



## **PRIVACY POLICY**

Your use of this Website constitutes a consent to Francom Group's Privacy Policy. Francom Group's Privacy Policy is to be read in conjunction with Francom Group's Terms and Conditions. If you do not consent to Francom Group's Privacy Policy, Terms and Conditions then please do not use browse or access this Website.

For the avoidance of any doubt, Francom Group is comprised of the following entities: Francom Group, Francom Legal, Francom Human Resources, Francom Finance, Francom Consulting, DebtCo Pty Ltd T/AS Francom Credit Solutions, Francom Marketing, Esquire Events, Munkbury Pty Ltd and O'Connor Trading Pty Ltd ("**Francom Group**").

Francom Group ("**us**", "**we**", or "**our**") operates the website <http://www.studiofig.com.au/> ("**Service**"). Francom Group use your data to provide and improve the Service. This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data.

### **1. General**

Francom Group uses Non-Personal Information for the following general purpose: to customise the advertising and content you see, improve our services, conduct research, and provide anonymous reporting for internal and external clients.

### **2. Collection of Personal Information**

For the purpose of our Website and this Privacy Policy, Francom Group and of its related entities are a Data Controller of your personal data. A Data Controller is a natural or legal person who either alone or jointly or in common with other persons, determines the purpose for which and the manner in which any personal information is, or is to be, processed. Francom Group may use the services of various Service Providers (or Date Processors) in order to process your data more effectively. A Data Processor (or Service Provider) is a natural or legal person who processes the date on behalf of the Data Controller.

When accessing our Website, certain information submitted by you may be retained by us. Submission of information will be transmitted to us via email, which in turn may be collected by a third-party. In addition, some of your contact details may be stored in a database online. The nature of personal information collected and stored by Francom Group is dependent on the types of services utilised and the personal information provided by you.

Personal information which you provide may include, but is not limited to, your name, contact details, financial information and other personal information when using our Website. Personal information may be given by you in a variety of circumstances including, but not limited to, circumstances where you request information from Francom Group or when you make contact with Francom Group. Further, if you're an existing client, we will be able to view your personal information through our software application and hardware utilised by you as part of your account with us.

### **3. Use of Your Personal Information**

Upon providing us with information, we may use this information to contact you via email, phone, SMS or social media so as to provide you with promotional offers. We may use your personal data to contact

you with newsletters, marketing or promotional materials and other information that may be of interest to you. This information will be provided to you by Francom Group upon you requesting this information from us. The information is requested by you when you tick the opt-in box or by implying to us that you consent to us sending you the information by the method in which you supply us with the information or by the type of request made to us by you.

We may also collect information on how the Service is accessed and used ("**Usage Data**"). This Usage Data may include information such as your computer's Internet Protocol address (for example, IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

Francom Group reserve the right to use and store information about your location if you give us permission to do so ("**Location Data**"). Francom Group use Location Data to provide features of the Service, to improve and customise the Service. You may choose to enable or disable location services when you use our Service at any time, through your own device settings.

#### **4. Opt-out**

We will provide you the opportunity to 'opt-out' of having your personally identifiable information used for receiving promotional offers, when we ask for this information. You may also "opt-out" of receiving our promotional offers by clicking the unsubscribe link or following the instructions included in each communication by us or by contacting us.

You will be notified when your personally identifiable information is collected by any third-party that is not our agent/service provider, so that you can make an informed choice as to whether or not to share your information with that third-party.

#### **5. Tracking & Cookies Date**

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information. Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyse our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

#### **6. Access to Personal Information**

You may request to update, delete or access your personal information by contacting our privacy officer. You may be required to verify your identity, or we may require you to provide us with additional information about your request. Should we be permitted by law, we may refuse your request. Should we refuse a request, we will provide you with our reasons for doing so.

In the event you seek to update the personal information being held by us and there is a dispute regarding any of the personal information, we will make a note of the particulars of the dispute on the personal information provided by you to us. In the event that you have created an account with Francom Group using our Website, you are able to login to your account and view and/or update the personal information provided to us by you.

Should you make a request for us to delete your personal information, please be advised that we may not be obliged to do so or be able to do so, especially in circumstances where your file holds personal information about other customers/clients of Francom Group.

Francom Group reserves its right to charge you a reasonable administrative fee when considering your request.

#### **7. Information Sharing and Disclosure**

Francom Group do not rent, trade, or share Personal Information with third parties except to provide products or services you have requested, or when we have your permission, or under the following circumstances:

- We use other third parties such as a credit card processing company to bill you for goods sold on our Website, and an email service provider to send out emails on our behalf. When you sign up for our email list, we will share the necessary amount of personally identifiable information as necessary for the third-party to provide that service, including your name, address, credit card information and email address.
- We provide Non-Personal Information to interested third parties for the purpose of understanding the usage patterns for certain content, services, advertisements, promotions, and/or functionality of the Website.
- To any entity, court or government body where we are obliged under law to disclose such information.
- To any person or entity which at the time of providing us with the personal information we have disclosed to you that we will provide that information to the named person or entity.

We may also seek to obtain personal or other information from some or all of the above so as to allow us to provide our Services to you. We obtain this personal and other information from third parties under the assumption that you have made that third-party aware of the intended purposes of us collecting, using and disclosing the personal or other information and that the third-party has been made aware of your referral to us of them. It will be your responsibility to ensure that you have made the above disclosure to the relevant third-party.

