

# PRIVACY POLICY

Lyonet Australia Limited ('we', 'us', 'our') takes the protection of your personal data very seriously and strive to make the use of our services secure. We are also committed to observing all laws related to the protection of personal data. This Privacy Policy describes what data we collect about you, how we use and to whom we disclose it, the purposes for which we do this, how you can access and request correction of the personal data we hold about you, how to complain about a breach of your privacy and how we protect your data.

In Australia, the applicable data protection legislation under which your personal data will be collected and processed is the *Privacy Act 1988* (Cth) and the Australian Privacy Principles.

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## 1. Application of this Policy and updates

This Policy applies to the Lyonet Marketer operation and the websites available at <http://www.lyconet.com>. Please note that this refers to additional websites, even to those of other countries, to which other data protection regulations and privacy policies may apply. We may update this Policy from time to time if our practices or legal requirements change, and as we continue to develop our websites to improve our services to you. The latest version of this Privacy Policy will appear on our website, as set out above and you should check the website frequently to see the current Policy. We may send you reminders or updates of any changes that may materially affect the privacy of individuals to whom this Policy applies, we will endeavour to give notice of such changes to individuals concerned.

## 2. What data is collected and recorded

The types of personal data we collect and record about you in the course of your operation as a Lyonet Marketer includes any data that may be attributed to you directly or indirectly (e.g. via your membership number) or that is reasonably capable of identifying you. This includes your member ID, your full name, title, gender, date of birth, postal address, address coordinates (longitude and latitude), your telephone number(s), fax number, e-mail address, bank details and data regarding your shopping behaviour associated with your myWorld membership (purchase date, place of purchase, time of purchase, purchase amount, currency, shopping cart, industry, type of purchase – online/offline, in SME, in key account, with voucher, with myWorld Card). If you have given us this information, we will process the number and type of ID document presented, full name on the ID document, your nationality, place of birth, if available your personal number, your height, date of issue and expiry as well as the issuing authority of the ID, signature on the ID, the machine-readable zone, ID photo, selfie and liveness of the selfie. In addition, we process your t-shirt size and food preferences if you have provided this information as part of an event participation,

## 3. How data is collected

Wherever possible we will collect your personal information directly from you, such as when you contact us, register to become a Marketer and your activity in connection with the Marketing Agency, including when purchase good or services from Loyalty Merchants. We may also collect data about you from other third parties, as described below.

## 4. Cookies and web tracking

Our websites use cookies, which are small text files saved on your computer that can be accessed again later. Cookies enable you to log in to our services and help us customise our website for you. Most internet browsers are pre-set to accept cookies. If you prefer not to receive cookies, you can adjust your internet browser to refuse cookies or to warn you when cookies are being used. However, if you disable cookies, this may affect the functionality of our website you use.

You can also use part of our website without registering or logging in. In this case, certain information will also be recorded automatically to enable us to collect statistical data regarding the use and efficiency of our website and to adapt it to suit the needs of our users. We therefore record and process information about your IP address, the time and length of your visit, the number of visits, your use of online forms, your search settings, your view setting, and your favourites setting on our website. Cookies are stored for a range of different periods. The majority of the cookies we use are deleted automatically as soon as you leave the website ("session cookies"). We make a record of every time our website is accessed and every time a user opens one of the files stored on the website. The cookies set by us are solely for our information and are processed by myWorld International AG, Grazbachgasse 87-91, 8010 Graz on behalf of Lyonet Australia Limited to evaluate the information collected.

We use JavaScript to record your usage behaviour on our website in order to adapt our web services to the needs of our users. In doing so, we determine your browser type, location, time, and duration of your use, URL, page name, and the website that referred you to our page. You can stop us from recording this data by disabling JavaScript directly in your browser.

We also use the following tools:

## **Google Analytics**

This is a web analytics tool by Google Inc., 1600 Amphitheatre Parkway Mountain View, CA 94043, USA, hereinafter referred to as "Google", to record your online activities on our site and to determine how many users are visiting us, what contents of our page are viewed, and how many times. The

evaluation is done anonymously. Google Analytics cookies, including the Google Analytics tool “anonymous IP address” and usage data, are usually transmitted to a Google server in the United States and stored there. For further information, please refer to <https://support.google.com/analytics/answer/6004245?hl=en>. At <https://tools.google.com/dlpage/gaoptout?hl=en>, Google Analytics offers the option to opt out of data collection.

