



Spriggy Privacy Policy

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All references to "Spriggy", "we", "us" or "our" in this privacy policy are references to Rivva Pty. Ltd. ABN 86 603 542 918 trading as Spriggy and the Spriggy group entities (Spriggy Schools Pty Ltd ABN 48 650 445 819, Spriggy Invest Pty Ltd ABN 21 639 671 926 and Rivva Mobile Pty Ltd ABN 35 674 423 333).

Spriggy is committed to protecting your privacy and to compliance with the Privacy Act 1988 (Cth). If you have any questions relating to this privacy policy or your privacy rights, please contact us.

This privacy policy sets out the policy of Spriggy for handling and protecting your personal information when you visit our websites, download and use our apps, apply for and use Spriggy products, or otherwise interact and engage with us in relation to our products, features, and services. It applies to the personal information of both parents and/or guardians and their children who may use our products and services. If you do not provide the information requested, we may be unable to provide you with our products and/or services.

Personal Information

Personal information is information or an opinion about an individual who is identifiable or reasonably identifiable, from the information or opinion.

Spriggy may collect personal information about you, which may include:

- your contact details, including your name, postal address, email address and phone numbers;
- payment details;
- information collected using cookies, such as when you visit our website(s) and interact with our content (please see section on cookies below for more information), and technical information about your device;
- information about your activity on our website and mobile applications;
- any identity information (such as your date of birth, driver's licence details, passport details, residential address or Medicare number) necessary for the purposes of complying with applicable laws such as the Anti-Money Laundering and Counter-Terrorism Financing Act 2006.

Collection of personal information

Spriggy may collect personal information as follows:

- directly from individuals (generally sought or collected through our sign-up forms, and if you use a Spriggy card to make a purchase in store or on-line or make a non-cash payment (if applicable) or otherwise use our applications);
- through our website, apps, social media and other digital services;
- third parties, such as from another Spriggy group entity, our service providers or partners;
- public sources; and
- any party authorised to act on your behalf.

We may monitor and record your communications with us (including email and telephone for security, dispute resolution and training purposes).

We may receive information about you when you link a third-party service with our services. For example, you may authorise our services (including via our apps) to access, collect, display and store files including images from your device. We only use images where they are uploaded by you to our app or website for the purpose of using an image as a profile photo or goal photo (as applicable). You or your child (where you have activated SPRK mode in the Spriggy pocket

money app) may authorise our services (including via our apps) to sync a contact list, address book or individual contact. This information is only used so that your connections are available to you through our services or so you can invite others to collaborate with you on our services. Where persons in your contact list are existing SPRK users, we may also store a unique identifier number for them for analytical purposes and to better understand interactions between existing SPRK users. We will not publish or disclose your contacts without your prior authorisation.

We may use Stripe Payment Australia Pty Ltd (ACN 160 180 343) ("Stripe") for payment, analytics, and other business services. Stripe may collect personal information including via cookies and similar technologies. The personal information Stripe collects may include transactional data and identifying information about devices that connect to its services. Stripe uses this information to operate and improve the services it provides to us, including for fraud detection, loss prevention, authentication, and analytics related to the performance of its services. To provide these services to Spriggy, Stripe shares personal information (including your payment method information e.g. the last 4 digits of your card number and expiration date) with Spriggy. Stripe may update your payment method information (and share this updated information with Spriggy) if your information has changed or been updated to ensure your transactions go through smoothly, including by working with your card issuer. You can learn more about Stripe and its processing activities via its privacy policy at <https://stripe.com/privacy>.

Our websites, apps, cookies and event tracking

We provide information and services through a range of digital and online services including websites (e.g. spriggy.com.au), apps, email, online advertisements, IPTV and social media profiles. These services may be operated by us to provide a consistent experience, personalise your use of each of those services and provide targeted marketing. Our website(s) and app(s) may also use a variety of analytics and tracking tools designed to help us understand usage, fix bugs and improve the effectiveness of our marketing activities. This includes "cookies", tracking pixels and app or website based event data. These tools help us with marketing analytics, provide information on how users interact with our website and determine the most relevant audience for our ads. To amend your ad preferences for a specific social media network, please review the relevant privacy policy for that provider. A cookie is a piece of information that allows the server to identify and interact more effectively with your device. The cookie assists us in maintaining the continuity of your browsing session and remembering your details and preferences when you return. Other technologies that may be used with Spriggy include web beacons (which may operate in conjunction with cookies), Flash local stored objects and JavaScript. You can configure your web browser to reject and delete cookies and block JavaScript but you may find some parts of Spriggy services then have limited functionality. You can control your preferences regarding Flash local stored objects via this site.

Our systems record a variety of information in relation to interactions with our online services. This can include information about software versions used, device identifiers (like IP address), location data (where available and not disabled by the user), dates, times, file metadata, referring website, data entered and user activity such as links clicked. In some cases, third parties may use cookies and other technologies such as those described above as part of the Spriggy services. These technologies may be used in connection with activities like surveys, online behavioural advertising, website analytics and email campaign management.

