

Privacy Policy

Last Modified 31 October 2018

1. Introduction

This Privacy Policy is Infomedia Ltd (including its subsidiaries IFM Americas Inc., IFM Europe Limited and Infomedia China) (“Infomedia”) official policy relating to the collection and use of information from you. This policy explains how and why Infomedia collects your personal information, how it is used, and what controls you have over our use of it. Infomedia is committed to complying with applicable laws governing the collection and use of personal information and to protecting and safeguarding your privacy when you deal with us.

2. Acceptance

By you sending an email, using any website of Infomedia, or by installing, accessing and/or using the products and services offered by Infomedia, you consent to the collection of information in accordance with this Privacy Policy and other agreements between us. You acknowledge and agree that your use of Infomedia’s websites or products constitutes your acceptance of this Privacy Policy and the [General Terms of Use](#).

3. Types of information collected

Infomedia may collect a range of information in the ordinary course of its business activities, including personal and non-personal information, including your name, phone number, email, IP address, all relating to your use of Infomedia’s products and / or services including websites.

4. Primary Purpose of collection

Infomedia collects information in the course of its business activities in order to:

- a) carry on its business and to provide you with products and / or services;
- b) provide marketing and obtain feedback about our products and services; and
- c) deliver access to and contents of websites with improved efficiency and functionality.

Without this information, Infomedia may be unable provide its products and/or services to you.

5. How Infomedia collects information

Infomedia collects information in two main ways:

- a) directly where you:
 - i. buy or obtain a subscription to our products and / or services;
 - ii. contact us to obtain support or make an inquiry in respect of our products or services;
 - iii. submit your email address and other information for inclusion in our database;
 - iv. browse any of Infomedia’s active websites or domains;

- v. become a supplier to or shareholder of Infomedia.
- b) indirectly, for instance, via the placement of browser cookies or other analytical tools on computers and devices used by you.

At or before the time we collect information, we will take reasonable steps to inform you about such collection, and draw your attention to this Privacy Policy, including Infomedia's [Cookie Policy](#).

6. **How your information will be used**

You acknowledge and agree that Infomedia may use or disclose information for the primary purpose for which it is collected, including but not limited to,

- a) provision of services and/ or products, administration related thereto, fulfilment of orders placed by you, marketing and notification about changes to our services and / or products, and general record-keeping related to your use of our products and/or services, register and handle support, communicate with you or to comply with our legal obligations; and
- b) may be shared between Infomedia Ltd and its related bodies corporate, and may be disclosed on a confidential basis to our third party contractors, agents or to our suppliers related to the primary purposes;

We may also use such information for a purpose related to the primary purpose of collection and where a reasonable ordinary person would expect that we would use the information in such a way.

Where you provide personal information to us about another person, you warrant that you are authorised to provide that information to us, and that you will inform that person who we are, how we use and disclose their information, and that they can gain access to that information.

7. **Changes and opt-out choices**

You can delete or amend data you have entered via our applications. You can change your choices about receiving either subscription or general communications at the data collection point, within your account preference settings. You may opt-out at any time using the links at the bottom of any promotional email or by sending an email request to privacy@infomedia.com.au and we will limit and / or delete use and disclosure of your personal data as requested. Please note, this option does not apply to communications primarily for the purpose of administering business relationships, including contracts, support, or other administrative and transactional notices where the primary purpose of these communications is not promotional in nature.

8. Disclosure of information

Your information will only be disclosed to parties outside of Infomedia as set out in this Privacy Policy or as otherwise notified to you at the time of collection of the information. Infomedia may be required to disclose your information where:

- a) we reasonably suspect that there is a threat to your health or safety or the public's health or safety;
- b) we reasonably suspect that illegal or unlawful activity has been, is being or may be engaged in, and the use or disclosure is a necessary part of our investigation or in reporting the matter to the relevant authorities; and / or
- c) where such use or disclosure is required under or authorised by law (for example, to comply with a subpoena, a warrant or other order of a court or legal process).