#### **Matomo Analytics Platform**

We record your online activities on our site and determine how many users visit us on the Internet and which content of our site is viewed and how often. The evaluation is anonymous. The cookies are stored on your computer. For more information, please visit [Privacy Policy - Analytics Platform - Matomo](#).

#### **Google AdWords**

This is used to record website visits for advertising purposes (remarketing) in Google and in the Display Network. When you visit a website, your browser saves cookies that allow you to be recognised as a visitor when you visit websites that belong to Google's advertising network. On these pages, ads that relate to content that you previously viewed on other websites that use Google's remarketing function can be presented to you as a visitor. You can opt out of data collection by Google AdWords on the website <http://www.google.com/settings/ads>.

#### **Google AdWords conversion tracking**

We use this to generate conversion statistics that measure the effectiveness of our online advertising campaigns. The conversion tracking cookie is set when a user clicks on an ad placed by Google. According to Google's privacy policy, no personal information is processed. If you do not wish to participate in tracking, you can opt out of this usage by disabling the Google conversion tracking cookie in the usage settings of your Internet browser.

#### **Salesforce Marketing Cloud**

We use this to record your behaviour on our website to optimise our product offering. It helps us determine how many users visit us in the Internet, which content of our site is viewed, and how often. The evaluation is done anonymously and is used automatically by predictive intelligence to improve the presentation of our product offering. For registered members, the user-related behaviour on the website is recorded to improve the user experience and is used to display the relevant content. Salesforce cookies are usually delivered to a Salesforce server in the United States and stored there.

#### **Microsoft Application Insights**

Application Insights is a service from Microsoft that enables us to monitor and improve the performance and usability of the Website. The service stores and analyses anonymised telemetry data (Number of pageviews, page load times, exceptions encountered and tracing of AJAX dependencies). The cookies (-ai\_user, ai\_session) are usually transmitted to a Microsoft server in the USA and stored there.

#### **Hotjar**

We collect non-personal information, including standard internet log information and details of your behavioural patterns when you visit our website. This is done to enable us to provide you with a better user experience, to identify preferences, to diagnose technical problems, to analyse trends and to improve our website.

The following information may be collected related to your device and browser: device's IP address (captured and stored in an anonymized form), device screen resolution, device type (unique device identifiers), operating system, browser type, geographic location (country only), and preferred language used to display our website. The following information is collected related to your user interaction: mouse events (movements, location and clicks), keypresses.

For a sampling of visitors, Hotjar also records information which is collected from our website: referring URL and domain, pages visited, geographic location (country only), preferred language used to display our website, date and time when the website pages were accessed.

You may opt-out from having Hotjar collect your information when visiting our website at any time by visiting the [Opt-out](#) page <https://www.hotjar.com/opt-out> and clicking 'Disable Hotjar'.

#### **Yandex Metrika**

This is a web analytics tool from YANDEX LLC, with a registered office located at 16 Lva Tolstogo St., Moscow 119021, Russia, and its affiliate, Yandex Oy, with a registered office at Moreenikatu 6, 04600 Mantsala, Finland. We use this tool to log your online activity on our website, to find out how many users visit us and to record the number of times they access each page. This process is anonymous. The cookies are stored on your computer. For more information, please visit [https://yandex.com/legal/metrika\\_agreement/](https://yandex.com/legal/metrika_agreement/)

#### **Functional Cookies**

Due to the dynamic structure of our website, additional cookies only for short-term use may be used, particularly for temporary promotions. These cookies are not personalised but are exclusively functional in nature. To offer you full transparency, we use an external provider who regularly checks our websites and the respective active list can be pulled up [here](#).

Please note that the standard Internet browsers accept cookies according to the default settings. You can also set your browser to refuse all or certain cookies or to ask you before a new cookie is received. The relevant instructions are provided by most browsers under the “Help” menu item in the menu bar. There you will also find out how to delete the cookies you have already received.

Please note that you may not be able to use all the features of our websites if you do not accept any or only some cookies.

By using our website, you agree that the cookies and tools mentioned above may be used.

