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# Win24 Privacy Policy

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This document outlines the data protection and privacy policy of Win24  
Australia



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## 1 Our Privacy Commitment to You

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When you trust Win24 with your personal information, we know you expect us to protect it and keep it safe.

We won't let you down.

This means that when we receive your personal information we:

- tell you how we may use it
- keep it in a secure way
- make sure it is kept accurate and up to date
- restrict how we use it
- restrict who we provide it to.

This document briefly explains the main ways we protect your privacy and how we comply with the National Privacy Principles (NPP). It also describes the types of personal information we may collect from you. You can get more detailed information on these matters by contacting us.

When this document refers to we or us we mean John David Cooper and Associates trading as Win24 Australia (Win24 Australia).

### 1.1 How to contact us

You can contact us about this policy or our Win24 Australia services by:

- Writing to us at:  
3 Spring St Sydney NSW Australia 2000
- Calling our service number 1800 835 119
- Faxing us on 1800 835 119
- E-mailing [services@win24.com.au](mailto:services@win24.com.au).

If practical, you can contact us without identifying yourself. However, if you don't identify yourself, we may not be able to give you the information and services you would otherwise receive.

### 1.2 Why do we ask for personal information?

- We ask for your personal details when you register to become a subscribing member of Win24 Australia.
- We will only ask for personal information relevant to our business relationship with you. We require sufficient personal data to:
  - Enter you into Sponsor competitions
  - Ensure you are eligible to enter into the competitions
  - To contact you should we have notification of your success in winning a prize.
- We may also use the information to:
- Help manage the Win24 Australia service, for instance:
  - When you make a query about it



- When we want to contact you about changes to it.
- We may use personal information for other reasons, including:
  - Telling you about products or services that we think may interest you (unless you tell us not to – which you can do at any time).

### 1.3 What sorts of personal information do we ask for?

- So, when you apply to become a member of Win24 Australia we may ask for:
  - information that identifies you, like:
    - Your name, address, and other contact details
    - Your date of birth.
    - Your email address.
- When we conduct market research, we may also ask you for your opinion about competitions, services or staff. We treat these opinions as personal information.
- The Privacy Act places restrictions on collecting sensitive personal information about you (this includes information about your religious views, ethnicity, political opinions, criminal records, personal health information or sexual preferences). Generally, we won't collect this sort of information.
- As part of the requirements of registration, you will need to record your chosen monthly subscription payment details, either a Visa or MasterCard credit card or direct debit from a savings or cheque bank account. This information is collected using Westpac's secure PayWay gateway payment system and stored on Westpac's banking systems. No personal financial information of its members is recorded on Win24 Australia's systems and the employees or agents of Win24 Australia do not have visibility of the full details of the credit card or bank account numbers provided by Win24's subscribed members.

### 1.4 Can you access and correct your personal information?

- Win24 members have the right to access and correct their personal information that we hold. You can request to find out your personal information or request your personal information to be forwarded to you by contacting us (see How to contact us).
- We also require you to keep us informed of any changes to your personal data such as name and contact details, or required changes to your nominated credit card or bank account details (see How to contact us).



## 1.5 How do we collect personal information?

- As it's reasonable and practical to do so, we collect personal information directly from you via our Win24 Australia website at [www.win24.com.au](http://www.win24.com.au). We may also collect personal information from you through application forms, over the telephone, or in writing.
- We may also need to collect personal information from other people. Sometimes this may happen without your direct involvement. Some examples of the people or organisations from which we may collect personal information about you are:
  - Publicly available sources of information (such as telephone directories)
  - Market research organisations (such as shoppers' surveys and telephone polls)
  - Your representative (such as a legal adviser)
- So that we can better tailor our information and services to your needs, we use technology known as "cookies" to collect statistical information on website activity, such as the number of people using our website and how they navigate through it. You can find more information about this technology by visiting the Google Analytics website ([www.google.com](http://www.google.com)).
- So that we can better tailor information and products to your needs, when we send you email messages, we may use technology to identify you so that we can know when you have opened the email or clicked on a particular link in the email.
- When you ring us, we may also monitor and/or record telephone calls for the purposes of staff training and to verify statements made during the phone call. Any voicemails recorded on our 1800 number will also be kept for follow-up and action by our services personnel and providing you with any requested feedback or service.

## 1.6 Do we provide your personal information to others?

- We may share your personal information with other companies within the global Win24 operation. In order that you, as a member, may be entered into Australian competitions each month, we forward your information in a secure manner to a central service operated by the Win24 franchiser. They, in turn, provide your required contact details to a competition sponsor upon your entry into their competition. The sponsor's record of your personal details is limited to your name, address, telephone contact details, and date of birth. Only personal details that are mandatory for entering a competition are provided. Your personal email address is never provided to competition sponsors. The separate Terms & Conditions applied to each prize draw and competition will usually contain a clause that states by entering the competition you consent to receiving marketing correspondence from the prize draw or competition sponsor.
- Sometimes we provide personal information about our customers to organisations outside of the Win24 business. Generally, these are organisations that help us with our business. These may include:



- Outsourced service providers such as mailing houses and telemarketing agencies
  - Authorised representatives of the Win24 Australia business.
- We strive to limit the information we give these organisations to what they need to perform their services for us or provide services to you. We also enter into contracts with organisations locally and overseas who provide services to us or who provide services jointly with us. These contracts require the organisation to:
  - Meet the privacy standards we set for ourselves in protecting your personal information and comply with the Privacy Act
  - Use the personal information only for the specific service
  - We ask them to perform the service that we ask them to provide, and for no other purpose.
- We may also need to provide your personal information to others outside of Win24 Australia where:
  - We are (in limited circumstances) allowed or required to by law or where we have a public duty to do so. For example:
    - If Win24 Australia reasonably believes that the use or disclosure of the information is necessary to prevent a serious or imminent threat to an individual or the public (see 2.1(e) of the NPP); and
    - If Win24 Australia reasonably believes that the use or disclosure of the information is reasonably necessary to enable an enforcement body (such as the police) to take certain action in respect of preventing criminal activity (see 2.1(h) of the NPP).
  - Usually we ask you to consent in writing (such as in our privacy consents). In special circumstances, you can consent by speaking to us.
- We may sometimes have to transfer your personal information overseas e.g. to the Win24 franchiser. We will only do this in accordance with the Australian National Privacy Principles.

