

Litt Global Pty Ltd
(ACN 631 851 511)
(Litt Global)

Privacy Policy

1 General

- 1.1 Unless otherwise specified, capitalised terms used in this Privacy Policy (**Policy**) have the same meaning in the User Terms and Conditions.
- 1.2 **you** or **your** means any person who accesses and uses Litt Global's Services.
- 1.3 This Policy forms part of and is incorporated into the User Terms and Conditions and the Vendor Terms and Conditions.
- 1.4 This policy has been prepared in accordance with:
- (a) applicable Australian privacy and data protection laws, including the *Privacy Act 1988 (Cth)* (**Privacy Act**) and the Australian Privacy Principles contained therein; and
 - (b) the General Data Protection Regulation (EU) 2016/679 (**GDPR**),
- as applicable.
- 1.5 This Policy applies to Litt Global's collection and disclosure of your Personal Information (as defined in clause 2.2) when you use the Platform, or when you use the Services, when you register an Account or when you agree to register to use the Platform through your Facebook profile.
- 1.6 This Policy is intended to describe what information Litt Global collects and/or processes; how Litt Global uses it; and under what circumstances, if any, Litt Global discloses any Personal Information. Please read this Policy before using the Platform or submitting any Personal Information. By using the Platform, you are accepting the practices described in this Policy.
- 1.7 Litt Global may in its absolute discretion elect to amend this Policy by uploading a revised Policy on the Platform and the Website from time to time. Any changes made to this Policy will apply from the date Litt Global uploads the revised Policy onto the Platform and the Website. Litt Global strongly encourages you to refer to this Policy on an ongoing basis to understand your rights under the Policy. Unless otherwise stated, Litt Global's current Policy will apply to all information Litt Global has about you. If you do not agree with the practices outlined in this Policy, you must immediately stop using the Services and take steps to cancel your Account.

2 Types of Information Collected

- 2.1 When you use the Services, Litt Global may collect your Personal Information including, in some instances, Sensitive Information (as defined in clause 2.3) when you use the Services.
- 2.2 **Personal Information** includes information which identifies a natural person, or by which the person's identity may be reasonably determined. It may include a person's full name, mailing or residential address, date of birth, bank account details, credit card details, phone number and email address, and includes personal data for the purposes of the GDPR. For the purpose of this Policy, the term Personal Information also includes personal information obtained from a third party which, under and in accordance with the Privacy Act may lawfully be exchanged.
- 2.3 **Sensitive Information** includes information (or an opinion) about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical

beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices or criminal record, as well as information about an individual's health, genetic information or biometric information.

- 2.4 **Statistical Information** includes the internet protocol (IP) address of your device used to connect to the Services, time zone setting, language preferences, location data, information about your mobile phone and/or browser, operating system and device and other information which does not identify you personally, but which tracks your usage of the Services.
- 2.5 If you choose to register an Account on the Platform using your Facebook profile, the Personal Information which Litt Global will collect includes, but is not limited to all information contained within your Facebook profile.
- 2.6 Litt Global also collects information automatically (through the use of cookies) on its Websites and Platform as discussed further below.

3 Personal Information about third parties

- 3.1 If at any time you supply Litt Global with Personal Information about another person, you should ensure that you have written consent from that person to do so, and you must agree to inform that person about Litt Global and that Litt Global may use and disclose their Personal Information in accordance with and for the purposes outlined in this Policy.

4 How Litt Global Collects Personal Information

- 4.1 Litt Global will not ordinarily collect any Personal Information (or Sensitive Information) about you except where you provide it to Litt Global or it is provided to Litt Global with your authority.
- 4.2 Litt Global collects Personal Information when you:
- (a) take steps to register an Account, enquire about or sign up for and use the Platform;
 - (b) connect and interact with other Users;
 - (c) provide Litt Global with feedback or make a complaint; and
 - (d) talk to Litt Global, or do business with Litt Global or any Participating Vendor.
- 4.3 In the event Litt Global receives unsolicited information about you, it will only be collected where:
- (a) such collection is reasonably necessary for one or more of Litt Global's functions or activities; and
 - (b) Litt Global either:
 - (i) obtains your consent; or
 - (ii) is authorised or required to do so by Law.
- 4.4 Where clause 4.3 does not apply, Litt Global will destroy any unsolicited Personal Information that Litt Global receives.
- 4.5 In addition, Litt Global may come into contact with or process Personal Information in the course of engaging with Participating Vendors. Whilst this Policy governs how Litt Global will process Personal Information Litt Global may receive from Participating Vendors, Litt Global makes no representations or warranties regarding how the Personal Information is collected or used by Participating Vendors. Litt Global encourages you to familiarise yourself with the privacy policy of Participating Vendors' websites you visit for an understanding of your rights.

