

SPA DENTAL SYDNEY CBD – WEBSITE PRIVACY POLICY

This Website Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or otherwise collected by us, offline or online, including through our website: <https://www.spadentalkellyville.com.au/> Site). In this Website Privacy Policy **we, us** or **our** means Spa Dental Sydney CBD and ABN 30338348311.

Please note: This Website Privacy Policy only relates to personal information we collect through our Site. We may collect other personal information from you via other channels. Information collected via other channels will be collected subject to our dental services related privacy policy available here: <https://www.spadentalkellyville.com.au/>.

Personal information we collect via our Site

The types of personal information we may collect about you via the contact form on our Site include:

- your name;
- your contact details, including email address, and/or telephone number;
- images of you (if you choose to send these);
- the service about which your enquiry relates;
- your message to us;
- your preferences and/or opinions;
- your sensitive information as set out below; and
- any other personal information requested by us and/or provided by you or a third party.

The types of personal information we may collect about you via your use of our Site include:

- your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour;
- information about your access and use of our Site, including through the use of Internet cookies, your communications with our Site, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider; and
- additional personal information that you provide to us, directly or indirectly, through your use of our Site, associated applications, associated social media platforms and/or accounts from which you permit us to collect information.

The types of personal information we may collect about you where you call us using the click to call function on our Site, include:

- the IP address you are calling from; and
- any personal information you share with us on the call.

Note: We may record telephone calls. Where we do so the recording is only for training purposes and we will notify you at the beginning of the call. You will be provide with an easy opt-out.

We may collect these types of personal information directly from you or from third parties.

Collection and use of personal information collected via our Site

We may collect, hold, use and disclose personal information we collect via our Site for the following purposes:

- to enable you to access and use our Site;
- to allow you to contact and communicate with us via our contact form on the Site;
- to allow us to contact and communicate with you in response to a contact form you submit with us via the Site;
- for internal record keeping, administrative purposes, invoicing and billing purposes;
- for analytics, including to operate and improve our Site; and
- to comply with our legal obligations and resolve any disputes that we may have.

Disclosure of personal information collected via our Site to third parties

We may disclose personal information we collect via our Site to:

- third party service providers for the purpose of enabling them to provide their services, including (without limitation) IT service providers, data storage, web-hosting and server providers, maintenance or problem-solving providers, marketing or advertising providers and professional advisors;
- our employees, contractors and/or related entities;
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;
- courts, tribunals, regulatory authorities and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights; and
- third parties to collect and process data, such as [Google Analytics] or other relevant businesses. This may include parties that store data outside of Australia.

By providing us with personal information via our Site, you consent to the disclosure of your information collected via our Site outside of Australia and acknowledge that we are not required to ensure that overseas recipients handle that personal information in compliance with Australian Privacy law. You acknowledge that some overseas third parties may not be regulated by the Privacy Act and the Australian Privacy Principles in the Privacy Act and if any third party engages in any act or practice that contravenes the Australian Privacy Principles, it would not be accountable under the Privacy Act and you will not be able to seek redress under the Privacy Act.

How we treat sensitive information collected via our Site

Sensitive information is a sub-set of personal information that is given a higher level of protection under the Australian Privacy Principles. **Sensitive information** means information relating to your racial or ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation or practices, criminal records, health information or biometric information.

The type of sensitive information we may collect about you via our Site includes:

- the type of dental service you are enquiring about via our contact form on the Site [or via a telephone call made through the click to call option on our Site]; and
- any further health information you choose to provide (including images) when submitting the contact form [or when speaking with us via a telephone call made through the click to call option on our Site].

Provided you consent to sharing your sensitive information with us, your sensitive information may only be used and disclosed for purposes relating to the primary purpose for which the sensitive information was collected, including to respond to your enquiry via our Site with a relevant answer, such as a fee schedule or an appointment time for the dental service you are interested in.

Sensitive information collected via our Site may also be used or disclosed if required or authorised by law.

Please note: We may collect other types of sensitive information about you through other channels (such as in our clinic), and this sensitive information will be collected subject to our dental services.

Your rights and controlling your personal information collected via our Site

Choice and consent: Please read this Website Privacy Policy carefully. By providing personal information to us, you acknowledge this Website Privacy Policy sets out how we will collect, hold, use and disclose your personal information via our Site. You do not have to provide personal information to us, however, if you do not, it may affect your use of this Site or the products and/or services offered on or through it.

Information from third parties: If we receive personal information about you from a third party related to your use of our Site, we will protect it as set out in this Website Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

Anonymity: Where practicable we will give you the option of not identifying yourself or using a pseudonym in your dealings with us via our Site. For example, where you submit an enquiry via our contact us form you may choose to use a pseudonym. Where we provide our dental services to you it may be impracticable to allow you to remain anonymous or use a pseudonym. Please refer to our dental services privacy policy which relates to the provision of our dental services.

Restrict: If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by contacting us using the details below.

Access: You may request details of the personal information that we hold about you. An administrative fee may be payable for the provision of such information.

Correction: If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to correct any information found to be inaccurate, incomplete, misleading or out of date.

Complaints: If you wish to make a complaint about how we have handled your personal information, please contact us using the details below and provide us with full details of the complaint. We will

promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your complaint.

Unsubscribe: To unsubscribe from our e-mail database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

Storage and security of personal information collected via our Site

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

We cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that the personal information we collect will not be disclosed in a manner that is inconsistent with this Website Privacy Policy.

Cookies and web beacons we use on our Site

We may use cookies on our Site from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do allow third parties, such as Google and Facebook, to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. If and when you choose to provide our Site with personal information, this information may be linked to the data stored in the cookie.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our Site.
- **Analytical/performance cookies.** These are cookies that allow us to recognise and count the number of visitors to our Site and to see how visitors move around our Site when they are using it. This helps us to improve the way our website works, for example, by ensuring that you are finding what you are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our Site. This enables us to personalise our content for you and remember your preferences (for example, your region).
- **Remarketing cookies.** These are used to show our advertisements to you on websites across the Internet.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

We may use web beacons on our Site from time to time. Web beacons (also known as Clear GIFs) are small pieces of code placed on a web page to monitor the visitor's behaviour and collect data about

the visitor's viewing of a web page. For example, web beacons can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page.

Links to other websites

Our Site may contain links to other websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Website Privacy Policy.

Amendments

We may, at any time and at our discretion, vary this Website Privacy Policy by publishing the amended Website Privacy Policy on our Site. We recommend you check our Site regularly to ensure you are aware of our current Website Privacy Policy.

For any questions or notices, please contact our Privacy Officer at:

Spa Dental Sydney CBD ABN 30338348311

Email: info@spadentalsydneycbd.com.au

Last update: 10/9/19