# **Privacy Policy**

LECOOV AUSTRALIA PTY LTD (ACN 623 311 937) ("LECOOV", "we" or "us") is committed to respecting and protecting the privacy rights and personal information of all our partners, users, employees and suppliers. This privacy policy is intended to provide you with information on how we collect, use, disclose and store the information that you provide to us so that you can make appropriate choices for sharing information with us. In addition to our Privacy Policy, whilst we are not bound by the Privacy Act 1988 (Commonwealth) as a small business, we are also using our best endeavours to manage personal information in accordance with the Australian Privacy Principles set out in the Privacy Act 1988 (Commonwealth).

For the purposes of this policy, "personal information" means information whether or not an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about a person whose identity is apparent, or can be reasonably ascertained, from the information or opinion.

### **Collection of Personal Information**

We will only collect personal information which is necessary for or in connection with the conduct of our business. We may collect personal information directly from you, or in the course of providing our services to you as a partner, user or in dealing with you as a service provider or employee.

If you do not give us the information we seek, we may be limited in our ability to provide services to you, or engage you to provide services to us.

### For Users

When you scan a LECOOV QR code to obtain information in your native language, we do not collect or record any personal identity information from you, such as your name, IP address or contact details. However, we may collect necessary information to enable us to provide you with tailored information, including but not limited to your language preference and the place or entity you are visiting.

When you use information provided by us to communicate with or obtain goods or services from our partners, our partners may collect your personal information from you. For example, when you make a booking, our partner may collect your contact details, preference, payment details and other types of personal information. You should make enquiries with our partners directly in respect to any personal information collected by them.

### For Partners

We may collect personal information when you enquire about our services or when you become a partner of LECOOV, and in the course of providing services to you as a partner. If you are a company, we may collect personal information of your directors, officers and employees.

The kinds of personal information we collect include but not limited to:

- general personal information, including your name, gender, email, address, identification documents and contact details;
- other personal information such as your opinion, preference and your opinions in respect to our services, your payment details and other information; and
- any information we are required to collect by law.

### Prospective Employees or Applicants

We collect personal information when recruiting personnel, such as your name, contact details, qualifications and work history. Generally, we will collect this information directly from you. We may also collect personal information from third parties in ways which you would expect (for example, from recruitment agencies or referees you have nominated). Before offering you a position, we may collect additional details such as your tax file number and superannuation information and other information necessary to conduct background checks to determine your suitability for certain positions.

#### Other Individuals

We may collect personal information about other individuals who are not partners, employees or users of LECOOV. This includes but is not limited to the members of the public who participate in events, individual service providers and contractors, and other individuals who interact with LECOOV on a commercial basis. The kinds of personal information we collect will depend on the capacity in which you are dealing with us. Generally, it would include your name, contact details, and information regarding our interactions and transactions with you.

### **Sensitive Information**

Sensitive information is a sub-category of personal information which is given a higher level of protection under the Privacy Act, which includes information or opinion of a person'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 preferences or practices; criminal record; and health information. We will only collect and disclose sensitive information with your consent.

### **How We Use Your Information**

Personal information, which we collect, will be used for or in connection with the conduct of our business. For example, your personal information may be used for the following purposes:

For Users: delivering tailored information of our partners in your native language.

## For Partners:

- providing you with services or information relating to services;
- maintaining our business relationship;
- processing payments, providing refunds or discounts;
- reviewing your financial position and reviewing your credit worthiness; and
- conducting marketing researches and developing our products and services.

### For Other Individuals:

- responding to requests for information and other general inquiries;

- recruitment processes (including for volunteers, internships and work experience);
- obtaining goods and services from our suppliers; and
- conducting marketing researches and developing our products and services.

If you don't want to receive direct marketing, you can tell us by using any of the methods set out in this policy.

### **Disclosure to Third Party**

We may disclose your information to certain third parties, including, but is not limited to:

- our third party service providers in connection with our business, including but not limited to advisors and consultants; professional advisors, banks, insurers and IT services providers (such as our cloud server):
- credit reporting bodies and credit providers; and
- government and law enforcement agencies or regulators.

We do not use or disclose personal information for purposes other than the identified purposes for which it is collected, except with the consent of the individual or as required or permitted by law.

### **Transfer out of Australia**

LECOOV is a global organisation and works with clients, service providers, sponsors and commercial interests across the globe. We may from time to time transfer personal information collected by us outside Australia, including but not limited to:

- disclosure to our staffs or affiliated entities who are overseas;
- transfer and store on a "cloud" server which is physically situated outside Australia and managed by third party supplier.

We will take reasonable steps to ensure that the overseas recipients will handle your personal information in a manner which is consistent with this privacy policy, but it is not always practicable to do so.

### **Security**

We respect privacy of individuals, and regard breaches of your privacy very seriously. We seek to maintain reasonable security measures in order to attempt to protect against the loss, misuse or alteration of personal information under our control. We hold personal information in our computer facilities in Australia and overseas, cloud based server and paper-based files and other records on site.

Unfortunately, there is no such thing as perfect security. As a result, although we strive to protect your personal information, we cannot ensure or warrant the security of any information you transmit to us through or in connection with our website or that we store on our systems or that is stored on our service providers' systems. Furthermore, to the extent permitted by law, we accept no responsibility and/or liability for any security breach.

### **Access and Correction**

We take reasonable steps to ensure that the personal information held by us is accurate, up to date and not misleading. You have the right to access or correct your personal information, with limited exceptions. We may decline your request to access or correct your personal information in certain circumstances in accordance with the Australian Privacy Principles. As permitted by law, we may charge you a reasonable fee for a copy of your records.

### **Contact Us**

For further information on our privacy policy, or for questions on information that we may have collected from you, or should you wish to have your name removed from our mailing list, or if you wish to access or correct any of your personal information that we may be in possession of, please contact us by either of the following methods and we will be happy to review, update or change your record status as appropriate:

By Phone at: 1800 953 688

By Mail at: Suite 502, 17 Castlereagh Street, Sydney NSW 2000 Australia

By Email at: info@militech.top

### **Complaints**

If you have any questions or concerns about your personal information which we collect, hold, use or disclose, or if you believe your privacy rights have been violated, you may file a complaint with us by notifying us via the above contact details of your complaint. We will investigate your complaint and determine whether a breach has occurred and what action to take. If you remain dissatisfied, you can also refer your matter to the Office of the Australian Information Commissioner via www.oaic.gov.au or phone 1300 343 992.

We reserve the right to make changes to this policy at any time. If we make a material change to this privacy policy, we will notify you by posting the change on our website and, if necessary, give you additional choices regarding such changes. Please check back from time to time to ensure that you are aware of these changes. Your continued use of our site will signify your acceptance of these changes.