

R.B. FLINDERS

Mobile Application Privacy Policy

BAI GAMES PTY LTD (T/A “WENHU”)

WenHu User Privacy Policy (Privacy Policy)

Last modified: 14 December 2016

Thanks for using WenHu! Our User Privacy Policy describes how we manage personal information.

1. Privacy Policy – Scope and Consent

WenHu is an Application of BAI Games Pty Ltd trading as WenHu (referred to as ‘we’, ‘our’ and ‘us’ in this Privacy Policy). By using our Application or Website services or tools (collectively **Services**), you agree to the terms of this Privacy Policy and our User Agreement and you consent to our collection, use, disclosure, retention and protection of your personal information as described in this Privacy Policy.

Your privacy is very important to us. For that reason, please read the following details carefully and contact us, if you have any questions: info@baigames.xyz

WenHu respects your right to privacy and is committed to protecting your personal information. We comply with the Australian Privacy Principles (**APPs**) contained in the *Privacy Act 1988* (Cth) (the **Act**) as amended to the highest standard (subject to exemptions that apply to us under that Act).

This Privacy Policy governs the collection, use, disclosure, retention and storage of all personal information you may supply to us through use of our Services. This could be through you identifying yourself when requesting information to be sent to you, or when you download and use WenHu or when you complete any personal information asked of you, and through cookies and similar technologies.

2. Personal Information

When used in this Privacy Policy, the term “personal information” has the meaning given to it in the Act. In general terms, if the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

2.1. Collection

The majority of information collected, processed and retained by WenHu is sourced from personal information provided via the WenHu Application or WenHu website (www.wenhu.com.au) or provided in person to employees, contractors, agents or representatives of WenHu or through your use of our Services. Additional personal information is sourced from public databases and publicly available information.

We collect your personal information to ensure that we provide you with the level of service you deserve. The type of information we will collect about you includes but may not be limited to:

- a) Your name;
- b) Mailing or street address;
- c) Email Address and / or other social media address;
- d) Photographs;
- e) Internet Protocol (IP), Unique Device Identifiers (UDIDs) and other unique identifiers in specific circumstances, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data and standard web log information;
- f) Age or date of birth;
- g) Credit card information / payment details; and
- h) Any additional information relating to you that you provide to us directly through our website or Application or online presence or through other websites or accounts from which you permit us to collect information;
- i) Information you provide to us through customer surveys; or
- j) Any other personal information that may be required in order to facilitate your dealings with us.

We may also use cookies and various technologies to collect information which tells us about visitors to and Users of the WenHu Application. For example, we may collect information about the date, time and duration of visits and which pages of the WenHu Application are most commonly accessed or any such other information as is deemed reasonable.

2.2. Purpose

WenHu collects, holds, uses and discloses personal information about you for the following purposes:

- a) To enable you to access and use our Services;
- b) Provide and improve our services by providing a personalised experience and identifying items on WenHu that you may like or dislike;
- c) Provide you with customer service;
- d) Provide you with personalised advertising and marketing of items listed on WenHu;
- e) To communicate with you and provide you with news, information, promotions, event sponsorship or competitions relating to our existing and new services and your account;
- f) For any other purpose that you would reasonably expect WenHu to use or disclose your personal information in the process of executing that purpose;
- g) For any other purpose specified to you at the time that the personal information was collected;
- h) To investigate any complaints about or made by you, or if we have reason to suspect that you are in breach of any of our User Agreement or that you are or have been otherwise engaged in any unlawful activities; and/or
- i) As required or permitted by any law (including the Act).

We may use your information for current or future marketing and promotional purposes. By giving us your personal information, you are consenting to us contacting you via these methods. Each communication we send to you will provide details on how to unsubscribe.

If WenHu has collected and held personal information and no longer needs that information for any purpose whatsoever, we will ensure that reasonable steps in the circumstances will be taken to destroy the information or to ensure that the personal information is permanently de-identified.

