data, this may also mean that we may not be able to continue to provide the services to you.

Who is the controller of your Personal Data?

ES EM GEE PTY LTD of 105 Mawson Road Meadows, South Australia, is the controller of your personal data.

In addition, the ES EM GEE PTY LTD affiliate providing the product or service may be a controller of your personal data. You may find the identity of the controller and its contact details by reviewing the terms and conditions of such a product or service or by using contact information provided in the applicable ES EM GEE PTY LTD websites.

In matters pertaining to ES EM GEE PTY LTD's privacy practices you may also contact us at:

ES EM GEE PTY LTD
105 Mawson Rd,
Meadows,
South Australia, 5165

Changes to this Privacy Policy

ES EM GEE PTY LTD may from time to time change this Policy or change, modify or withdraw access to this site at any time with or without notice. However, if this Policy is changed in a material, adverse way, ES EM GEE PTY LTD will post a notice advising of such change at the beginning of this Policy and on this site's home page for 30 days. We recommend that you re-visit this Policy from time to time to learn of any such changes to this Policy.

COOKIES POLICY

Cookies and how we use them

This policy details how ES EM GEE PTY LTD uses cookies and cookie-like files and technologies on its websites, e.g. Local Shared Objects, also known as "Flash cookies", web beacons etc. We refer to these generically as "cookies". If you visit our websites and your browser settings accept cookies, we consider this as acceptance of our use of cookies.

What are cookies and how do they work?

Cookies are small files that are sent to and stored in your computer by the websites you visit. Cookies are stored in your browser's file directory. Next time you visit the site, your browser will read the cookie and relay the information back to the website or element that originally set the cookie.

Why does ES EM GEE PTY LTD use cookies?

At ES EM GEE PTY LTD domains, we use cookies to offer you a smoother experience. View your options for managing cookies in the next chapter.

Basic functions

These cookies are essential for running our web sites and are the key to providing you a seamless experience.

You can navigate uninterrupted e.g. by remembering language and country choices you've made and by preserving authentication to secure parts of the domain. These cookies also remember products of interest when you are redirected to an Operator site for a possible purchase.

Site improvement

These cookies enable us to improve our websites by looking at how they are used. We do analytical profiling to understand e.g. unique users reading a particular article (to know what is popular) or if a video file was viewed or abandoned half way through. We also look at where content is accessed so we know how to arrange our sites for optimal user experience. We count clicks on “Like” and “Tweet” plug-ins and what content from our sites was shared or referenced.

Personalization

These cookies help make the content as personalized as possible, for example by showing you targeted banners and relevant recommendations.

We examine what type of reference was used to reach our sites, e.g. an email campaign or a link from a referral site, so we can estimate the effectiveness of our promotions and advertising campaigns.

Advertising

We use these cookies to dynamically serve ES EM GEE PTY LTD ads on both ES EM GEE PTY LTD and selected third party websites.

We may expand 3rd party advertising to other ES EM GEE PTY LTD sites in the future.

Our domains may also include elements that set cookies on behalf of a third party, e.g. a “Like”- button from Facebook or a “Tweet”- button from Twitter.

How can I manage cookies?

You can review the options available to manage cookies in your browser. The browser can be used to manage cookies relating to basic functions, site improvement, personalization and advertising. Different browsers use different ways to disable cookies, but they are usually found under a Tools or Options menu. You can also consult the browser’s help menu. In addition to cookie management, browsers usually let you control files similar to cookies, for example Local Shared Objects, e.g. by enabling the browser’s privacy mode.

Disabling cookies may prevent you from using certain parts of ES EM GEE PTY LTD websites. If you delete your cookies from the browser, you may need to remember to re-install opt-out cookies.

How long do we keep the information?

It depends based on the type of cookies. Session cookies expire when you close the browser. Persistent cookies, including Local Shared Objects (“Flash cookies”), have typical expiration dates ranging from two months up to a couple of years.

What else should you know?

ES EM GEE PTY LTD may from time to time change this Policy. However, if this Policy is changed in a material, adverse way, ES EM GEE PTY LTD will post a notice advising of such change at the beginning of this Policy and on this site’s home page. We recommend that you re-visit this Policy from time to time to learn of any such changes to this Policy.

If you have additional questions, please contact us by writing to:

ES EM GEE PTY LTD
105 Mawson Rd,
Meadows.
South Australia, 5165