



Flybuys Privacy Policy

Effective 01 December 2021

What's new

At Flybuys, your privacy is important to us. We want to provide you with a clear and current explanation of how we collect, use and share your personal information.

Some of the key changes to the Privacy Policy are:

- From 01 December, when you shop at a select Flybuys partner and use your Flybuys card or member number, your email will be shared with that partner. Only a select list of partners are included in this change. When your email is shared with a partner, this will allow you to receive tailored email communications and offers direct from them. Before we provide your email, you can opt-out of partner email sharing via the Communication Preferences section of your Account Details on the Flybuys website or app. After your email is shared, you can opt out of communications directly with each partner.
- We provide you with more information about how we collect and use information about your purchases (including where you have not swiped your Flybuys card).
- We describe in more detail how we collect and handle data when you interact with us or our partners via online channels, including websites and social media platforms. We also describe how we and our partners use cookies and other technologies on those online platforms to collect data.
- We provide you with more information about how we share your personal information with program partners and the purposes for which they may use it, including so they can provide you with more personalised offers and advertising on their platforms.
- We describe how our "Unpacked by Flybuys" business uses de-identified data to deliver services to third party advertisers, including to provide you with targeted advertising on their platforms. We don't share any of your personal information with third parties in connection with these services.
- We provide updated information about how we handle and share your personal information for law enforcement and regulatory purposes, including to comply COVID-19 contact tracing requests.



1. Overview

At Flybuys (“Loyalty Pacific Pty Ltd”), we respect the privacy of Personal Information in our care, and we collect and handle Personal Information in accordance with the Privacy Act 1988 (Cth) (including the Australian Privacy Principles) and all other applicable Australian privacy laws.

‘**Personal Information**’ has the meaning given in the Privacy Act, but in broad terms, means information which identifies you as an individual or from which you can be reasonably identified.

This Privacy Policy relates to Personal Information we collect and handle about Flybuys members and visitors to our website, apps, social media and other digital services, including those of our Participants. Our personnel and job applicants should contact our People Experience team for details about the privacy of their Personal Information.

The Flybuys program is a loyalty marketing program provided by us in collaboration with Coles, Wesfarmers and our Participants. ‘**Participants**’ refers to those companies (and other persons) which have agreed with us to provide Flybuys members with certain benefits (including issuing points to Flybuys members under the Flybuys program and/or providing rewards in exchange for points). Flybuys is not responsible for the privacy practices or policies of Coles, Wesfarmers, and our Participants, and we recommend that you visit their websites for more information about their privacy practices and policies.

If you do not agree to the terms of this Privacy Policy you may terminate your Flybuys membership at any time.

This Privacy Policy is current as of the date noted above. We may make changes to this Privacy Policy from time to time, in which case we will notify you of the change by displaying an updated version on our website and other digital channels, and/or by sending it to you via email.

2. Types of Personal Information Collected

The types of personal information we collect include:

- name;
- contact details (e.g. address);
- identification information (e.g. date of birth);
- household details (e.g. the number of people living at a household and their ages);
- payment and transaction details/history (including information about payment cards linked to Flybuys and associated transactions) However, we do not collect or store credit card or debit card numbers;
- points accrual and reward details;



- authorisations;
- records of your communications and interactions with us ;
- data related to your activities on Online Channels (as defined in Section 5.3 below) collected via tracking technologies such as cookies and other anonymous identifiers (in many cases, we will not be able to reasonably identify a particular individual from this information but where we can do so, this Privacy Policy applies, as well as our obligations under the Privacy Act); and
- details and history of preferences, interests and behaviour relating to transactions, products, services.

We collect from Participants information about your purchases when you haven't presented your Flybuys card, but where we were able to identify from payment card information that you have made the purchase. We use this information on an anonymised, aggregated basis for modelling and research purposes. We do not in any circumstance collect or store credit card or debit card numbers.

Anonymity

You have the option to engage with us anonymously. However, we can only offer anonymity where it is practical to communicate with you anonymously, for example, for general queries raised with the Flybuys Service Centre which don't require identity verification to safeguard the security of your account. If you choose to interact with us anonymously, we may not be able to provide our services to you without your Personal Information. For example, we may not be able to issue points, let you redeem points for awards, manage your membership, or contact you.

