

PRIVACY POLICY

Privacy Statement

Espavita® understands the importance of your privacy and handling of personal information and does so in accordance with the *Australian Privacy Principles (APPs)*, which forms part of the *Privacy Act 1988*, amended *12 March 2014*. This policy explains how we use personal information that we may obtain about you. By using our website you consent to this use.

Collection of Your Personal Information

Espavita® members and guests personal information is only collected when it is necessary. This is usually collected through information provided by members and guests on the consultation form, promotions, competitions and consumer enquiries made in person or on the Espavita® website. Information you provide or that is obtained by us will be used by us to enable us to review, develop and improve the services which we offer and provide you and other guests (via mail, email, telephone or otherwise) with information about new products and services and special offers we think you will find valuable. We may also inform you about new products and services and special offers of selected third parties.

This information may include:

- Your name, postal address, contact number(s) and email address
- Information about your preference for products or services
- Information on any health conditions you may have
- Your credit card details for products, services and cancellation fees
- Your Health Fund membership number (when requesting a service rebate)
- Information on the products and services we have provided to you
- Details of any prizes you may have won
- A record of any enquiries you have made
- Other information you have provided to us

Espavita® collects personal information directly from you wherever possible, however sometimes we may collect personal information about you from a third party such as from a friend, family member or colleague who has provided your details to us, so we can provide you with a gift certificate; or a person who has entered your name and email address in a competition.

This information is used for the following purposes:

- To confirm your identity
- To conduct consumer research
- To contact you directly
- To notify you of the outcome of competitions or other promotions
- Or such other purposes relating to your relationship with Espavita® (collectively the Primary Purpose)

Espavita® will not use or disclose any personal information for a purpose other than the Primary Purpose for which it was collected.

Espavita® will only collect other personal information, including sensitive information, in accordance with the Act.



We will use this information in the following way:

- To fulfill our agreement with you, including reserving your appointment, sending you a confirmation about your reservation; or contacting you should we need to discuss your reservation/appointment
- To register you with our website and administer our website services where you have registered to receive these (You can unsubscribe from these services at any time – opt-out)
- To administer any contest or other promotional offer you may enter and notify winners
- To answer any enquiries which you may send to us by e-mail
- For crime prevention and detection
- For direct marketing purposes, as set out in detail below
- To update you on any changes to our services or Terms and Conditions

If you are booking an appointment on behalf of someone else, you must obtain their consent to use their personal information. We proceed on the basis that you have obtained this consent.

Sharing Your Personal Information

Except where you are otherwise notified and you have not objected to such, Espavita® does not sell, rent or otherwise make available any personal information to third parties.

Espavita® does however outsource certain business functions to third party organisations from time to time and solely for the purpose of such organisations providing services to Espavita®. Personal information may be transferred to or handled by the following parties as required:

- To trustworthy third parties that we use for the provision of certain services, namely direct debit
- To third party organisations involved in credit card authorisation
- To third party organisations for our customer management system
- To our employees and agents to do any of the above on our behalf, now or in the future
- Promotion and advertising agencies and consumer research agencies

If you choose not to provide certain personal information we request, you will still be able to visit our website but you may be unable to access certain options or services.

Data Quality and Security

Espavita® is dedicated to keeping personal information secure and protected from misuse, loss, unauthorised access, modification, disclosure and interference. This includes physical security, computer and network security, communications security and personnel security. We will take appropriate steps to protect the personal information you share with us. We have implemented technology and security features to safeguard the privacy of your personal information.

Once Espavita® no longer requires your personal information for the primary purpose it was collected for, Espavita® takes all reasonable steps to destroy or de-identify the personal information.

Espavita® only retains your credit card or account information to secure your appointment booking for services authorised by you. After the service appointment has been completed or cancelled, your credit card information is destroyed after any cancellation fees have been deducted (if applicable) to ensure these details cannot be used in the future unless you provide us with the details again.



Cookies

Our website may use "cookies" so we can better serve you with customised information when you return to our website. Cookies are identifiers, which a website can send to your browser to facilitate your next visit to our website. You can set your browser to notify you when you are sent a cookie, giving you the option to decide whether or not to accept it.

Links

Our website may contain links to other web sites. Please be aware that we are not responsible for the privacy practices of websites not operated by us. We encourage you to read the privacy statements of each and every web site that collects personally identifiable information. This privacy statement applies solely to information collected by the Espavita® website.

Correction/Updating of Personal Information/Opt out

Espavita® takes all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete, up-to date and relevant to the primary purpose for which the information is collected for. If your personally identifiable information changes, or if you no longer desire our service, we will provide a way to correct, update or remove your personal information provided to us. If you no longer wish to receive promotional materials you may "opt out" of receiving these communications by emailing us at ultimo@espavita.com.au This will remove you from Espavita® mail lists.

Marketing

Espavita® complies with permission based direct marketing requirements under the Act and the Spam Act 2003. When collecting your personal information, we must request your permission to use that information to send you information on services, products and promotions or have our associates send you marketing material. We must also give you the opportunity to "opt out" of receiving such marketing material. Where you indicate your consent, Espavita® may enter your details into a database for the purpose of contacting you directly about the Espavita® brand, products, special offers, samples, consumer research and other promotions.

Competitions and Trade Promotions

The most common methods by which we collect your personal information is via joining our membership program and booking for services; your client card which is completed at or before your first visit, and through competitions or other trade promotions.

For the purposes of competitions and trade promotions, the following special conditions apply to the collection, use and disclosure of your personal information:

- All entries become the property of Espavita® (and any third parties conducting joint promotions with Espavita®)
- Winners' details and a description of the prizes will be entered on a database to comply with record-keeping requirements of relevant Australian State and Territory trade promotion legislation
- Your personal information may also be published in a newspaper or other media in accordance with the terms and conditions of each promotion.





Access to Your Personal Information

You have the right to access personal information we keep about you, for what purposes we hold it and how we collect, hold, use, and disclose your personal information by sending us a written request to ultimo@espavita.com.au. We may refuse to grant you access to the information if the Act permits or requires such refusal.

Transfer of Your Personal Information

Espavita® will only transfer personal data overseas in circumstances where it is permitted by the Act and the Amended Act.

Concerns and Complaints

If you have any concerns or complaints regarding the handling of your personal information by Espavita® or a breach of the APPs by Espavita®, please contact us at ultimo@espavita.com.au

Notification of Change

Further information on privacy is available at the website of the Office of the Australian Information Commissioner <http://www.oaic.gov.au> Espavita® reserves the right to change this Privacy Policy at any time and we will post those changes on our website so you are always aware of what information we collect, how we use it and under which circumstances if any, we disclose it. If at any point we decide to use personally identifiable information in a manner different from that stated at the time it was collected, we will notify you via email. You will have a choice as to whether or not we use your information in this different manner. We will use information in accordance with the Privacy Policy under which the information was collected.

