

Company Privacy Policy

Overview

The Franchise Relationships Institute (FRI) - ABN 91 927 769 093 - has handled Personal Information in relation to products, events and training for over 23 years and has been proactive and committed to developing policies and procedures to protect the privacy of all clients.

This FRI Privacy Statement seeks to:

- Ensure Personal Information is collected, stored, and used in accordance with the Privacy Act 1988 (Cth) and the Privacy Amendment Act 2012 (effective 12 March 2014).
- Acknowledge the responsibility of FRI in ensuring that client information is protected.
- Protect the privacy of clients by ensuring that only relevant Personal Information, which is necessary to provide products and services, is collected.
- Ensure that all Personal Information collected, used or disclosed is accurate, complete and up-to-date
- Obtain consent to collect sensitive information
- Take reasonable steps to make an individual aware of
- Why we are collecting information about them
- Who else we might give it to
- Other specified matters
- Destroy or permanently de-identify Personal Information if we no longer need it for any purpose for which we may use or disclose information

Purpose

FRI recognises the importance of privacy and security of personal details of all clients and their franchisees. The following Approach to Privacy indicates the minimum privacy standards for handling Personal Information, in relation to internal and external practices; and it aims to protect and provide absolute privacy and quality assurance for all clients.

Scope

This document sets out FRI's approach to comply with the guidelines issued under the Privacy Act and the Privacy Amendment Act.

The Privacy Officer will handle any privacy complaints and if no resolution is reached, the complaint will be forwarded to the Founder for further action.

Personal Information means "personal information" as defined in the Privacy Act 1988 (Cth).

This information may include details such as an individual's name, address, billing information, contact telephone number, email address or photograph.

FRI products and services means any product or service, provided to FRI clients in the normal course of FRI's business activities.

This can be an activity performed in relation to an individual that is intended or claimed (expressly or otherwise) by the person performing it to:

- Assess, record and maintain personal contact details for marketing of upcoming events and training to clients, their franchisees and outside service providers;
- Develop and continue our relationship with clients, their franchisees and outside service providers.

Breach

Discipline for Breach of the Approach to Privacy

All incidents of breach in relation to this approach to Privacy must be reported to the Privacy Officer in the first instance.

Breach of this approach to Privacy by FRI employees will result in disciplinary action, and may result in summary dismissal.

Confidentiality

Unauthorised disclosure of FRI information including the misuse of intellectual property belonging to FRI is prohibited and may result in termination of employment.

FRI's Approach to Privacy – 1. Collection

All information collected by FRI is for the purpose of providing a high quality service for all FRI clients.

1. When collecting Personal Information, FRI will take reasonable steps to inform the individual of the following:

- The identity of FRI and its contact details
- How the individual may obtain access to his or her Personal Information
- Purposes for which the Personal Information is collected
- To whom the Personal Information will be disclosed
- What the consequences may be (if any) if the individual does not provide all of their Personal Information requested

2. FRI's information collection principles state:

- Only Personal Information necessary to provide its activities is collected
- The collection of Personal Information should be conducted in a lawful and fair manner (approach taken is open and not misleading), and in a way that is not unreasonably intrusive
- If it is reasonable and practicable to do so, collect Personal Information about an individual only from that individual
- If Personal Information is collected about an individual from someone else, take reasonable steps to ensure that the individual is or has been made aware of the matters listed in 1 above

FRI does not actively collect Personal Information which is "sensitive information" (as defined in the Privacy Act 1988) but may collect "sensitive information" by consent if it is volunteered.

FRI's Approach to Privacy – 2. Use and Disclosure

The following guidelines apply for use and disclosure of information:

Purpose of Collection

- The 'primary' purpose for collection of data is always made clear.
- Consent for secondary purposes may be obtained at the same time of gathering information for the primary purpose or by future call/contact.

Direct Marketing & Follow-up

Your Personal Information may be used for secondary purposes.

- Secondary purposes include:
 - Direct marketing
 - Follow-up
 - Relationship development
 - Promotion of FRI products and services
- If the information is used for secondary purposes, both of the following apply:
 - The secondary purpose relates to the primary purpose of collection, and if the Personal Information is sensitive information, directly related to the primary purpose of collection
 - The individual would reasonably expect the organisation to use or disclose the information for the secondary purpose

or

- The individual has consented to the use or disclosure

or

- If the information is not sensitive information and the use of the information is for the secondary purpose of direct marketing to clients:
 - It is impracticable for FRI to seek the individual's consent before that particular use
 - The individual has not made a request to the organisation not to receive direct marketing communications
 - FRI's procedures and guidelines on direct marketing are complied with.

FRI's Approach to Privacy – 3. Data Quality and Security

FRI will take all reasonable steps to ensure that Personal Information is accurate, complete and up-to-date at time of use.