Providing us with information about someone else

Where you provide us with Personal Information about someone else you must have their consent to provide their Personal Information to us.

Unsolicited Personal Information

You must not send any Personal Information to us unless we've requested it from you. If we receive unsolicited Personal Information, we'll handle it in accordance with the Privacy Act.

3. How Personal Information is collected

3.1 Collection of Personal Information by us and Participants

We may collect your Personal Information, and that of any additional members that have added themselves to your account with your approval, from your interactions and transactions with us and Participants and Coles and Wesfarmers group companies, including for example when you:

- use your Flybuys card or number or associated identifiers such as payment cards;



- make a purchase in store;
- place an order online;
- make a non-cash payment;
- participate in a promotion, competition, or survey;
- register for services; including services provided by Participants; or
- use Online Channels.

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

3.2 Collection of Personal Information from third parties

We may also collect personal information from third parties including:

- public sources and registers;
- information service providers (e.g. to help us ensure that the personal information we hold is accurate, up to date and complete, and for data integrity purposes);
- providers who administer Coles-branded products and services such as payment cards and insurance;
- anyone authorised to act on your behalf;
- Participants, Coles and Wesfarmers group companies;
- service providers who help us to administer the Flybuys program; and
- Flybuys media and advertising partners, to enable us to provide them with aggregated and de-identified data and services for targeted advertising purposes (as further described in the “Targeted Advertising” section below).

3.3 Collection of data via Cookies and other technologies

We may use “cookies” on Online Channels to collect data. A cookie is a small piece of information stored on your device or computer when you interact with online content (e.g. websites, apps and emails). Cookies are used to identify and interact more effectively with your device, as well as to collect and store data.

We may also use other tracking or data collection technologies across Online Channels including web beacons (which may operate in conjunction with cookies), Flash local stored objects, and JavaScript.



4. Storage and security of Personal Information

We hold personal information electronically and in hard copy form, both at our own premises and with the assistance of our service providers. We implement a range of measures to protect the security of that personal information. Examples of these measures include:

- access to Personal information is controlled through identity and access management systems;
- staff members are bound by internal information security policies and are required to keep Personal Information secure at all times;
- we take steps to protect Personal Information in accordance with the Office of the Australian Information Commissioner's *Guide to securing personal information*; and
- we also take measures to destroy or de-identify Personal Information that is no longer needed for any lawful purpose.

5. Purposes for handling Personal Information

5.1 Registration and use of the Flybuys loyalty program

We handle your Personal Information in connection with providing, administering, improving and personalising the Flybuys program, Flybuys products and services, and those provided by Participants, Coles, and Wesfarmers group companies. This can include:

- to register and service your membership account, including keeping your information up-to-date, and verifying your identity;
- to communicate with you about our and our Participants' products, services and promotions (including via direct marketing as described below);
- to help us and our Participants improve our products and services, including conducting product and market research;
- to improve our understanding of your interests and behaviour in relation to products, services, and offers;
- to improve our operational processes to enhance your customer experience;
- to respond to your feedback, queries or concerns; or
- investigative, fraud and loss prevention activities.



5.2 Offers and marketing communications

We may provide offers, marketing communications and targeted advertising to you on an ongoing basis by telephone, electronic messages (e.g. email), websites, social media and other Online Channels, and by other means. These communications may relate to the products and services we, Participants, Coles, and Wesfarmers group companies provide, and other products which we think may be of interest to you.

If you have purchased a product or service from a Participant and scanned your Flybuys card, that Participant may also provide you with offers and marketing communications, including by email or other form of electronic messages. These communications may relate to products or services that the Participant provides and which the Participant thinks may be of interest to you.

You can call us on 13 11 16 or login to your Flybuys account at flybuys.com.au at any time to opt out of electronic and telephone direct marketing communications from us. You can also use the unsubscribe facility provided in Flybuys electronic marketing communications.

If you elect to opt out, you will still receive service based communications relating to your Flybuys membership and account, as well as other information that we are required to send you by law, such as changes to our terms and conditions and notifications relating to your transactions and rewards purchases.

To opt-out of any marketing communications received from Participants, you can use the unsubscribe facility provided in the Participant's electronic marketing communication.

