

Onboard Express Privacy Policy

Affirm Software Group Pty Ltd trading as Onboard Express ("**Onboard Express**") appreciates the importance of protecting personal information about individuals and recognises the trust placed in Onboard Express when personal information is disclosed to Onboard Express. To the extent that Onboard Express is bound by the Australian Privacy Principles ("**APPs**") contained in the Privacy Act 1988 (Cth) ("**Privacy Act**"), Onboard Express complies with the APPs when handling personal information. Onboard Express also complies with the Health Privacy Principles ("**HPPs**") contained in the Health Records Act 2001 (Vic) ("**Health Records Act**") when handling health information. In recognition of individuals' trust in Onboard Express, Onboard Express have implemented this Privacy Policy. This Privacy Policy explains how Onboard Express handles personal information (including health information).

1. Terminology

In this Privacy Policy the expression:

- "**health information**" refers to information or an opinion about the physical health of a person or disability of a person;
- "**personal information**" refers to information or an opinion (including health information and sensitive information) about a person whose identity is apparent, or can reasonably be ascertained, from the information or opinion; and
- "**sensitive information**" refers to information about a person's professional or trade membership, criminal record and health information.

2. Purposes for Collecting Information

Onboard Express only collects personal information about a person to the extent that this is necessary for one or more of the following purposes:

1. to provide Onboard Express's services including billing for the provision of the services;
2. to market, advertise or otherwise promote Onboard Express's services;
3. to improve Onboard Express's services;
4. to provide general information about Onboard Express's services;
5. to undertake market research in relation to Onboard Express's existing and potential future services;
6. to monitor use of our Onboard Express website ("**Website**"); and
7. to comply with taxation, occupational health and safety laws, and any other applicable laws.

Onboard Express only collects health information and other sensitive information about a person with their consent unless Onboard Express is otherwise permitted to collect the information under the Privacy Act or Health Records Act. If the personal information requested by Onboard Express for the provision of a service is not provided then Onboard Express may not be able to provide the requested service.

3. Types of Information Collected

The types of personal information which Onboard Express may collect and hold for the purposes outlined above include, without limitation, a person's name, address, telephone number, facsimile number, email address, credit card information, occupation, job title, vaccination status, employer's name and address, and information required to be provided to Onboard Express by a person when using Onboard Express's services.

4. Means of Collecting Information

Onboard Express may collect personal information in a variety of different ways including, without limitation: over the Internet using this Website, email or another form of electronic communication; over the telephone or facsimile; on forms, questionnaires or surveys; or person to person.

Onboard Express may collect de-identified information through the use of this Website, including the dates and times a person accesses this Website, the domains from which a person visits this Website, a person's activity on this Website and Internet Protocol addresses. This information is sometimes called "click stream data".

Onboard Express may use this data to analyse trends and statistics in order to improve this Website and Onboard Express's services. Onboard Express collects this data through the use of various technologies, including "cookies".

A cookie is a text file that this Website sends to the browser used by a person which is then stored on the person's computer as an anonymous tag that identifies that person's computer, but not the person, to Onboard Express. A person can set their browser to disable cookies. However, some parts of this Website may not function properly if cookies are disabled.

Some pages on this Website and emails created by this Website may also contain a "web beacon". A web beacon is a clear-pixel image which enables Onboard Express to monitor a person's Internet activity. When an individual views a page that contains a web beacon, a de-identified notice of the visit is generated which may be processed by Onboard Express. A web beacon usually works in conjunction with a cookie. If you disable cookies, a web beacon will be able to generate an anonymous notice of the visit but which cannot be associated with the information contained in the cookies.

5. Information Use and Disclosure

Onboard Express will not use or disclose for a secondary purpose any personal information about a person that Onboard Express collects other than the primary purpose of collection without the person's consent unless:

1. the secondary purpose is related to the primary purpose (directly related if health information or other sensitive information) and the person would reasonably expect Onboard Express to use or disclose the information for that secondary purpose; or
2. the use or disclosure is otherwise permitted under the Privacy Act or Health Records Act.

By using this Website a person will be deemed to consent to Onboard Express using and disclosing their personal information for the purposes specified above in the section "Purposes for Collecting Information".

By using this Website a person will also be deemed to consent to Onboard Express processing and storing their personal information on servers operated by Onboard Express or its service providers.

In providing services Onboard Express may disclose personal information about a person to Onboard Express's client with whom the person has entered into or intends to enter into a contract, the person's agents and representatives, Onboard Express's service providers assisting in the provision of Onboard Express's services (including, without limitation, Onboard Express's faxing service provider and credit card processing service provider) and the providers of third party services which are advertised or accessible through this Website (including, without limitation, Flare HR Pty Ltd, Simple Financial Choices Pty Ltd and WorkPro).

6. Employee Information

This Privacy Policy does not apply to Onboard Express's acts and practices involving an employee record held by Onboard Express and directly related to a current or former employment relationship between Onboard Express and the employee concerned other than an employee record containing health information.

7. Data Security

Onboard Express will take reasonable steps to protect the personal information which Onboard Express holds from misuse, interference and loss and from unauthorised access, modification or disclosure. Where considered appropriate by Onboard Express, Onboard Express will use encryption when storing personal information, implement account auditing and access control procedures and comply with relevant industry standards for the protection of personal information.

When using this Website a person should be aware that no data transmission over the Internet can be guaranteed to be totally secure. Although Onboard Express strives to protect such information including, without limitation, through the use of strong data encryption where considered appropriate by Onboard Express, Onboard Express does not warrant the security of any information transmitted over the Internet

By using this Website a person accepts that their information will be transmitted to and from this Website at their own risk.

8. Privacy Policy Changes

Onboard Express may change this Privacy Policy from time to time. Any changes to this Privacy Policy will be published on this Website.

A person may obtain a copy of Onboard Express's current Privacy Policy from this Website or by contacting Onboard Express's Privacy Officer using the contact details below.

9. Access, Correction and Further Information

Onboard Express will provide a person with access to their personal information which is held by it unless Onboard Express is permitted under the Privacy Act or Health Records Act to refuse to provide such access.

Onboard Express will take reasonable steps to correct personal information held by Onboard Express that is not accurate, complete and up to date or that is irrelevant or misleading.

A person may contact Onboard Express's Privacy Officer using the contact details below if they require:

1. access to any of their personal information held by Onboard Express (where they cannot obtain such access using this Website);
2. correction of any of their personal information held by Onboard Express that they consider is not accurate, complete and up to date or is irrelevant or misleading (where they cannot make such correction through this Website); or
3. further details or a complaint dealt with about the way that Onboard Express handles personal information.

10. Privacy Officer's Contact Details

Onboard Express's Privacy Officer may be contacted by email at info@affirmsoftware.com.au by telephone on +61 3 9029 2907, or by mail to:

Privacy Officer

Onboard Express

Suite 4.15

343 Little Collins Street

MELBOURNE VICTORIA AUSTRALIA 3000

This Privacy Policy is effective as of 24 November 2021.