

Privacy Policy

In this Privacy Policy the terms 'us' 'we' or 'our' means 'Istituto Italiano di Cultura'.

We are committed to respecting your privacy, and conducting our business in accordance with all relevant laws including, the *Privacy Act 1988* (Cth) (the Privacy Act), as well as other privacy laws applicable to us.

This Privacy Policy sets out how we collect, use, hold, store and disclose your personal information.

By providing personal information to us, visiting our website, applying for a job with us, applying for, or using any of our products or entering into any of our customer surveys, rewards, membership or loyalty programs or competitions, you consent to our collection, use, holding, storage and disclosure of your personal information in accordance with this Privacy Policy and any other arrangements that apply between us and you. We may change our Privacy Policy from time to time as our business needs change or as required by law. We encourage you to review our website, or request a copy, to ensure that you are aware of our current Privacy Policy. This privacy policy should be read in line with our website's Terms and Conditions.

Personal information includes information or an opinion about an individual that is reasonably identifiable. For example, this may include your name, age, gender, postcode and contact details. It may also include financial information, including your credit card information.

What personal information do we collect?

1. The types of personal information that we collect about you may include, but are not limited to:
 - a. your name, sex, age, date of birth, mailing or street address, contact details, telephone number, email address, answers to security questions, credit card information and purchasing habits and preferences;
 - b. information collected when you visit or log-in to our website or other online services, including but not limited to, mobile apps, social media platforms, email and other online communications platforms and databases (Online Services), or when you register with us in relation to any of our products and services, and which may include (but is not limited to) your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;
 - c. the content of searches, lists or forms you submit to us requesting us to provide products, services or information;
 - d. information submitted where you participate in a survey, rewards, membership or loyalty program or competition;
 - e. transaction information about your interactions with us and your interactions with retailers and service providers;
 - f. details of the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries;
 - g. any additional information relating to you that you provide to us;
 - h. information you provide to us through, customer surveys rewards, membership or loyalty program or

competitions; or

- i. any other personal information that may be required in order to facilitate your dealings with us.
2. We may collect, store, hold, use and disclose sensitive information about you where such information is reasonably necessary for one or more of our functions or activities including providing you with products and services.
 3. Where you provide us with personal information about another person we may hold, use, store and disclose this information and you must have their consent to provide their personal information to us based on this Privacy Policy.
 4. We may collect these types of personal information either directly from you, or from third parties. We may collect this information when you:
 - a. open an account or membership with us;
 - b. contact us;
 - c. participate in a customer survey, rewards, membership or loyalty program or competition;
 - d. undertake transactions with us;
 - e. visit or register on our website;
 - f. interact with our sites, services, content and advertising, our partners and service providers and market research firms and credit providers
 - g. are one of our suppliers, contractors, dealers, related companies and agents, or are employed by one of our suppliers, contractors, dealers, related companies and agents; or
 - h. invest in our business or enquire as to a potential purchase in our business.
 5. In addition, if you apply for a job or position with us we may collect certain information from you (including your name, contact details, working history and relevant records checks) from any recruitment consultant, your previous employers and others who may be able to provide information to us to assist in our decision on whether or not to make you an offer of employment or engage you under a contract. This Privacy Policy does not apply to acts and practices in relation to employee records of our current and former employees, which are exempt from the Privacy Act.
- ## Why do we collect, use and disclose personal information?
6. We may collect, store, hold, use and disclose your personal information for the following purposes:
 - a. to enable you to purchase our products and services or use our website;
 - b. to operate, develop, protect, improve and optimise our products and services, our website, and our business, including performing analytics, conducting research and for advertising and marketing;
 - c. to provide you with products and services;
 - d. to provide support and administration, including verifying your identity;
 - e. to contact you about our products and services used by you and other arrangements, surveys, rewards, membership or loyalty programs, processing payments, training our staff, testing our systems, security, and managing your interaction with third parties including our suppliers, providers and agents and sending messages,

- reminders, technical notices, and information requested by you;
 - f. to conduct marketing activities and research for our products and services, or products and services of third parties;
 - g. to understand your interests and behaviour relevant to use of our products and services so that we can provide you with more effective communications and services;
 - h. to remember you and to personalise our Online Services and communications and provide content that matches your interests and preferences or to otherwise customise your experience of our Online Services.
 - i. to operate any rewards, membership or loyalty programs, including sales tracking, the administration of rewards and offers and account management;
 - j. where we suspect that fraud or other unlawful activity has been, is being or may be engaged in;
 - k. where a third party acquires or is seeking to acquire, or makes enquiries in relation to the acquisition of a direct or indirect interest in Nstituto Italiano di Cultura or an asset of Nstituto Italiano di Cultura;
 - l. to comply with our legal obligations;
 - m. a permitted general situation as defined in the Privacy Act; and
 - n. to consider your employment application.
7. There are laws which may require us to collect information about you.
8. If you do not provide us with information that we require, we may not be able to provide you with products or services requested by you.