5.3 When you interact with us online

You may interact with us, Participants, Coles or Wesfarmers group companies, our service providers or our other business partners through a range of digital and online channels, including:

- websites (e.g. flybuys.com.au or the websites of Participants);
- apps;
- email;
- online advertisements;
- IPTV; and
- social media profiles,



("Online Channels").

We may collect and handle your Personal Information and other data collected via these Online Channels for a range of purposes, including to provide a consistent experience, personalise your use of each of those Online Channels and to provide targeted marketing.

Some of the information we collect from these Online Channels is not related to an individual. In many cases, the information relates only to a device or is of an aggregated or statistical nature, and we will have no way of knowing the identity of the user. In other cases, we may associate information about your use of Online Channels over time with your Personal Information, for example, when you have logged in to your Flybuys account or followed a link sent to you by email.

How we use cookies and anonymous identifiers

We may use cookies and other technologies to track your access to and use of Online Channels, and to customise and improve your interactions with them. Examples of how we use cookies and other technologies include:

- to maintain the continuity of your browsing session (e.g. to remember the items in your shopping cart);
- to remember your details and preferences when you return;
- to record information about your interactions with the Online Channels including information about software versions used, device types, 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).

Some of these cookies and other technologies are consistent across various Online Channels, allowing us and the other providers of those Online Channels to understand you better and provide a more consistent experience across those Online Channels.

Third party cookies and data collection

In some cases, we may receive data from our service providers which is collected via third party cookies and other technologies used on the Online Channels. We may use this data in connection with activities like managing, administering and expanding the Flybuys program, surveys, targeted advertising, website analytics, and email campaign management.

The data received by these third party cookies and other technologies that are used on Online Channels, is collected directly by the relevant third parties and is subject to the individual privacy policies of those third parties.



5.4 Third party targeted advertising

In partnership with media, technology and advertising companies, Flybuys may provide aggregated audience segments to advertisers which are based on de-identified member data. This enables advertisers to provide you with more personalised and targeted advertising when you use our business partners' websites, social media and other platforms.

Flybuys also provides partners and advertisers with anonymised analysis, reporting and insight services related to their use of Flybuys data for advertising.

Flybuys does not share any of your Personal Information with partners or advertisers in connection with these advertising services.

We may receive cookie data, device information or other anonymous identifier information from our partners to enable us to provide these services. In some cases, Flybuys may be able to connect this data back to individual Flybuys members, meaning that we will handle this data as Personal Information in accordance with this Privacy Policy. We do not retain or store this data for longer than is necessary for us to provide services to our partners and advertisers, and we do not use this data for any other purpose.

How to opt out of targeted advertising

The third party platforms that use Flybuys aggregated audience segments include those offered by Google, Yahoo!, Adobe, The Trade Desk, LiveRamp, Amobee, MediaMath and Facebook.

You can find information on how to opt out of receiving targeted advertising on these platforms by reading the individual privacy policies of those platforms. You may need to opt out separately from each platform. The website www.youronlinechoices.com/ie/your-ad-choices allows you to opt out of some online targeted advertising and provides further information about how online targeted advertising works.

5.5 Regulatory purposes and to facilitate our corporate activities

We may also handle your Personal Information:

- to protect our lawful interests and facilitate purchases and potential purchases of our businesses;
- to comply with any request for information made by a regulator, court, government entity, health department or contact tracing agency (including any requests to provide information for COVID-19 contact tracing); or
- as otherwise permitted or required by law.



6. Sharing of Personal Information

6.1 Sharing with Participants

We may share and combine Personal Information with Participants (and Participants may share and combine such Personal Information with other Participants that are part of the same corporate group):

- to allow Participants to engage with you and provide you with more personalised and targeted advertising when you use the Participant's website, third party websites, social media, apps and other platforms;
- to allow Participants to personalise the communications, marketing offers, customer surveys and trading updates that they send to you;
- to enable Participants to improve product offerings, service offerings, advertising and offers based on member shopping and browsing habits;
- for the purpose of developing aggregated insights about the preferences of Flybuys members who shop at a Participant;
- for the purpose of analytics including for insights and strategic and operational decision making;
- for product safety-related matters (including recalls);
- where you have provided express or inferred consent to us or a Participant; and
- for any other purpose described in this Privacy Policy.