### **5. Conversion measurement using the Facebook visitor action pixel**

With your consent, which we seek when you click on the 'I accept cookies' button on Facebook we use the “Facebook Pixel” by Facebook Inc., 1601 S. California Ave., Palo Alto, CA 94304, USA (“Facebook”) on our website. This is a cookie, i.e. a small text file that is stored on your computer and can be accessed again later. With its help, actions of users can be tracked after they have seen or clicked on a Facebook ad. This allows us to track the effectiveness of Facebook ads for statistical and market research purposes. The data collected in this way is anonymous to us, in other words, it does not provide any information on the identity of the users. However, the data is stored and processed by Facebook, so that a connection to the

respective user profile is possible and Facebook can use the data for its own advertising purposes, according to the Facebook Data Policy (<https://www.facebook.com/about/privacy/>). You can allow Facebook and its partners to display ads on and off Facebook. A cookie may also be stored on your computer for these purposes.

By using the website, you agree to the use of the visitor action pixel.

## **6. Sharing with social media sites**

The website contains "Share" buttons for the social networks **Twitter Inc.**, 795 Folsom St., Suite 600, San Francisco, CA 94107, USA, **XING**, which is operated by XING AG, Dammtorstrasse 30, 20354 Hamburg, Germany, **LinkedIn** Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA, and **Facebook**, 1601 South California Avenue, Palo Alto, CA 94304, USA. In addition, there is also a "Share" button for e-mail. The "Share" buttons can be recognised by their respective logos.

All "Share" buttons are set up in compliance with data protection requirements. A direct connection between your browser and the server of the operator of the respective social network is established only when you click on the respective "Share" button on this website (and only then). According to the operators of the social networks mentioned, no personal data is collected by the social networks without a click on the respective "Share" button. Only data of logged-in members, including the IP address, is collected and processed. If you do not wish to associate your visit to our website with your user account of the respective social network, please log out of the user account of that social network.

Here we wish to point out that, as the provider of the website, we do not receive any information regarding the content of the data transmitted and its use by the social networks. For more information about the use of data by the social media networks, please refer to the privacy policies of the social networks mentioned.

## **7. Use and disclosure of data**

We collect and process the personal data that you provide to us when you register as a Lyconet Marketer and in the course of your activity in connection with the Marketing Agency, and to fulfil our contractual obligations to you.

For example, we use your data to communicate with you, to verify your identity and provide you with your personal member area on the Lyconet website, to process your enquiries and orders, and provide you with our services. In addition, we also use your data to calculate and allocate to you the Benefits to which you are entitled as a result of your activities in connection with the Marketing Agency, to identify offers that suit your interests, conduct surveys including satisfaction surveys, operate hotlines, and process transactions and also to comply with our legal obligations.

We may also need to share your personal data with certain service providers we use to help provide our services, to communicate with members, to manage our online presence and data processing, and to maintain and manage our membership database. We have selected these service providers carefully to ensure that they process the data lawfully and securely and we require them to use your personal data only according to our instructions for specific purposes and in accordance with the applicable privacy laws.

Your personal data may be also shared within the Lyconet Group and the myWorld Group of companies to conduct our business activities. Your data is used by Lyconet Australia Limited as the contractual partner of the members. Lyconet Australia Limited uses myWorld International AG as their service provider.

To the extent necessary for the provision of a specific service to you, we will provide the Loyalty Merchant offering the relevant benefit with the personal data required for this purpose. All participating Loyalty Merchants are required under their agreement with us to use your personal data only for the specific purpose in each case and according with applicable data protection and anti-spam laws.

For purchases made on the website, the following data may be passed on to the payment service provider named in the respective payment process using the 3D Secure v2 process as part of fraud prevention when a selected payment method is processed by an external payment service provider: First name and last name, birthday, gender, last date on which changes were made to the member ID (limited to billing and delivery address changes), changes to account data or user data, registration date, whether a password for the member ID exists and when the password was last changed, data on purchasing activity on our website (number of payment attempts in the last 24 hours, number of payment attempts in the last year, number of purchases in the last 6 months), company data (company wording and tax identification number), contact data (email address, cell phone number, telephone number).

In order to carry out a know-your-customer (KYC) process, which is necessary in some cases, we use the Klippa App B.V., Lübeckweg 2, 9723 HE Groningen, Netherlands, as a service provider. These are OCR services (optical character recognition) for analyzing ID documents. Apart from the scanning process, Klippa does not store any of the transmitted personal data. For more information, see OCR Software - [Automatic Text Recognition for Receipts and Invoices \(klippa.com\)](#).

We will not otherwise share your personal information unless you have given us your consent or we are required or authorised by law or an Australian court/tribunal.