Direct Marketing

9. We may also provide marketing communications and targeted advertising to you on an ongoing basis by telephone, electronic messages (e.g. email), online (including websites and mobile applications) and other means, unless you opt out or we are subject to legal restrictions including the Spam Act 2003 and the Do Not Call Register Act 2006. These communications may relate to third parties (including service providers that provide services or products to us from time to time). You can opt out by unsubscribing from these communications by clicking the "unsubscribe" link at the bottom of any email. There is no fee to unsubscribe. Otherwise, you may contact us via email or phone to request to opt out of such communications.

To whom do we disclose your personal information?

10. We may disclose personal information for the purposes described in this privacy policy to:
- a. our employees, contractors and related entities and bodies corporate;
 - b. to third party websites, apps, or other services that you can connect to via our Online Services;
 - c. third party suppliers and providers (including our service providers for the operation of our websites and our business or in connection with providing our products and services to you);
 - d. professional advisers, dealers and agents;
 - e. payment systems operators (e.g. merchants receiving card payments);
 - f. our existing or potential agents, licensees, franchisees, business partners or partners;

- g. anyone to whom our assets or businesses (or any part of them) are transferred or proposed to be transferred;
- h. specific third parties authorised by you to receive information held by us; and
- i. other persons, including government agencies, regulatory bodies and law enforcement agencies or as required, authorised or permitted by law, including where we reasonably believe that disclosure is necessary to prevent or lessen a serious threat to your health, safety or your life, or the health, safety or life of someone else;

11. We may also disclose information that has been de-identified or aggregated so that it does not personally identify you to third parties and affiliates who may use it for other purposes including to analyse trends and improve products and services.

Security

12. We may hold your personal information in either electronic or hard copy form. We take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure and we use a number of physical, administrative, personnel and technical measures to protect your personal information. However, we cannot guarantee the security of your personal information. We may use third party information system providers who may store or have access to your personal information. We may also merge personal information we receive about you with other information we hold about you. This includes information received from our partners or third parties.

Disclosure of Information Overseas

13. In the course of providing our services, we may disclose your personal information to related entities, bodies corporate and companies and third parties located overseas who assist us in providing our products and services and associated services, and law enforcement agencies, regulatory authorities and governments. These parties may be located in any country from which our products and services are sourced or sent.
14. We may also disclose your personal information to data processors and customer service providers located overseas and your personal information may also be stored overseas. Some of the disclosures of personal information to third parties described in this Privacy Policy may be to Italy, Australia, United States, United Kingdom, Canada Singapore or Indonesia. Where you consent to this Privacy Policy, you understand and agree that while the third parties will often be subject to confidentiality or privacy obligations, we will not be liable or accountable for the third party under the Privacy Act 1988 (including, without limitation, Australian Privacy Principle 8.1) or otherwise and you may not have recourse under the Privacy Act 1988 or any other law in Australia or in the overseas jurisdiction.

Links

15. Our website may contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, so we encourage individuals to read them before using those websites. We may also include advertising from our retailers, partners or third parties on the Online Services. If you click on the advertisements and exit an Online Service, this Privacy Policy will no longer apply. After exiting an Online Service, use of your personal information will be governed by the privacy policy of the

advertiser.

Istituto Italiano di Cultura

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Cookies

16. The Online Services may use "cookies" which store some information on devices accessing those Online Services. We may use cookies for a number of reasons including, without limitation, to store information about browser usage, maintain security, remember a computer which has previously visited our Online Services and to customise our Online Services according to your prior preferences and interests. Most Internet browsers, allow users to erase or block cookies from their device, or receive a warning before a cookie is stored. However, some parts of our Online Services may not function properly or completely for users that disallow cookies.
17. In some cases third parties may use cookies and other technologies such as web beacons and JavaScript in connection with online services like banner advertising, online analytics and surveys. This may allow them to collect information about your use of our Online Services (including your computer's IP address) which they may store in the United States or other countries. Those third parties may also send the information they collect to other parties if required to do so by law, or where third parties process the information on their behalf. The services or technologies we may use include (but are not limited to) Google Analytics, Google AdSense, DoubleClick, Yahoo, Adobe and Microsoft. You can find more details in the privacy policies for those services, including information on how to opt-out of certain aspects of these services.

Accessing or correcting your personal information

18. You can access the personal information we hold about you if you contact us. Sometimes, we may not be able to provide you with access to all of your personal information and, where this is the case, we will tell you why. We may also need to verify your identity when you request your personal information. If you think that any personal information we hold about you is inaccurate, please contact us and we will take reasonable steps to ensure that it is corrected.

Changes to our privacy policy

19. We reserve the right to update our Privacy Policy to reflect changes in our business practices. We may modify or update our Privacy Policy by publishing the modified or updated version on our website. We encourage you to check our website periodically to ensure that you are aware of our current Privacy Policy.

Making a complaint

20. If you think we have breached the Privacy Act or another applicable act, or you wish to make a complaint about the way we have handled your personal information, you can contact us. Please include your name, email address and telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint within a reasonable period of time. If you think that we have failed to resolve the complaint satisfactorily, we will provide you with information about the further steps you can take.

Contact us

21. For further information about our Privacy Policy or practices, to access or correct your personal information, or make a complaint, please contact us.