



## **DIVVY Privacy Policy**

### **1. Introduction**

We are Divvy Parking Pty Ltd and we operate the “Divvy Parking Service” via the website located at [www.divvy.com.au](http://www.divvy.com.au) (the “Site”).

This privacy policy explains what information We collect about you, how We may use it and the steps We take to ensure that it kept secure.

We will not use or share your information with anyone except as described in this Privacy Policy.

### **2. Information Collected**

We collect certain information from you if you register for an Account or use our Service, such as your email address, name, address, and a password.

If you choose not to provide certain information, you will not be able to utilise the full extent of the Divvy Parking Service.

We also retain information you post to the Site.

We also retain correspondence between you and Us. We also retain messages you send through the Divvy Parking Service.

### **2.3 Payment Information**

We collect payment information and information about your accounts with financial institutions.

Bank account details are stored in an encrypted format to prevent data from being accessed by unauthorised users.

We do not store credit card or other financial account information entered via the Site. This data is transferred from the website to a secure data vault. Once the transfer is complete or has failed the data is removed from the Site.

We use eWAY to ensure high levels of security on all credit card payments. For more information in relation to eWAY’s Privacy Policy visit [www.eway.com.au](http://www.eway.com.au)

### **2.4 Parker's Information**

We may check the registration details of all vehicle which are intended to be used for the Divvy Parking Service to ensure that they are currently registered and accurately described on the Site.

Registration plate details will be passed onto the person listing their car park and or building manager to allow them to identify you.

We may also request you provide licence details, to ensure your licence accurate.

By registering with us, you consent to Us to confirming you details with the Roads and Traffic Authority or other organisations.

## **2.6 Cookies**

We use cookies to record how the Divvy Parking Service is being used in order to improve it.

We send cookies to your computer and/or smart phone that contains an identification number unique to the device you are using.

A cookie conveys information about how you browse and use the Divvy Parking Service.

You are able to disable cookies via your web browser. However, some features of the Divvy Parking Service may not function properly if the ability to accept cookies is disabled.

## **2.7 IP Address and Logins**

We log each visit to each web page on the Site. A log entry can contain information typically found in the "header" of your web browser's request such as the browser type you use, your Internet Protocol address, and the date and time of day.

We also log your cookie's identification number and the URL of the last site you visited. This log information is important for security, audit, quality improvement, as well as for monitoring the status of the Divvy Parking Service.

## **2.8 Clear GIFs**

When you use the Divvy Parking Service, Divvy may employ clear gifs (also known as web beacons) which are used to track the online usage patterns of our users anonymously and improve the effectiveness of our marketing. No personal information from your Account is collected using these clear gifs.

In addition, We also use clear gifs in emails sent to our users to track which emails are opened by recipients.

## **2.9 Data Gathered**

Our mobile application allows Us to gather information about your vehicle use, including time of use, location, and other aspects of your vehicle use.

We use this information to provide you with the Divvy Parking Service, aggregate your use habits and provide you with related benefits such as commuting solutions or other perks for safe driving.

We also aggregate your data with other parkers' data to better understand how people use the Divvy Parking Service and how we can make improvements.

## **2.10 Location**

We store personal information in locations outside the direct control of Divvy (for instance, on servers or databases co-located with hosting providers).

## **2.12 Update and Removal**

You may update your account information.

You may request Us to remove all information about you from our database by using the Account deactivation features available via the Site.

However, you cannot delete information associated with past transactions on the Site or by use of the Divvy Parking Service.

Additionally, copies of data may temporarily retain information about users as a regular course of Divvy's data protection and recovery practices.

## **3. Information Use**

### **3.1 General Uses**

Divvy uses your information for the following purposes:

- to provide the Divvy Parking Service to users;
- to create, improve or edit content on the Site;
- for marketing and advertising in which Divvy engages;
- to share with Divvy's affiliates, agents, and representatives for any of these purposes; and

### **3.2 Use of Contact Information**

We will send you any notices related to the Divvy Parking Service by email. This will include any legal notices We need to send you.

We will also send you notifications from other Users, updates about changes and features of the Divvy Parking Service, and important news that may impact your use of the Divvy Parking Service

You can turn these notifications off or modify how often and in what form you receive them, in accordance with the options available on the Site.

### **3.3 Account Termination or Deactivation**

Following termination or deactivation of your Account, we retain your information for a reasonable time for backup, archival, or audit purposes, or to maintain and improve the Divvy Parking Service.