## 1.7 Do we use personal information to market products and services to you?

- We may use your personal information to offer you products and services we believe may interest you, but we will not do so if you tell us not to.
- We won't sell your personal information to organisations outside the Win24 Australia operation.
- Win24 Australia will only offer you products or services, where we reasonably believe that they could be of interest or benefit to you.
- If you don't want to receive marketing offers from Win24 Australia, please tell us. You can tell us if we contact you by phone or at any time by calling 1800 835 119, by faxing us on 1800 835 119, or by writing to us at 3 Spring St, Sydney Australia 2001.



- We will act promptly on your request. We will also ensure each electronic message we send (e.g. by e-mail, SMS, MMS or iM) includes a method that enables you to tell us you do not want to receive future electronic marketing material.

## 1.8 Is your personal information secure?

Yes.

- We will use up-to-date techniques and processes, which meet current industry standards, to protect your personal information from misuse, loss and unauthorised access, modification or disclosure.
- The only people who are allowed to handle or have access to your personal information are those employees of Win24 Australia and those who perform services for us who need your personal information to do their jobs. All employees of Win24 Australia are bound by confidentiality clauses in their employment agreements to not misuse your personal information. Those who perform services on our behalf are also bound by privacy and confidentiality agreements.
- Paper documents are protected from unauthorised access or use through the various security systems that we have over our physical premises. We also maintain up-to-date computer and network security systems with appropriate firewalls, encryption technology and passwords to protect electronic copies of personal information.
- We also require you to help us by complying with the security measures designed to protect your personal identification numbers and passwords. These are set out in the terms and conditions of your membership. You may be able to limit your liability for unauthorised use of your login account and membership details if you observe these requirements.
- If we no longer require your personal information, we will take reasonable steps to destroy it in a secure manner or remove identifying features from it. This is subject to any legal obligations we have to keep information for a certain period of time.
- When you discuss your membership with us and we ask for personal information from you, we will make every effort to minimise the opportunities for other people to overhear the conversation.

## 1.9 Is Win24's Internet Website secure?

- The security of Win24 Australia's website will depend on both your actions and ours. When you use our website, we require you to take specific measures to protect against unauthorised access. These measures form part of the terms and conditions for Win24 membership and using our website. They include, but are not limited to:
  - Ensuring password(s) created by you are secure;
  - Destroying any documentation we issue containing your password(s);
  - Trying to memorise your password(s);
  - Not telling anyone of your password(s);





- Not keeping your computer and undisguised password(s) together;
- Immediately telling us by telephoning 1800 835 119 if you suspect the security of your password(s) have been breached.
- We use up-to-date and secure technology methods to protect your personal information when you use Win24 Australia's website.
- When Westpac Banking Corporation (PayWay facility) captures your personal financial information, it passes through a secure server using encryption technology that scrambles the personal information. This protects against unauthorised access to your information over the internet.
- Stored personal information about you is further protected from unauthorised access through the use of multiple firewalls, secure passwords and sign-in processes.
- For more information about how your privacy is protected when you use the Westpac PayWay website, visit their website ([www.westpac.com.au](http://www.westpac.com.au)) and locate their Internet Privacy Policy.
- We can't guarantee the policies and procedures of any other websites that may be linked from our website. They may or may not meet the same privacy standards we set for ourselves. So, you should take care to understand and evaluate their particular privacy standards and procedures, as needed.

### 1.10 What if we don't keep our promises?

- Although we are committed to keeping the promises set out in this document, we sometimes make mistakes. Fixing these mistakes and ensuring we deliver on our promises is very important to us.
- We've put in place a way of dealing with issues you might raise quickly and fairly. Please talk to us first - We aim to resolve your complaints at your first point of contact with us. This is our 'Ask Once' promise. So please raise your complaints with anyone handling your Win24 membership.
- You can contact us during business hours 9:00am to 5:00pm AEST from anywhere in Australia, by:
  - Telephone: 1800 835 119
  - Email: Go to our website, [www.win24.com.au](http://www.win24.com.au) and click on 'Contact Us' or simply email to [services@win24.com.au](mailto:services@win24.com.au)
  - Mail: Win24 Australia, 3 Spring St, Sydney NSW 2001.

### 1.11 If you are still unhappy, there are other bodies you can go to.

- The Office of the Federal Privacy Commissioner can consider most privacy complaints. Generally, before you can make a complaint, you must first complain in writing to the agency or organisation (i.e. Win24 Australia) you believe has interfered with



your privacy. You must also give the agency or organisation a reasonable time (usually 30 days) to respond to your complaint.

- For more information, consult their website at: <http://www.privacy.gov.au>
- The Office of the Federal Privacy Commissioner can be contacted on the privacy hotline: 1300 363 992.

## 1.12 Things you should know

- This policy is current as at 20 May 2011. From time to time, we may make changes to our policy or policies, processes and systems in relation to how we handle your personal information. We will update this policy to reflect any changes.