9. Third party sources

Infomedia's website or other materials may contain links to websites owned and operated by third parties, who may collect personal information about you. Once you navigate away from Infomedia's webpage(s), this Privacy Policy no longer applies, and Infomedia disclaims any responsibility for the privacy practices of such third parties, or the content they provide. You should always review the privacy policies of all third party with whom you interact.

10. Cross Border Transfer, Security and Storage

By accessing an Infomedia website, or by installing, accessing or using Infomedia's products and/or services, except where we have agreed under an agreement to retain such information within a specific country or region (such as to comply with the European General Data Protection Regulation and others), you agree and consent to the cross-border transfer of information and/or data. Infomedia uses third parties, including Amazon Web Services, Netsuite, Zendesk and Microsoft cloud services, to host its emails, databases and systems on and Google to provide analytic services and has entered into suitable agreements to protect your data. Those providers are generally located in Australia, the European Union and/or the European Economic Area and/or the United States of America. Infomedia uses commercially reasonable physical, managerial, and technical safeguards to preserve the integrity and security of personally identifiable information, including having secure data networks protected by industry standard firewall and password protection systems. Data transmission over the Internet may not be secure and you transmit all information at your own risk. Upon receipt of your transmission, Infomedia make every effort to ensure its security on our systems. You are solely responsible for keeping your passwords and/or account information secret, ensure your computer systems are up to date and implement antivirus and other protective measures.

11. **Contacts, Access to and Correction of Personal Information**

Infomedia is committed to maintaining accurate, relevant and appropriate information about our customers, client and other stakeholders. You may contact us and/ or request access to your information through our Privacy Officer as follows:

- **Privacy Officer, Infomedia Ltd**
- 3 Minna Close, Belrose, NSW, 2085
- Locked Bag 5009, Frenchs Forest, NSW 2086, Australia
- Telephone: +61 (0) 2 9454 1500 Fax: +61 (0) 2 9454 1799
- Email: privacy@infomedia.com.au

Infomedia will review your request in accordance with applicable privacy laws and will provide you with access to a copy of the information it holds about you, and will permit you to update or change that information, unless:

- a) you cannot satisfy Infomedia that you are entitled to access the information; or
- b) Infomedia is entitled to refuse or withhold such access.

If you are refused access, we will provide reasons for such refusal upon your request. For security reasons, Infomedia will not disclose sensitive security details including such things as usernames, passwords or credit card information.

12. **Complaints**

If you have a complaint about our Privacy Policy or the collection, use or disposal of your personal information, your complaint should be directed to the Privacy Officer (see contact details above). The Privacy Officer will review your complaint and attempt to resolve it. If you are not satisfied with the outcome of this review, then you may request that an independent person investigate your complaint.

13. **EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework**

Overview: Infomedia complies with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States.

Certification: Infomedia has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, visit <https://www.privacyshield.gov/>

Complaints: In compliance with the Privacy Shield Principles, Infomedia commits to resolve complaints about our collection or use of your personal information. EU and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Infomedia at the contact details above.

Enforcement: Infomedia is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC) and has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved Privacy Shield complaints concerning data transferred from the EU and Switzerland, and which may include binding arbitration.

Liability: Infomedia has responsibility for the processing of personal information it receives under the Privacy Shield and subsequently transfers to a third party acting as an agent on its behalf. Infomedia shall remain liable under the Principles if its agent processes such personal information in a manner inconsistent with the Principles, unless the respective Privacy Shield organization finds that Infomedia is not responsible for the event giving rise to the damage.

14. **Changes to Privacy Policy**

This Privacy Policy may be revised periodically without further notice to you and this will be reflected by the "last modified" notice above. Please revisit this page to stay aware of any changes. Your continued use of the Infomedia's products and services, including this website constitutes your agreement to this Privacy Policy and any future revisions.