## **4. Information Disclosure**

Divvy discloses the information you provide for a variety of purposes.

### **4.1 Third Parties**

Any information you make available to the Site or Service may be available, via the Site or Service, to the public, as regulated by any applicable privacy mechanisms.

Divvy will never rent or sell your information to others.

### **4.2 Purposes Connected to the Divvy Parking Service**

We may share your information with other users of the Divvy Parking Service.

If you park in a space made available via the Divvy Parking Service, We will share your phone number with the person who listed the parking space, so that they can communicate directly with you if there is an urgent need to do so.

If you share your parking space via the Divvy Parking Service, the information for that parking space, which may include the car space address, will be made available to others using our service.

Divvy will also share your rating history.

We collect aggregate data, including how many;

- transactions you have performed,
- complaints have been received regarding your parking or your parking space, and
- tickets, towing or other issues have been associated with your parking space or vehicle.

We may display this in a way that allows other users to help them determine if they want to interact with you.

### **4.3 Additional Services**

With your consent, we also use your information to

- provide you with additional services related to the Divvy Parking Service, such as peer-to-peer commuter solutions;
- enable you to participate in rewards programs, contests, discount offers, or other programs that involve third parties,

You will be asked to give your consent when you sign up or express interest in a product or service offered by a third party through Divvy or sponsored on our site,

In these cases, We will only share the information reasonably needed to provide you with information about those rewards programs, contests, discount offers or other programs.

## **4.4 Sale of Business**

As Divvy develops its business, Divvy may buy or sell other businesses. If We do this we will also transfer personal information that We hold about you

## **4.5 Miscellaneous Sharing**

We share anonymous usage data, referring/exit pages and URLs, platform types, number of clicks, etc.) with third parties to help them understand the usage patterns for certain Divvy services.

We allow third party ad networks to advertise on the Divvy Parking Service. These ad networks use technology to send the advertisements and links that appear on Divvy.

They automatically receive your IP address when this happens.

We do not provide any personal information to these ad servers or ad networks without your consent.

This Privacy Policy does not apply to third party advertisers. Please consult the respective privacy policies of such advertisers for more information.

## **5. Information Security**

Divvy uses industry standard security measures in place to prevent the loss, misuse, and alteration of the information that We obtain from you.

### **5.1 Encryption**

Unfortunately, nothing is 100% secure. However, we take a range of steps to protect your information including using SSL technology to encrypt sensitive data transfer.

### **5.2 Account Login**

To protect your information, We take reasonable steps (such as requesting a unique password) to verify your identity before granting you access to your Account.

### **5.3 Compromise of Personal Information**

In the event that your personal information is compromised We will notify you as soon as practicable

### **5.4 Information Control**

You can change your Account details, information you make available to the Site and Service, and Account preferences at any time by logging onto your Account.

You can request and review information that Divvy holds about you, and request changes to correct inaccuracies. Divvy will make the requested changes within a reasonable time.

### **5.5 Children's Privacy**

We do not collect or save any information from children 13 years of age and younger.

If you believe that We might have any information from or about a child under 13, please contact Us at [hello@divvy.com.au](mailto:hello@divvy.com.au)

### **5.7 Anti-Phishing**

Identity theft and phishing are of great concern to us. Safeguarding information to help protect you from identity theft is a top priority.

We will not and will not, at any time, request your credit card or financial account information, your account ID, password, or national identification numbers in a non-secure or unsolicited e-mail or telephone communication.

### **5.8 Public Forums**

The Site includes interactive forums such as message boards and chat rooms. Please remember that any information that is disclosed in these areas becomes public information and you should exercise caution when deciding to disclose your personal information.

### **5.9 Facebook Connect**

The Site or Service may allow users to access Facebook Connect

By using this Service you are allowing the Divvy to access your information.

You can edit privacy settings for the information that appears on Facebook or disconnect this service by visiting the Facebook Application Settings page or by disabling the integration from our Site.

## **6. Changes to this Policy**

If Divvy changes any terms set out in this Privacy Policy, Divvy will post those changes on the Site or Service to keep you aware of those changes.

## **7. Contacting Us**

If you wish to contact Us regarding questions or complaints relating to how We collect, store, use, manage or disclose your personal information, We ask that you contact Us at [hello@divvy.com.au](mailto:hello@divvy.com.au) and mark your email "For attention of Privacy Officer".