

Privacy Policy

Shore Trade Pty Ltd

Australia

Last updated: April 2019

About this privacy policy

Welcome to ShoreTrade (the **Platform**). The Platform is provided and controlled by Shore Trade Pty Ltd ("**Shore Trade**", "**we**" or "**us**"). We are committed to respecting your privacy as a user of the Platform ("**user**", "**you**" or "**your**"), and take the protection of your personal information seriously.

We have prepared this privacy policy to inform you of the personal information we collect and hold about you, as well as other data that we collect and hold, and how we use that information. This privacy policy also provides information about your privacy rights as an individual and how to contact us if you have any privacy concerns.

This privacy policy may change from time to time and it is therefore important that you review it regularly.

If you do not agree with any part of this policy, you should not use the Platform or any of our products or services.

What personal information do we collect and handle?

Personal information is any information or opinion (whether true or not, and whether recorded in a material form or not) about you as an identified individual, or an individual who is reasonably identifiable.

The types of personal information we collect and handle may include, but are not limited to:

- Your account information, such as your name, phone number, email address, address, bank details, login identifier and password;
- payment information, such as bank account details, or other third-party payment information (where required for the purpose of payment);
- your opt-in choices and communication preferences; and
- information about your location, including location information based on your SIM card and/or IP address.

What other information do we collect and handle?

The other types of information we collect and handle may include, but are not limited to:

- ABN, company delivery address and phone number; and
- information relating to your activities and use of the Platform, including your location when you participate in a transaction, quantities or types of seafood purchased and price paid.

How do we collect your personal information?

We collect personal information through various avenues, including:

- information you provide to us directly, for example:
 - when you create an account and use the Platform; and
 - when you communicate or interact with us by phone, email and online (including through our website and Platform application);
- information provided by other users in the context of a purchasing transaction; and
- information from third parties, including:
 - our suppliers (such as for the purposes of providing freight or delivery services);
 - from third-party services (such as third party payment or credit providers, third party marketing or advertising providers or third party analytics or reporting providers);
 - business directories and other commercially or publicly available sources; and
 - other third parties who provide services to us.

You must only provide us with the personal information of someone else if you have that person's consent to do so.

Information we obtain from other sources

Cookies

Our website may use 'cookies' from time to time. Cookies could be used to collect personal information. A cookie is a small file that is stored on your device by a website. Cookies contain information which is readable by the website that issued the cookie to you and is commonly used to remember your details and preferences when you return to that website. Your web browser can be configured to reject cookies. If you set up your web browser to reject cookies certain functions of our website may become unavailable to you.

Analytics information

We use third-party analytics and reporting tools to help us gather information on purchasing transactions made through the Platform. These tools collect information sent by you, including but not limited to details relating to each transaction for the sale or purchase of seafood, such as quantities, types and price paid and location/s where a transaction takes place. The information will be used to report and evaluate the activities and transactions that are taking place through the Platform by you and other users for the purposes of providing reporting services to you as part of your use of the Platform. These services may include identifying the availability or best pricing for a certain type of seafood and the levels of transaction activity by location. All personal information that is used in the analytics and reporting services is aggregated and de-identified so as to preserve the anonymity of you and other users.

Why do we collect your personal information?

We collect, hold, use and disclose information, including your personal information to provide the Platform and our services, to improve and administer the Platform, and to allow you to use its functionalities. We may also use your information, including your personal information, for related reasons, including:

- to fulfil requests for products, services, Platform functionality, support and information for internal operations, including troubleshooting, data analysis, testing, research, statistical, and survey purposes and to solicit your feedback;
- to customise the content you see when you use the Platform. For example, we may provide you with services or information based on your location;
- to send promotional materials from us or on behalf of our trusted third parties;
- to improve and develop our Platform and conduct product development;
- to help us detect abuse, fraud, and illegal activity on the Platform;
- to communicate with you, including to notify you about changes in our services;
- to provide you with user support;
- to enforce our terms, conditions, and policies;
- to combine all the information we collect or receive about you for any of the foregoing purposes; and
- for any other purposes disclosed to you at the time we collect your information or pursuant to your consent.

Who might we disclose your personal information to?

We are committed to maintaining your trust, and we want you to understand when and with whom we may share the information we collect.

