



Spriggy Mobile Privacy Policy



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1. Introduction

In this Privacy Policy, 'Spriggy Mobile', 'we', 'us' and 'our' means Rivva Mobile Pty Ltd (ABN 35 674 423 333) and our related bodies corporate.

This Privacy Policy sets out our commitment to protecting the privacy of your Personal Information provided to us, or otherwise collected, used, stored, handled or disclosed by us when providing the Spriggy Mobile telecommunication service, products, associated websites, content, firmware, devices, software applications, app features, add-ons and APIs (the '**Service**' or the '**Services**') or when otherwise interacting with you in accordance with the Australian Privacy Principles set out in the Privacy Act 1988 (Cth) (**Privacy Act**).

By using our Services or in providing your Personal Information to us, you consent to our collection, use and disclosure of your Personal Information in accordance with this Privacy Policy and any other arrangements that apply between us.

We may change this Privacy Policy from time to time by publishing the updated version on our website. We encourage you to check our website periodically to ensure that you are aware of our current Privacy Policy.

2. Definitions

In this Privacy Policy:

Personal Information has the meaning given in the Privacy Act and includes information or an opinion about an individual that is reasonably identifiable. For example, this may include your name, age, gender, postcode and contact details.

Sensitive Information has the meaning given in the Privacy Act.

3. What Personal Information we collect

We only collect Personal Information from you when it is reasonably necessary to provide you with our Services or for our business functions or activities. If you do not provide the Personal Information we request, we may be unable to provide you with our Services. We may collect the following types of Personal Information:

- (a) full name;
- (b) phone number and other contact details;
- (c) email address;
- (d) mailing or street address;
- (e) age or date of birth;
- (f) gender;
- (g) government identifiers (where required to comply with our legal obligations);
- (h) account username and password or security pin;
- (i) your IP (Internet Protocol) address;
- (j) your account and profile settings, including your call settings, do not disturb settings, social media settings and other settings as anticipated for use of the Services;
- (k) your device ID (such as serial numbers), device type, geolocation, network information, computer and connection information, statistics on page views, traffic to and from the sites (including time and date of visit), ad data and standard web log information;
- (l) payment and transaction data including details about payments from you and other details of the products you have purchased from us or that you have enquired about, including any additional information necessary to deliver those products and Services and respond to your enquiries (note that we do not directly collect and hold credit card and bank details, but these may be collected on our behalf via our third-party payment service providers);

- (m) information you provide to us through customer surveys and rewards programs; and
- (n) any other Personal Information that may be required in order to facilitate your dealings with us.

We may collect these types of Personal Information either directly from you, or from third parties. We may collect this information when you:

- (a) register on our website or online platform;
- (b) use our Services;
- (c) are referred to us from partners;
- (d) communicate with us through correspondence, chats, email, or when you share information with us from other social applications, services or websites;
- (e) interact with our sites, content and advertising; or
- (f) invest in our business or enquire as to a potential purchase in our business.

In addition, when you apply for a job or position with us, we may collect certain information from you (including your name, contact details, working history and relevant records checks) from any recruitment consultant, your previous employers and others who may be able to provide information to us to assist in our decision on whether or not to make you an offer of employment or engage you under a contract. This Privacy Policy does not apply to acts and practices in relation to employee records of our current and former employees, which are exempt from the Privacy Act.

Sensitive Information

Under the Privacy Act and other applicable law, "Sensitive Information" includes but is not limited to information or an opinion about an individual's race or ethnic origin, religious belief, or criminal record and also includes health, genetic or biometric information about an individual.

In certain circumstances, when you use our Services, we may collect Sensitive Information when you choose to tell us. Where collected, we will only use Sensitive Information for the primary purpose it was collected, with your consent or where required or authorised by law.

4. Personal Information and consent of third parties

From time to time, you may provide us, and we may collect from you, Personal Information of a third party. Where you provide the Personal Information of a third party, it is your responsibility to ensure that you have obtained their consent to provide their Personal Information to us and inform them that their details will be collected, stored, used and disclosed in accordance with our Privacy Policy. This includes informing them of the purpose of collection, how their information will be used, and their rights regarding access and correction of their information as set out in this Privacy Policy.

If you are purchasing or signing up to our Services for a minor or a person who you have legal responsibility for, as the parent or legal guardian, you must consider the privacy of the user over whom you have responsibility. You may also be responsible for providing any necessary consents on behalf of those individuals.

5. How we collect, hold, use and disclose Personal Information

We may collect, hold, use and disclose your Personal Information for the following purposes:

- (a) to enable you to access and use our website and Services;
- (b) to operate, protect, improve and optimise our website and Services, business and our users' experience, such as to perform analytics, conduct research, develop new features and for advertising and marketing;
- (c) to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;

- (d) to send you marketing and promotional messages and other information that may be of interest to you, including information sent by, or on behalf of, our business partners that we think you may find interesting;
- (e) to administer rewards, surveys, contests, or other promotional activities or events sponsored or managed by us or our business partners;
- (f) to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties; and
- (g) to consider your employment application.

We may also disclose your Personal Information to a trusted third party who also holds other information about you. This third party may combine that information in order to enable it and us to develop anonymised consumer insights so that we can better understand your preferences and interests, personalise your experience and enhance the products and services that you receive.