Keep in mind that any personal information, or comment that you voluntarily disclose on the Website, for example on comment pages, or on the blog forums, become publicly available. Your account name is displayed to other Users when you send and/or post messages through the Website. Please note that any comment or other content you post or send to the Website becomes published content and is not considered personally identifiable information subject to this Privacy Policy.

## 8. Website Visit Information

Visiting our Website requires the collection of general and personal information. The collection of such information may be executed by our third-party contractors which collect information regarding your visit to our Website and includes the pages you accessed, the information downloaded, the date and time of your visit and your server address. Such information is collected for statistical purposes and assists us in keeping up the quality of our Website and its convenience for our users

## 9. Service Providers

Francom Group may employ third party companies and individuals to facilitate our Service ("**Service Providers**"), to provide the Service on our behalf, to perform Service-related services or to assist us in analysing how our Service is used by you.

These third parties have access to your personal data to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose. In any event, Francom Group do not accept any responsibility or liability if a Service Provider uses your Personal Data for any other purpose.

Francom Group reserve the right to use Google Analytics. Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualise and personalise the ads of its own advertising network. You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>.

## 10. Behavioural Remarketing

Francom Group reserves the right to use behavioural remarketing services to advertise on third party websites to you after you visited our Service. We and our third-party vendors use cookies to inform, optimise and serve ads based on your past visits to our Service.

Francom Group reserves the right to use Google AdWords. Google AdWords is a remarketing service provided by Google Inc. You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the Google Ads Settings page: <http://www.google.com/settings/ads>. Google also recommends installing the Google Analytics Opt-out Browser Add-on - <https://tools.google.com/dlpage/gaoptout> - for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>.

Francom Group reserves the right to use Twitter. Twitter is a remarketing service provided by Twitter Inc. You can opt-out from Twitter's interest-based ads by following their instructions: <https://support.twitter.com/articles/20170405>. You can learn more about the privacy practices and policies of Twitter by visiting their Privacy Policy page: <https://twitter.com/privacy>.

Francom Group reserves the right to use Facebook. Facebook is a remarketing service is provided by Facebook Inc. You can learn more about interest-based advertising from Facebook by visiting this page: <https://www.facebook.com/help/164968693837950>. To opt-out from Facebook's interest-based ads follow these instructions from Facebook: <https://www.facebook.com/help/568137493302217>. Facebook adheres to the Self-Regulatory Principles for Online Behavioural Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the USA <http://www.aboutads.info/choices/>, the Digital Advertising Alliance. For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: <https://www.facebook.com/privacy/explanation>.

Francom Group reserves the right to use Instagram. Instagram is a remarketing service provided by Instagram Inc. You can learn more about interest-based advertising from Instagram by visiting this page: <https://help.instagram.com/402411646841720>. If you have any questions about Instagram's privacy policy or the service, please find the appropriate support channel in Instagram's Help Centre at which to contact us.

Francom Group reserves the right to use AdRoll. AdRoll is a remarketing service is provided by Semantic Sugar, Inc. You can opt-out of AdRoll remarketing by visiting this AdRoll Advertising Preferences web page: [http://info.evidon.com/pub\\_info/573?v=1&nt=1&nw=false](http://info.evidon.com/pub_info/573?v=1&nt=1&nw=false). For more information on the privacy practices of AdRoll, please visit the AdRoll Privacy Policy web page: <http://www.adroll.com/about/privacy>.

## **11. Complaints**

We would encourage you to make direct contact with us should you not be satisfied with the way in which we have dealt with your personal information. Upon receipt of your complaint we will reasonably attempt to deal with your complaint. Should you be of the view that our attempted resolution of your complaint was not reasonable, you may refer your matter to the Office of the Federal Privacy Commissioner at website: [www.privacy.gov.au](http://www.privacy.gov.au) or telephone 1300 363 992.'

## **12. Links to External Websites**

We have included links to external websites for your convenience. Francom Group is not aware of and is not responsible and/or liable for the content uploaded or the privacy practices of such external websites. It will be your responsibility to ensure that these websites comply with the relevant laws and privacy practices prior to your intended use of these websites. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

## **13. Confidentiality and Security**

We follow generally accepted industry standards to protect the personally identifiable information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

We limit access to Personal Information about you to employees who we believe reasonably need to come into contact with Personal Information to provide products or services to you or in order to do their jobs.

The security of your personal information is important to us.

#### **14. International Users**

If you are accessing the Website from any other region with laws or regulations that govern the collection of personal data or information, its use and disclosure which are different to Australian laws or our privacy policy as incorporated in our Terms and Conditions, then in that event, we wish to advise that by your use of the Website you will be transferring your personal information into Australia and that you consent to such transfer.

Your connection to the Website will be through Australian servers and all personal and general information collected by us will be processed within Australia where Francom Group servers and internal systems are located.

#### **15. Changes and Updates to this Privacy Policy**

Francom Group may update this Privacy Policy at any time in its sole discretion and without prior notice. We will strive to notify you about significant changes in the way we treat Personal Information by sending a notice to the primary email address specified in your account and/or by placing a notice on the Website.

#### **16. Effective Date**

This Privacy Policy was last modified in September 2021.