Participants may also collect Personal Information directly from you (and from other sources set out in their respective privacy policies) and may combine the Personal Information that they receive from Flybuys with other Personal Information they collect from or about you. That combined Personal Information may be shared by a Participant with us, and we may share that combined Personal Information with other Participants.

Participants will handle your Personal Information in accordance with their privacy policies (which can be located on their respective company websites) and in accordance with the Privacy Act 1988 (Cth) (including the Australian Privacy Principles). This may involve the Participant retaining Personal Information about a Flybuys member after that person has ceased to be a Flybuys member (or after the Participant has ceased to be a Participant) if required by law.

6.2 Sharing with service providers and third parties

We may share your Personal Information with service providers and other third parties engaged to assist us with conducting the Flybuys program or providing services and products, including companies that assist us with:



- technology services including application, development and technical support, processing, storing, hosting, and analysing data;
- processing payments;
- communicating our offers and promotions to you;
- product development and market research; and
- administrative services, including mailing services, printing, archival, and contact management services.

If you've chosen to share your Flybuys account with one or more additional members, some of your Personal Information may be visible to those additional members in certain circumstances (e.g. when those additional members view your shared Flybuys account details via Online Channels).

We may also share your Personal Information with any potential purchaser of the Flybuys business (or part of the Flybuys business) and related professional advisors.

6.3 Sharing with regulators and courts

We might share your personal information with law enforcement, regulators, courts, government entities, health departments and contact tracing agencies for public health, regulatory and enforcement purposes including:

- in order to respond to lawful information requests from courts, regulators, law enforcement, government entities and health departments;
- to protect our lawful interests; and
- to provide information for COVID-19 contact tracing purposes, in which case you may be contacted by a health department or contact tracing agency.

6.4 Sharing overseas

The third parties to whom we disclose Personal Information may be located in Australia and other countries including the Philippines and the United States of America. From time to time, the countries to which we send Personal Information may change. We take steps to ensure that all our service providers are obliged to protect the privacy and security of your Personal Information in accordance with the standards that apply in Australia including that they only use Personal Information for the purpose for which it is disclosed.



6.5 Links to third party sites

Our website, social media pages and apps may contain links to other sites. We are not responsible for the privacy practices or policies of those sites and recommend that you review their privacy policies.

7. Procedures for access and correction of your Personal Information

If you wish to access or correct any personal information we hold about you, please contact us as set out below.

When making an access request, please provide as much detail as you can about the particular information you seek in order to help us retrieve it. Under the Privacy Act and other relevant laws, we are required to provide a written response outlining our reasons if we refuse your request.

Where we decide not to make a requested correction and you disagree, you may ask us to add a note of your requested correction to the information that explains your correction request.

8. Questions and complaints

If you have any complaints or concerns about this Policy, or our handling of your Personal Information, you can contact us as set out below.

Once a complaint or concern has been lodged, we will let you know who will be handling your matter and when you can expect a full response within 30 days. If you are not satisfied with our response, please let us know and we will investigate further and respond to you.

Complaints should be directed to us in the first instance. If you are still not satisfied, you can contact the Office of the Australian Information Commissioner, whose contact details are set out below.

Contact us

Queries regarding privacy should be directed to the Flybuys Privacy Officer:

Email: privacy@flybuys.com.au

Phone: 13 11 16 - Monday to Friday, 9am-7pm AEST, excluding national public holidays

Post: PO Box 12125, A'Beckett Street Melbourne, VIC 8006

The Flybuys Privacy Policy can be found on flybuys.com.au



Office of the Australian Information Commissioner

Post: GPO Box 5218, Sydney NSW 2001

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Web: www.oaic.gov.au

9. Additional Privacy Information

In addition to this Privacy Policy, our Participants, Coles, and Wesfarmers group companies have their own privacy statements and other terms which provide further information about the handling of your Personal Information that has been shared with these third parties. We are not responsible for the privacy practices or policies of these third parties and recommend that you review their respective privacy policies.

For information about privacy generally, you may contact the Office of the Australian Information Commissioner on the contact details noted above.