We may disclose information, including your personal information, to various third parties for any of the purposes identified above. The types of third parties with whom we exchange personal information include:

- **Authorised third-party vendors and service providers.** We share your information with third-party vendors and service providers that help us perform our business operations, including research, payment processing and transaction fulfilment, database maintenance, technology services, deliveries, email deployment, advertising, analytics, measurement, data storage and hosting, disaster recovery, search engine optimisation, marketing, and data processing.
- **Other users.** We may share your personal information with other users who are involved in a transaction with you, to facilitate the transaction including by sharing payment and delivery details.
- **Business partners.** We may share your information with our business partners so that we can make you special offers via the Platform.
- **Business transfers.** We may share your information in connection with a substantial corporate transaction, such as the sale of a website, a merger, consolidation, asset sale, or in the unlikely event of bankruptcy.
- **Legal purposes.** We may disclose information to respond to subpoenas, court orders, legal process, law enforcement requests, legal claims or government inquiries, and to protect and defend the rights, interests, safety, and security of Shore Trade, our affiliates, users, or the public.
- **With your consent.** We may share information for any other purposes disclosed to you at the time we collect the information or pursuant to your consent.

We store data, including personal information, in a cloud environment, with servers located in Australia. We will not send your personal information overseas without your consent.

What if we can't collect your personal information?

If you do not provide us with the personal information we need, some or all of the following may occur:

- we may not be able to provide you with our services including providing access to the Platform;

- we may not be able to provide you with targeted content and relevant information; and
- we may not be able to respond to your requests or inquiries.

How do we protect your personal information?

We take all reasonable steps to keep personal information protected from loss, interference, misuse or unauthorised access, modification or disclosure. These steps may include access controls, encryption, and secure premises. We store personal information in both physical and electronic form, sometimes with the assistance of third parties such as data hosting providers.

You should understand that no data storage system or transmission of data over the Internet or any other public network can be guaranteed to be 100 percent secure.

Please note that information collected by third parties may not have the same security protections as information you submit to us, and we are not responsible for protecting the security of such information.

Direct marketing communications

From time to time we may send you direct marketing communications regarding our goods, services and events, and the goods, services and events of our third party service providers.

We may contact you by electronic messages (e.g. email), by mail, and by other means, unless you opt out or we are subject to legal restrictions. You may opt-out of marketing communications, by contacting us using the contact details below.

How can you access and correct your personal information?

The accuracy of the personal information we hold and use is important to us. We take reasonable steps to ensure that the personal information we handle is accurate, complete and up-to-date. To help us keep your personal information accurate, please let us know if there are any errors or changes in your personal information.

If you have registered for an account you may access, review, and update certain personal information that you have provided to us by logging into your account and using available features and functionalities.

You can request access to the personal information we hold about you at any time by contacting our Privacy Officer via the contact details at the bottom of this policy. You may also request the correction of any of the personal information we hold about you. In most cases, we can help you promptly and informally with these requests. In other cases, we may need to verify your identity and ask you to make your request in writing.

From time to time, we may need to reject your request to access or correct the personal information we hold about you, if we believe it to be necessary and to the

extent allowed by law. We will provide our reasons if we deny your request for access to, or correction of, your personal information. Where we decide not to make a requested correction to your personal information and you disagree, you may ask us to make a note of your requested correction with the information we hold about you. We won't charge you for simply making a request to access or correct personal information. However, we may charge reasonable costs for carrying out your request.

How can you change what information you share?

Opting-out of advertising

You can opt out of marketing or advertising emails by utilising the “unsubscribe” link or mechanism noted in marketing or advertising emails.

Disable cookies

You may be able to refuse or disable cookies by adjusting your browser settings. Because each browser is different, please consult the instructions provided by your browser. Please note that you may need to take additional steps to refuse or disable certain types of cookies. For example, due to differences in how browsers and mobile apps function, you may need to take different steps to opt out of cookies used for targeted advertising in a browser and to opt out of targeted advertising for a mobile application, which you may control through your device settings or mobile app permissions. In addition, your opt-out selection is specific to the particular browser or device that you are using when you opt out, so you may need to opt-out separately for each of browser or device. If you choose to refuse, disable, or delete cookies, some of the functionality of the Platform may no longer be available to you.

How can you make a privacy complaint?

You can contact our Privacy Officer using the contact details at the bottom of this Privacy Policy if you have any concerns about how we have handled your personal information. We will respond to let you know who will be handling your matter and when you can expect a further response. We may request additional details from you regarding your concern, and we may need to engage or consult with other parties to investigate and deal with your issue. We will keep records of your request and any resolution. If you are not satisfied with the manner in which we have dealt with your complaint, you may contact the Office of the Australian Information Commissioner.

How to contact us

If you have any questions or comments about this privacy policy, please don't hesitate to contact us as follows:

Contact: Privacy Officer

Address: Shore Trade Pty Ltd, level 3/55 Pyrmont Bridge Rd, Pyrmont NSW 2009

Email: peter@manettas.com.au