2.3. Retention

We retain your personal information for as long as we deem it necessary and relevant to our operations. In addition, we may retain personal information from closed accounts to comply with national laws, prevent fraud, collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigation, enforce our User Agreement and take other actions permitted or required by applicable national laws.

2.4. Disclosure

We may disclose your personal information to:

- a) our employees, related bodies corporate, contractors or external service providers for the provision of our Services to you, the operation of our Application or our business, fulfilling requests by you, and otherwise providing products and services to you, including without limitation, IT systems administrators and our professional advisers such as accountants, solicitors, business advisors and consultants;
- b) specific third parties authorised by you to receive personal information held by us;
- c) to enforce our User Agreement;
- d) to facilitate our marketing and advertising activities;
- e) the police, any relevant authority or enforcement body, or your Internet Service Provider or network administrator, for example, if we have reason to suspect that you have committed a breach of the User Agreement, or you have otherwise been engaged in any unlawful activity, and we reasonably believe that disclosure is necessary;
- f) as required or permitted by any law (including the Act).

Unless required by law, we will not use or disclose any personal information about you to an unrelated third party without your consent. We will endeavour to take all reasonable steps to keep any information secure, accurate and up-to-date.

2.5. Choice

You have the right to decide how we use your personal information to communicate with you, send marketing material to you, provide you with personalised advertising and whether or not you wish to stay signed in to your account.

2.6. Anonymity

Under Principle 2 of the APPs, all individuals have the option to deal with WenHu through anonymity, or through the use of a pseudonym.

The option is revoked in situations where it is impracticable for WenHu to deal with individuals who have not identified themselves or who have used a pseudonym. If you do not provide us with certain Personal Information, you may be unable to enjoy the full functionality of the WenHu Application.

3. Access and Correction

Principles 12 and 13 of the APPs allows you to get access to, and correct, the personal information we hold about you in certain circumstances. If you would like to obtain such access, please either contact us on the details set out above or log in to your account and update the relevant information.

4. Security

We take all reasonable steps in our efforts to protect and secure your personal information. All personal information is stored on secured servers, reducing the risks of misuse, interference and loss. All personal information is protected against unauthorised access, modification or disclosure through only allowing access to this information by formally authorised personnel.

Although WenHu takes all reasonable steps to ensure security of personal information, including encryption of passwords, WenHu cannot guarantee the security of your Personal Information due to the unavoidable and inherent risks involved in the electronic storage and transmission of this information. WenHu will not be held responsible for events arising from unauthorised access to your Personal Information. We advise that you must take this into consideration when providing personal information.

If you suspect any misuse or loss of, or unauthorised access to your personal information, please let us know immediately.

5. Changes to this Privacy Policy

This statement represents our policy as at 12 December 2016. We reserve the right to change this Privacy Policy from time to time at our discretion, especially in line with changes in applicable regulations and legislation.

You will be informed of any changes to this Privacy Policy. This Privacy Policy is in addition to the WenHu User Agreement [Terms and Conditions www.wenhu.com.au].

6. Links

WenHu may contain links to other websites operated by third parties. We do not make any representations or warranties about third party websites that may be linked to or accessed from the WenHu Application. Third party websites are responsible for information about their own privacy practices.

7. Transfer out of Australia

We may disclose your personal information to our related bodies corporate and external 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 APPs in relation to that information.

8. Complaints

You can contact WenHu and speak with our Privacy Officer. You can contact us by emailing your complaint to: info@baigames.xyz

If WenHu is unable to resolve your complaint to your satisfaction, you are welcome to refer your complaint to the Privacy Commissioner in your State capital. The Privacy Commissioner's contact details are:

The Office of the Federal Privacy Commissioner

GPO Box 5218

Sydney NSW 2001

Fax: +61 2 9284 9666

9. Further Information

If you would like to obtain further information about privacy issues in Australia, please visit the Office of the Australian Information Commissioner <http://www.oaic.gov.au/> website.

We welcome your comments and feedback at info@baigames.xyz.