If you have also given us your separate consent to do so, we or our service providers (including myWorld International AG) on our behalf may use and disclose your personal data to contact you by electronic messages (e.g. e-mail, SMS, or push notification), by fax, by telephone, or by letter to inform you about products, offers and promotions of our Loyalty Merchants.

As part of your participation in the Loyalty Merchant's individual customer loyalty programme we will also, with your express consent, provide these Loyalty Merchants that you expressly nominate, certain information about you (including your first name, surname, title, gender, date of birth, email address, postal address, address coordinates (longitude and latitude), telephone number(s), fax number, customer number) and data concerning your historical and ongoing purchases made from the specified Loyalty Merchant (including date of purchase, purchase amount, currency, invoice number and location). With your consent the Loyalty Merchant will use this data for the marketing purposes. You can withdraw your consent to the sharing of your data with any Loyalty Merchant at any time.

You may opt-out of receiving our marketing communications or sharing your data with Loyalty Merchants at any time by contacting us on the details below. Any direct marketing message we send will also contain a mechanism in the message to enable you to opt out of receiving direct marketing at that time.

#### **8. Data security and transferring data (including overseas)**

To protect your data, we use measures that include encryption for data transmission (SSL encryption), firewalls, hacker defence programs, and other state-of-the-art security measures. For e-mail communication, we can only guarantee the security of the data according to the current state of the art.

When we share your personal data with third parties and service providers we ensure appropriate data security measures are in place within the Lyconet Group. The companies in the Lyconet Group are also required by us to use your personal data only for the specific purpose in each case and according to applicable data protection laws. Some of our service providers may be located overseas, including the manager of our customer database and the servers on which your data is stored on our behalf.

The Lyconet Group operates internationally. Our business activities, management structures, and our technical infrastructure transcend national borders. Therefore, we also transfer your personal data overseas. We may transfer your data overseas to our related companies located in member states of the European Economic Area and to Switzerland, where we reasonably believe there are laws which protect your personal data in a substantially similar way to data protection laws that apply to our processing of your personal data and where there are mechanisms you can use to enforce those protections. We may also transfer your data to Hong Kong and your data may be stored on our behalf by Amazon Web Service on servers located in Brazil.

Please contact us immediately if you believe that any of the personal data that you have given us or we hold about you may have been compromised so that we can investigate the matter as soon as possible.

#### **9. How to access to and seek correction of your data**

You may access personal data we hold about you (subject to certain legal exceptions) and seek correction of the data, by writing to us or contacting us at any time at the contact details. You will not be charged for making such a request.

We will need to verify your identity before we can give you access to or correct your personal data. We will promptly acknowledge receipt of your request, and we will endeavour to respond to your request within a reasonable time.

We may refuse access to some or all of your personal data if required or permitted by law, such as where providing access would have an unreasonable impact upon the privacy of other individuals and we may decline to correct your data. If we do, we will explain why in writing and how to complain if you are not satisfied with the decision.

#### **10. How to make a privacy complaint**

If you believe that we have handled your personal data inconsistently with this Policy or our applicable data protection obligations, you can make a complaint at the contact details below. We will acknowledge receipt of your complaint promptly and may need to verify your identity and ask you to provide us with further information to enable us to investigate your complaint.

We will investigate your complaint and notify you of our decision and offer any resolution that we consider appropriate within a reasonable period of time. If you are not satisfied with our resolution of your complaint, you can contact the local data protection authority whose details are:

Office of the Australian Information Commissioner

GPO Box 5218

SYDNEY NSW 2001

Telephone: 1300 363 992

[www.oaic.gov.au](http://www.oaic.gov.au)

#### **11. Right of withdrawal of consent to use data**

You have the option, at any time, to withdraw your consent regarding the future use of your personal data used on this website without stating a reason. By withdrawing your consent, we no longer shall have the right to use your data. If you wish to withdraw your consent, *please send a written declaration (by letter, fax, or e-mail) to the following address:*

Lyconet Australia Limited  
Level 18, 324 Queen Street,  
Brisbane, QLD 4000 Australia  
+61 2 9007 1000  
E-mail: [international@lyconet.com](mailto:international@lyconet.com)

#### **12. Lyconet contact details**

Please contact us at this address if you have any questions about this Policy or regarding the use of your personal data or if you wish to request access to your data to update or correct your data, or you wish to opt out of direct marketing or to make a complaint.

Lyconet Australia Limited  
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Brisbane, QLD 4000 Australia  
+61 2 9007 1000  
E-mail: [international@lyconet.com](mailto:international@lyconet.com)

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