5 How Litt Global uses Personal Information

5.1 Litt Global will make every effort to advise you of the purposes for which Litt Global is required to collect your Personal Information before that Personal Information is to be collected.

5.2 *To provide, develop and improve the Services*

You authorise Litt Global to use your Personal Information to:

- (a) contact you in relation to your use of the Platform, including (without limitation) to notify you of any modifications to our User Terms and Conditions, Voucher Terms, Deals and Giveaways Terms, or this Policy;
- (b) notify you about Litt Deals and Giveaways;
- (c) facilitate any Litt Deals and Giveaways with any business partners or Participating Vendors;
- (d) make improvements to the Services. For example, Litt Global may track any troubleshooting issues and compatibility issues with various operating platforms and devices to ensure Users have proper and stable access to the Services, and to implement updates where necessary;
- (e) measure the performance of the Services and to understand how the Services are used. For example, Litt Global may analyse Users' interactions with Content so Litt Global can streamline the process of your Account registration, use of Litt Cash or redemption of Store Vouchers with Participating Vendors.

5.3 *To ensure compliance*

Additionally, the purposes for which Litt Global will generally collect and use your Personal Information will include:

- (a) complying with all Laws;
- (b) co-operation with authorities in relation to any investigation into any User of the Platform;
- (c) performing Litt Global's administrative operations, including accounting, risk management, payment processing, record keeping, archiving, and development and testing;
- (d) managing Litt Global's rights and obligations under the User Terms and Conditions, Vendor Terms and Conditions, Voucher Terms, Deals and Giveaway Terms or this Policy;

5.4 *Marketing Communications*

If you are a User, Litt Global may send you email marketing communications to:

- (a) provide you with information about Litt Global's products and Services;
- (b) invite you to participate in Litt Global's events and surveys; and/or
- (c) communicate with you for other marketing purposes.

In doing so, Litt Global will always provide you with the option to unsubscribe from Litt Global's marketing communications. If you do not want to receive marketing communications from Litt Global, please contact Litt Global at support@thelittapp.com

6 Disclosure of Personal Information

6.1 By continuing to use the Services, you consent to the disclosure of your Personal Information in accordance with this Policy.

6.2 Litt Global takes the protection of your Personal Information very seriously. Litt Global will only disclose your Personal Information to its employees, officers, insurers, professional advisers, agents or contractors insofar as such disclosure is necessary to enable Litt Global to perform its obligations and to

act in accordance with this Policy and such Personal Information will not be disclosed or used other than as specified in this Policy without your express consent, which will be stored in Litt Global's records.

- 6.3 Litt Global will not use or disclose your Personal Information for any purpose other than as disclosed in this Policy unless:
- (a) Litt Global has obtained your consent to its use or disclosure; or
 - (b) the purpose is related to the purposes disclosed in this Policy and an individual would reasonably expect Litt Global to use or disclose that Personal Information in that manner.
- 6.4 Litt Global may also disclose your Personal Information to other third parties from time to time. Subject to what is permitted by Law, the types of third parties to whom Litt Global may disclose your Personal Information may include:
- (a) Litt Global's agents, contractors and external advisors (such as legal and financial advisors) whom Litt Global engages from time to time to carry out, or advise on, Litt Global's functions and activities;
 - (b) business partners (e.g advertisers, geofencing developers etc.);
 - (c) Participating Vendors including (without limitation) to facilitate your participation in any Litt Deals and Giveaways; and
 - (d) regulatory bodies, government agencies, law enforcement agencies and courts.
- 6.5 Unless otherwise specified in this Policy or as required by Law, you authorise Litt Global to disclose your Personal Information and Statistical Information to third parties:
- (a) where Litt Global assigns, transfers, sells or otherwise licenses its rights under the User Terms and Conditions to a third party;
 - (b) where Litt Global reasonably believes (acting in good faith) that such disclosure is necessary in order to investigate, prevent or take action regarding illegal activities such as suspected fraud, situations involving potential threats to the physical safety of any person, violations of any of Litt Global's terms and conditions (including the User Terms and Conditions, Vendor Terms and Conditions, Voucher Terms and Deals and Giveaways Terms), or as otherwise required by Law;
 - (c) in a business transaction including (but not limited to) a merger with or acquisition by another company, or the sale of all or a substantial portion of Litt Global's assets, of which your Personal Information and Statistical Information may be among the assets transferred. Where this occurs, Litt Global will notify you using the Personal Information linked to your Account; and
 - (d) where such disclosure is required by Law, or when Litt Global reasonably believes in good faith that such disclosure is necessary to protect Litt Global's rights.
- 6.6 You consent to Litt Global disclosing Statistical Information to third parties including, without limitation, to analytics companies and Litt Global's business partners, to help Litt Global understand usage patterns, to assist in product development and for advertising purposes.
- 6.7 Litt Global may from time to time disclose your Personal Information to overseas entities who may not be bound by Australian Law. Where Litt Global discloses your Personal Information to overseas recipients, Litt Global will make every reasonable effort in the circumstances to ensure that the overseas recipients comply with this Policy and any applicable Australian Law with respect to the protection of Personal Information, unless:
- (a) Litt Global believes on reasonable grounds that the overseas recipient is bound by Laws that are substantially similar to the Privacy Act which can be enforced against the overseas recipient; or
 - (b) you give Litt Global an informed consent to the disclosure of your Personal Information to an