Data Quality Procedure

Procedures undertaken to ensure data quality include:

- Verification of Personal Information during contact
- Amendments to our records when an update is provided by clients

Information Security

FRI has implemented the following security safeguard and procedures to ensure individuals' Personal Information are restricted from;

- Misuse
- Loss
- Unauthorised access, modification or disclosure

Security of Data

FRI is committed to information security. We will use all reasonable endeavours to keep the Personal Information we collect, hold and use in a secure environment. To this end we have implemented technical, organisational and physical security measures that are designed to protect Personal Information, and to respond appropriately if it is ever breached.

When information is collected or used by **us and** is stored on third-party service providers (e.g. AWS cloud servers), **we** take reasonable steps to ensure these third-parties use industry standard security measures that meet the level of information security **we** owe our Users.

We endeavour to routinely review our security policies and procedures and consider the appropriateness of new technologies and methods.

FRI's Approach to Privacy – 4. Openness

FRI is open to any queries or suggestions regarding our Privacy Statement and approach to privacy.

If further information is requested, the individual is directed to the FRI website at www.franchiserelationships.com or to Privacy Officer, email info@franchiserelationships.com.

Access to personal information is provided by the Privacy Officer.

FRI's Approach to Privacy 5: Access and Correction

FRI understands that open communication with individuals in relation to access to Personal Information is necessary to gain trust and to build a relationship.

In relation to the FRI Approach to Privacy, giving access means that on request, and if none of the Australian Privacy Principles (APPs) exceptions apply, FRI must give an individual access to personal information, it holds about the individual that falls within the definition of "Personal Information". This includes information it has collected from third parties and information it has received unsolicited and added to its records.

According to FRI Approach to Privacy when individuals request information:

- They are not required to provide a reason
- All official requests for information must be in writing
- An identity check is undertaken
- Information is checked to ensure no information should be withheld (according to the Privacy Act)
- Where access to certain details is to be withheld, reasons for this decision will need to be provided to the individual
- Once the Personal Information is prepared and cleared for access, the information can be provided in the form most appropriate to the situation. This will take into account the wishes expressed by the individual in his or her original request.

The total time for processing a request for access to information will take no longer than 28 days from the time a request is received.

FRI's Approach to Privacy – 6. Anonymity

The provision of your Personal Information is voluntary, but if this information is not provided FRI may not be able to provide you with the products or services you request.

FRI's Approach to Privacy – 7. Trans-border Data Flows

FRI will only transfer Personal Information about an individual to someone (other than the organisation or the individual) who is in a foreign country if:

- The organisation reasonably believes that the recipient of the information is subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the information that are substantially similar to the Australian Privacy Principles; or
- The individual consents to the transfer; or
- The transfer is necessary for the performance of a contract between the individual and the organisation, or for the implementation of pre-contractual measures taken in response to the individual's request; or
- The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the individual between the organisation and a third party; or
- All of the following apply:
 - The transfer is for the benefit of the individual
 - It is impracticable to obtain the consent of the individual to that transfer
 - If it were practicable to obtain such consent, the individual would be likely to give it

The organisation has taken reasonable steps to ensure that the information, which is transferred, will not be held, used or disclosed by the recipient of the information inconsistently with the Australian Privacy Principles.

About Cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either “persistent” cookies or “session” cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

We use Cookies

We use cookies for the following purposes:

- authentication – we use cookies to identify you when you visit our website and as you navigate our website.
- status – we use cookies to help us to determine if you are logged into our website.
- personalisation – we use cookies to store information about your preferences and to personalise the website for you.

- security – we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally.
- advertising – we use cookies to help us to display advertisements that will be relevant to you.
- analysis – we use cookies to help us to analyse the use and performance of our website and services.
- cookie consent – we use cookies to store your preferences in relation to the use of cookies more generally.

Cookies used by our Service Providers

Our service providers use cookies, and those cookies may be stored on your computer when you visit our website.

We may use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

We may publish Google AdSense interest-based advertisements on our website. These are tailored by Google to reflect your interests. To determine your interests, Google will track your behaviour on our website and on other websites across the web using cookies. We may also publish Google AdSense advertisements on our website. To determine your interests, Google will track your behaviour on our website and on other websites across the web using cookies. This behaviour tracking allows Google to tailor the advertisements that you see on other websites to reflect your interests (but we do not publish interest-based advertisements on our website). You can view, delete or add interest categories associated with your browser by visiting: <https://adssettings.google.com>. You can also opt out of the AdSense partner network cookie using those settings or using the Network Advertising Initiative's multi-cookie opt-out mechanism at: <http://optout.networkadvertising.org>. However, these opt-out mechanisms themselves use cookies, and if you clear the cookies from your browser your opt-out will not be maintained. To ensure that an opt-out is maintained in respect of a particular browser, you may wish to consider using the Google browser plug-ins available at: <https://support.google.com/ads/answer/7395996>.

Managing Cookies

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. Blocking all cookies will have a negative impact upon the usability of many websites.

If you block cookies, you may not be able to use all the features on our website.

Queries

Any Privacy-related queries should be addressed to:

Privacy Officer

Franchise Relationships Institute

Email: info@franchisereationships.com