Use and disclosure of personal information

We may use your personal information to:

- provide you with our services (this includes providing you with access to our mobile application(s) and, where applicable, enabling our service providers or partners to provide their products/services to you);
- provide our card/ payment services (this includes processing payments, delivering orders, managing promotions, providing refunds and discounts, and verifying your identity);

- conduct product/market research and user analytical activities;
- communicate with you and respond to any specific requests you may make of us;
- notify you of any products, services or special offers that may be of interest to you;
- audit and monitor the services we provide to you;
- tailor, personalise and improve our products and services;
- provide you with information and marketing about our products;
- conduct risk assessments;
- update your personal files and manage our relationship with you;
- enable us to meet our legal obligations under law (eg AML/CTF, tax laws); and
- protect our legal rights and resolve disputes or complaints.

Spriggy may disclose your personal information within the Spriggy group and to our agents, contractors, partners or third party service providers to enable them to provide administrative and other support services to us and, where applicable, to provide their products/services to you. We may also use third party service providers to maintain some of our data systems and provide auxiliary services. We require any party that has access to personal information to maintain comparable privacy policies and procedures and be subject to comparable privacy regulation in their jurisdiction, if located outside Australia.

When you use our services, we may share certain information about you with other service users. For example, we may display images you authorise us to access from your device with connections you invite to collaborate with you on our services.

We will also disclose your personal information where the disclosure is required by law, for example to government agencies and regulatory bodies as part of our statutory obligations, or for law enforcement purposes.

Spriggy is not responsible for the privacy practices of third parties. Where we provide links to third party websites or services you should review any privacy policies of those third parties for further information on their privacy practices.

Direct Marketing

We may utilise your personal information to provide you with targeted marketing and advertising initiatives via telephone, email or other media such as social media, regarding products, services or special offers we think may be of interest to you. You may notify us that you do not wish to receive such communications by clicking on the opt-out link provided or otherwise opting out by contacting us at any time, for example by emailing us at hello@spriggy.com.au.

Often the law requires us to advise you of certain changes to products/services or regulations. You will continue to receive this information from us even if you choose not to receive direct marketing information from us. We will only disclose your information to an outside party for the purpose of allowing them to directly market to you, where you have consented to such disclosure.

Cross border disclosure

Spriggy transfers personal information overseas for the purpose of operating the services we provide to you including providing you with customer support and communications to jurisdictions with a comparable privacy regime in place. At the current time these overseas jurisdictions are primarily the United States, Europe and the United Kingdom.

Access to and correction of personal information

You may request access to or correction of the personal information which Spriggy holds about you by contacting our Privacy/Data Protection Officer on the details set out below. We will not charge you a fee for your access request but may charge you the reasonable cost of processing your request.

Privacy/Data Protection Officer
hello@spriggy.com.au

We will seek to provide such information within a reasonable period of time, and in the manner so requested (where reasonable to do so). If you change your contact details (such as your phone number, street address or email address) or if any of your details need to be corrected or updated please let us know as soon as possible.

Spriggy may not always be able to give you access to all the personal information we hold about you. If this is the case, we will provide a written explanation of the reasons for our refusal, together with details of our complaints process for if you wish to challenge the decision.

Security of personal information

We take reasonable steps and precautions to keep personal information secure from loss, misuse, and interference, and from unauthorised access, modification or disclosure.

If you use the Internet to communicate with us, you should be aware that there are inherent risks in transmitting information over the Internet. While Spriggy utilises SSL security protocols we do not have control over information while in transit over the Internet and we cannot guarantee its security.

Where information is no longer required to be held or retained by Spriggy for any purpose or legal obligation, we will take all reasonable steps to destroy or de-identify the information accordingly. If at any time you wish to have your personal information that we hold destroyed or de-identified please contact us at hello@spriggy.com.au and we will take reasonable steps to attend to this request, unless there is a requirement for the information to be held or retained by Spriggy to comply with our legal obligations or as may be permitted by law.

The Spriggy website(s) and app(s) may contain links to the websites of third parties. If you access those third party websites, they may collect information about you. You will need to contact them or review their privacy policies to ascertain their privacy standards.

Your Consent and Changes to the Privacy Policy

Upon using our website(s), any Spriggy mobile application and our services, you consent to our use and handling of your information as set out in this policy. If at any time our information practices change in the future, we will amend our policy and will provide the updated version on our website. You should check our website periodically to ensure you are up to date with our current policy. We may provide you with notice where we make material changes to our policy.

Privacy Complaints

If you have a complaint relating to our compliance with privacy laws or our treatment of your personal information, please contact our Privacy/Data Protection Officer via email to hello@spriggy.com.au.

We will investigate your complaint and endeavour to resolve the issue to your satisfaction. If you are not satisfied with the outcome of your complaint, you have the right to lodge a complaint with the Office of the Australian Information Commissioner by telephoning 1300 363 992 or visiting their website at www.oaic.gov.au.