- overseas recipient who may not be bound by Australian Law; or
- (c) the disclosure to an overseas recipient is authorised or required by Australian Law; or
- (d) it is permitted by the Privacy Act.

7 How Litt Global Uses Cookies

- 7.1 If you register an Account or continue to use the Services, you agree to Litt Global's use of tracking technologies, referred to as cookies, to track and record your usage. Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information.
- 7.2 When you access or use the Services, Litt Global will automatically use cookies to collect technical information including:
 - (a) Statistical Information; and
 - (b) information about your interaction with the Services, including your clickstream to, through and from the Platform, activity on third party websites which are linked to the Platform, and views and interactions with Content.
- 7.3 You may control the technical information Litt Global collects, including through your browser or device settings. In doing so, you:
 - (a) acknowledge some of Litt Global's Services may not function properly if you choose to disable cookies; and
 - (b) release Litt Global and its Related Bodies Corporate from any and all Claims, liability and Losses which may arise out of, result from, or relate in any way to your decision to disable cookies (including any limitation on your ability to use the Services).

8 GDPR

- 8.1 Litt Global will comply with the principles of data protection (including as set out in the GDPR) for the purpose of fairness, transparency and lawful data collection and use.
- 8.2 Litt Global will process Personal Information as a processor and/or, to the extent relevant, as a controller (as those terms are defined in the GDPR).
- 8.3 Litt Global must have a legal basis to process Personal Information which it collects. Litt Global relies on several legal bases to process Personal Information in accordance with this Policy, including:
 - (a) where the person has consented to the processing of Personal Information by Litt Global (which consent may be withdrawn at any time);
 - (b) for Litt Global's legitimate interests to operate, provide or improve the Services;
 - (c) where necessary to provide access to, and use of, the Services; and
 - (d) where Litt Global is authorised or required by Law to do so.
- 8.4 Litt Global will only process any Personal Information that is considered Sensitive Information if the person expressly consents to it being provided to it being provided to Litt Global.
- 8.5 Where a person has (directly or indirectly) provided consent to Litt Global processing their Personal Information, the consent may be withdrawn at any time with future effect – i.e. the withdrawal of consent does not affect the lawfulness of processing based on the consent before its withdrawal. If

consent is withdrawn, Litt Global will only continue processing the person's Personal Information where Litt Global is permitted or obliged to do so by Law.

9 Your Rights Under this Policy

9.1 This clause 9 sets out the rights you have in relation to how your Personal Information is obtained and used.

9.2 Except as otherwise provided by Law, you have the following rights in connection with your Personal Information:

- (a) the right to be informed how your Personal Information is being used;
- (b) the right to access your Personal Information (and Litt Global will provide you with a free copy of it);
- (c) the right to correct your Personal Information if it is inaccurate or incomplete;
- (d) the right to delete your Personal Information (which is also known as "the right to be forgotten");
- (e) the right to restrict processing of your Personal Information;
- (f) the right to retain and reuse your Personal Information for your own purposes;
- (g) the right to object to your Personal Information being used; and
- (h) the right to object against automated decision making and profiling.

9.3 You are encouraged to contact Litt Global any time if you wish to exercise your rights in relation to this Policy. Litt Global reserves the right to request you verify your identity before Litt Global acts on any request made by you.

9.4 Alternately, please fill out a request form located [here](#).

10 Storage of Personal Information

10.1 Litt Global implements a variety of security measures to maintain the safety of your Personal Information. Your Personal Information is held on our company servers located in AWS Australia in a controlled, secure environment where it is protected from unauthorised access, use or disclosure.

10.2 Litt Global's servers may at times be located overseas in countries which are not bound by the Privacy Act, including, without limitation, the United States of America, and you hereby expressly consent to the disclosure of your Personal Information to overseas recipients. Where Litt Global takes such action, it will (subject to and in accordance with the Australian Privacy Principles) take reasonable steps to ensure the overseas recipient does not breach the Australian Privacy Principles in relation to the information and will otherwise comply with the GDPR in connection with that disclosure.

