

PRIVACY POLICY

We respect your privacy

Venga Pty Ltd ACN 111 298 830 (**Chocolateria San Churro**) is committed to ensuring that personal information collected from our customers and franchisees is managed in accordance with the *Privacy Act 1988* (Cth) (**Act**), including the Australian Privacy Principles.

“Personal information” has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number and email address. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

Our Privacy Policy, as outlined below, is for Australian operated stores only and includes details about the type of personal information we collect, how this information is used and disclosure of such information.

CUSTOMERS

Through the stores and official website www.sanchurro.com, customers are given the opportunity to participate in loyalty and feedback programs. By participating in our loyalty program the customer has the option to supply personal information including name, address, phone numbers, email address, date of birth and opinions to Chocolateria San Churro. If you choose not to provide your personal information, you may not be able to participate in the loyalty and feedback programs. Information collected through the program is used for marketing and communication purposes to develop our relationships with customers and continually improve our products and customer service levels with the aim of providing an outstanding and personalised experience for our customers.

Chocolateria San Churro does not sell, rent or give away customer's personal information to other non-affiliated companies or businesses for their profit through the sale of goods or services. We do not sell and therefore do not profit from the sale of customer databases, lists and other personal information to non-affiliated business entities. The only occasion we have to share personal information with third parties is in the general maintenance of the system and the customer database for our own use and benefit.

EMPLOYEES

Personal information provided through submission of an employment application will only be used for the recruitment process. If the application is successful, the information will form part of an employee record. The Act does not apply to employee records. Unsuccessful applications will remain on file should suitable employment opportunities arise in the future and maybe returned or destroyed upon request.

FRANCHISEES

Personal information provided by potential franchisees will not be disclosed to third parties unless required in accordance with the Act. All information provided will be used to assess the suitability of the applicants becoming Chocolateria San Churro Franchisees. An applicant has the opportunity not to provide certain information requested, however this may hinder the suitability assessment. If your application is successful your personal information will form part of an ongoing franchisee record. Should your application be unsuccessful you may request to have the information collected returned to you or destroyed.

Chocolateria San Churro will take all reasonable precautions to ensure all information provided is kept confidential and remains within the Chocolateria San Churro Franchise System. Personal information will not be disclosed to any other parties without your consent unless required in accordance with the Act.

MARKETING

We may send you direct marketing communications and information about our services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the *Spam Act 2003* (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list.

We may provide your email address to other organisations for the purposes of direct marketing.

DISCLOSURE OF YOUR PERSONAL INFORMATION

We may disclose your personal information to:

- our employees, franchisees, related bodies corporate, contractors or service providers for the purposes of operation of our website or our business, fulfilling requests by you, and to otherwise provide services to you including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service

providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants;

- suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes; and
- any organisation for any authorised purpose with your express consent.

DISCLOSE OUTSIDE AUSTRALIA

We may disclose personal information to our related bodies corporate and third party suppliers and service providers located overseas for some of the purposes listed above. We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information. We may disclose your personal information to entities located outside of Australia, including the following:

- our data hosting and other IT service providers, located in the Philippines; and
- other third parties located in the United States.

SECURITY AND DATA QUALITY

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure. We may hold your information in either electronic or hard copy form. Personal information is destroyed or de-identified when no longer needed or when we are no longer required by law to retain it (whichever is the later).

ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

You have the right to access any information you may have provided to Chocolateria San Churro and update or correct such information at any time. You may do this by contacting us as noted below.

COMPLAINTS HANDLING

If you believe that your privacy has been breached, please contact us using the contact information below and provide details of the incident so that we can investigate it. We will treat your complaint confidentially, investigate your complaint and aim to ensure that we contact you and your complaint is resolved within a reasonable time (and in any event within the time required by the Act, if applicable).

POLICY MODIFICATION

Any modifications will be noted here, and effective from the date of posting, to allow you to keep up to date with how we collect and manage personal information.

CONTACT INFORMATION

Should you have any queries or concerns relating to our commitment to your privacy, please feel free to contact our support team.

Chocolateria San Churro Head Office

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Fitzroy, VIC 3065

Phone: 1300 797 620
Phone: +61 3 8415 5800