6. Do we use your Personal Information for direct marketing?

We and/or our carefully selected business partners may send you direct marketing communications and information about our Services. This may take the form of emails, SMS, mail or other forms of communication, in accordance with the Spam Act and the Privacy Act. You may opt out of receiving marketing materials from us by contacting us using the details set out in section 13 or by using the opt-out facilities provided (e.g. an unsubscribe link).

7. Who we disclose your Personal Information to

We may disclose Personal Information for the purposes described in this Privacy Policy to:

- (a) our employees, contractors and related entities;
- (b) specific third parties authorised by you to receive information held by us;
- (c) third party suppliers and service providers, including Optus Wholesale Pty Limited and its related bodies corporate (Optus), which operates the mobile network used to supply the Services to you (see 'Our network provider' below), software providers, and providers of cloud and analytics tools used to operate our websites and business and to provide our Services to you;
- (d) marketing or advertising providers;
- (e) credit reporting bodies and providers to assess your creditworthiness;
- (f) IT service providers, data storage, web-hosting and server providers;
- (g) professional advisors, dealers, agents, auditors, business partners, sponsors, business brokers, our insurers and insurance brokers;
- (h) our existing or potential agents, business partners or partners;
- (i) our sponsors or promoters of any competition that we conduct;
- (j) courts, tribunals, governmental agencies, regulatory authorities and law enforcement agencies, or as required, authorised or permitted by law; and
- (k) AI sub-processors such as Google Gemini and other similar LLM providers.

Our network provider

The Services are supplied to you using the mobile network operated by Optus Wholesale Pty Limited (ABN 86 092 227 551) and its related bodies corporate (Optus). By using the Services, you consent to us disclosing to Optus your full name, address, telephone number and account history, together with other information about your affairs or personal particulars and the carriage services supplied to you.

You further consent to Optus using that information to:

- facilitate the supply of carriage services to you by us or by Optus; and

- use that information for Optus's own marketing purposes, including to send you direct marketing communications about Optus's products and services.

You can opt out of receiving direct marketing communications from Optus at any time by contacting us using the details set out in section 13 below.

Disclosure of Personal Information outside Australia

We work with third parties to provide some sales, business, and customer support. We may also contract third parties to manage certain aspects of our business such as data storage, mailing, IT services, marketing, billing and auditing. Some of these third parties are located in the United States and the Asia Pacific. These third parties may have access to systems that include your Personal Information.

When you provide your Personal Information to us, you consent to the disclosure of your information outside of Australia and acknowledge that we are not required to ensure that overseas recipients handle that Personal Information in compliance with the Privacy Act. We will, however, take reasonable steps to ensure that any overseas recipient will deal with such Personal Information in a way that is consistent with the Australian Privacy Principles.

8. Using our website and cookies

We may collect Personal Information about you when you use and access our website.

While we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit and the internet protocol address assigned to your computer.

We may also use 'cookies' and other similar tracking technologies (such as Google Analytics) on our website in order to track your website usage and remember your preferences. Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions.

We may also use cookies to enable us to collect data that may include Personal Information. For example, where a cookie is linked to your account, it will be considered Personal Information under the Privacy Act. We will handle any Personal Information collected by cookies in the same way that we handle all other Personal Information as described in this Privacy Policy.

You can disable cookies through your internet browser but our websites may not work as intended for you if you do so.

9. Security

We may hold your Personal Information in either electronic or hard copy form. We take reasonable steps to protect your Personal Information from misuse, interference and loss, as well as unauthorised access, modification or disclosure and we use a number of physical, administrative, personnel and technical measures to protect your Personal Information. These measures are robust, but security risks do change. We will remain vigilant in our efforts to protect your Personal Information, however, we cannot guarantee the security of your Personal Information.

10. Links

Our website may contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, and we have no control over or rights in them. The privacy policies that apply to those websites may differ substantially from this Privacy Policy, and we encourage you to read them before using those websites.

11. Accessing or correcting your Personal Information

You can access the Personal Information we hold about you by contacting us using the contact details set out in section 13 below. Sometimes, we may not be able to provide you with access to all of your Personal Information and, where this is the case, we will tell you why. We may also need to verify your identity when you request your Personal Information.

12. Making a complaint

If you think we have breached the Privacy Act, or you wish to make a complaint about the way we have handled your Personal Information, you can contact us using the contact details set out in section 13 below. Please include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and try to investigate and respond to any complaints regarding your privacy within a reasonable time (and not longer than 30 days).

If we do not resolve your enquiry, concern or complaint to your satisfaction or you require further information in relation to any privacy matters, you can contact the relevant regulatory authority, whose contact details are below:

Office of the Australian Information Commissioner

Telephone: 1300 363 992

Email: enquiries@oaic.gov.au

Post: GPO Box 5288, Sydney NSW 2001

13. Contact us

We recognise that your Personal Information is important to you. For further information about our Privacy Policy or practices, or to access or correct your Personal Information, or make a complaint, please contact us using the details set out below:

Privacy Officer

Post: PO Box Q56, Queen Victoria Building NSW 1230

Email:

(a) for queries: compliance@spriggy.com.au

(b) for complaints: complaints@spriggy.com.au

In-app chat: by using the in-app chat function available in the Spriggy Mobile app

Phone: 1300 640 918

Operating hours: Monday to Sunday 9am to 5pm, and 10am to 4pm on NSW public holidays (AEST/AEDT)