11 Security of Personal Information

11.1 Litt Global will use all reasonable efforts to keep secure your Personal Information, Statistical Information and all other information that you transmit to Litt Global online. Litt Global will take all reasonable care to protect and prevent unauthorised access to, or modification and disclosure of, your Personal Information.

11.2 Notwithstanding clause 11.1 above, you acknowledge the internet is inherently insecure and no data transmission online can be guaranteed as fully secure. Accordingly, Litt Global cannot guarantee or warrant the security of any information (including Personal Information) you provide through the use of

the Platform. You understand that any information you send online is at your own risk.

11.3 If Litt Global becomes aware of a breach of security in relation to your Personal Information, Litt Global will immediately use its best endeavours to take action to remedy the security breach, in order to limit the risk caused by unauthorised access to, or unauthorised disclosure of, your Personal Information before any serious harm is suffered as a result of the breach.

11.4 If Litt Global becomes aware of a breach of security, and a third party has, without authorisation:

- (a) accessed your Personal Information; or
- (b) disclosed your Personal Information to another third party (**Data Breach**);

and a reasonable person would conclude that such unauthorised access or disclosure is likely to result in serious harm to the individuals to whom the information relates, Litt Global will notify you and the Office of the Australian Information Commissioner (**OAIC**) with details of the Data Breach, including details of how Litt Global believes the Data Breach has occurred and to what Personal Information such Data Breach relates, and the steps that you can take in response to the Data Breach.

11.5 If Litt Global becomes aware of a Data Breach in which your Personal Information is lost, and Litt Global has reasonable grounds to believe that:

- (a) unauthorised access to, or unauthorised disclosure of, your Personal Information is likely to occur; and
- (b) if unauthorised access to, or unauthorised disclosure of, your Personal Information occurs, a reasonable person would conclude that such unauthorised access or disclosure is likely to result in serious harm to the individuals to whom the information relates,

Litt Global will notify you and the OAIC with the details of the Data Breach, including details of how Litt Global believes the Data Breach has occurred and to what Personal Information such Data Breach relates, and the steps that you can take in response to the Data Breach.

11.6 You understand that if you access the Services from outside Australia, other entities including, potentially, foreign governments, may collect, use and disclose your Personal Information in ways which differ from this Policy and the Laws of Australia.

12 How long your Personal Information is stored

12.1 You consent to Litt Global retaining your Personal Information for as long as necessary to fulfil the purposes for which Litt Global has collected it, including in order to satisfy any Law.

12.2 To determine the appropriate retention period for Personal Information, Litt Global will consider the amount, nature and sensitivity of the Personal Information collected from you, the potential risk of unauthorised use or disclosure of your Personal Information, the purposes for which Litt Global processes the Personal Information and whether Litt Global can achieve those purposes through other means. Litt Global will also at all times have regard to the applicable legal requirements under the GDPR and/or the Privacy Act (as applicable).

13 Third parties

13.1 Where Litt Global provides your Personal Information to third parties in accordance with this Policy, you acknowledge and agree that:

- (a) the use of your Personal Information by third parties is not in Litt Global's reasonable control;
- (b) third party websites may place their own cookies or other files on your computer or telephone, solicit Personal Information from you and may or may not use your Personal Information in accordance with their own privacy policies which may differ from this Policy; and

- (c) it is your responsibility to familiarise yourself with the privacy policy of any third party website you visit which collects Personal Information about you and to use your discretion when providing such information.

13.2 If Litt Global discloses personal information to a third party, Litt Global will always act to protect it in accordance with this Policy. However, you agree that Litt Global will not be liable for any Loss or liability which may be incurred as a result of, or in connection with, or in relation to any use of your Personal Information by a third party to whom Litt Global validly disclosed the Personal Information.

14 How to Contact Litt Global

14.1 If you believe that the privacy of your Personal Information has been compromised or has not been used in accordance with this Policy, you should contact Litt Global as soon as possible using the means provided on the Platform at:

Email: support@thelittapp.com

Phone: 1300 640 009

14.2 Your complaint will be taken seriously and addressed in accordance with clause 14 of the User Terms and Conditions in relation to Dispute Resolution.

15 How to Contact the Office of the Australian Information Commissioner

If you do not receive a satisfactory response from Litt Global, or you believe that Litt Global has not handled your complaint satisfactorily, you may wish to refer your complaint to the Office of the Australian Information Commissioner at:

Address: GPO Box 5218, Sydney NSW 2001

Email: enquiries@oaic.gov.au

Phone: 1300 363 992