



Lasoo Pty Ltd.
L3, 35 Clarence St
NSW, 2000

Privacy Statement

This Privacy Policy sets out how LASOO PTY LTD (ABN 67 122 895 318) (LASOO) collects, shares and handles your personal information. LASOO is part of IVE GROUP LTD and its subsidiaries.

We respect your privacy and are committed to protecting your personal information. Our privacy policy outlines our approach to privacy and how we collect, use and protect your personal information. It also sets out your rights in relation to accessing the personal information we collect and hold about you. We are bound by Australian privacy legislation which includes the Australian Privacy Principles (or APP's) in the Privacy Act 1988 (Cth).

In this policy, personal information means information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion (source: Privacy Act 1988). <http://www.oaic.gov.au/privacy/privacy-act/the-privacy-act>

Personal Information

Personal information is defined in the Privacy Act 1988 (Cth) and means information or an opinion about an identified individual, or an individual who is reasonably identifiable.

Our websites may contain links to third party websites. We are not responsible for the privacy policies of any third party websites. We recommend that you review the privacy policy of each website you visit.

The types of personal information we collect and store may include:

- your name;
- your contact details, including email address, mailing address, street address and/or mobile phone number;
- bank and customer account details;
- details of products and services we have provided to you and/or that you have enquired about, and our response to you;

- your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour;
- information about your access and use of our Site, including through the use of Internet cookies, your communications with our Site, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider;
- additional personal information that you provide to us, directly or indirectly, through your use of our Site, associated applications, associated social media platforms and/or accounts from which you permit us to collect information; and
- any other personal information requested by us and/or provided by you or a third party.

We will only collect personal information by lawful and fair means and not in an unreasonably intrusive way.

Information

LASOO will not use personal information concerning an individual for a purpose other than the primary purpose for which it was intended.

We collect personal information for the primary purpose of conducting our business as an online retailer, trader and service provider (including as a marketplace for third party sellers to list and sell goods) including to:

- sell, deliver, administer, improve the products and services on our platform;
- personalise your experience on our platform and with our services;
- ensure the products and catalogues displayed on your home page feed and search results are available for purchase in your location;
- find store locations close to you; process payments including without limitation where you need to be over 18 years old to make liquor purchases;
- deal with feedback or complaints about the goods and service sold or available on our platform and provide remedies where required;
- undertake data analytics (including data matching with related companies to LASOO Pty Ltd. being IVE GROUP Limited and its subsidiary companies to enable us to better understand our customers' requirements and preferences, conduct product and market research,



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personalise and improve our platform, services, websites and apps (our platform), and to provide offers that are of greater interest or benefit to customers;

- communicate with you and to operate the customer service centre;
- undertake and administer promotions, competitions, marketing activities, direct marketing, database compilation and analytics, analysis of trends and demographics and other marketing or promotional activities;
- manage our stores, supply arrangements and inventory and administer our platform;
- recruit and assess future employees; and
- maintain and update our records.

The personal information we collect from you will include information you give us when you:

- register or subscribe to our platform or one of our newsletters;
- complete a transaction with us; and
- contact us.

In addition, we may collect personal information you disclose to third parties who are affiliated with us or otherwise provide services to us. This includes IVE Group Limited subsidiaries (Related companies), third parties who provide services to us or other third party services. These third parties will collect and store your personal information in accordance with their own privacy policies and procedures, which they will make known to you. We will take reasonable steps to ensure that the individual is made aware of the matters above.

We only collect sensitive information in circumstances where you consent to the collection of this information, or it is reasonably necessary for, or directly related to the purpose outlined above.

We may collect personal information from individuals who are not customers of our business but whose personal information is given to us by those individuals via our website (including [Help Centre](#)) or in the course of a transaction.

Where reasonably practicable, we attempt to collect personal information directly from the individuals themselves, or from our Related Companies.



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When we collect information, we will generally explain to the individual why we are collecting it, who we give it to and how we will use or disclose it or, alternatively, those matters will be obvious from the circumstances.

We will collect personal information from you by lawful and fair means and not in an unreasonably intrusive way.

When you visit our platform, we, and/or third parties, may place cookies, tags and pixels on your browser to enhance and manage our platform and improve our business and the services we provide to you.

We and/or Google may use this information to optimise and place advertisements, including advertisements of third party vendors and remarketing advertisements based on past visits to this platform, on our own and third party websites. Google's ability to use and share information collected by Google Analytics is restricted by the Google Analytics Terms of Use and Privacy Policy.

We and our Related Companies may combine this information with similar information from Related Company websites to undertake data analytics and matching, to personalise websites and (where you have consented to receiving offers or direct marketing) to offer products or provide services to you or send direct marketing to you.

In addition to personal information, we may collect other information about you or the device you use to access our platforms. By using our platform and agreeing to this policy, you grant us permission to place and store pixels, tags and cookies on your browser which may be used by us to collect information about how you use our platforms and websites you visit, including the following information:

- your device's operating system;
- your browser type and capabilities;
- your device's Internet Protocol (IP) address and geolocation;
- your browsing behaviour on our platforms including but not limited to:
 - products you have viewed, added to cart and/or purchased;
 - your searches and search history;
 - pages you have visited, including how you were referred to each page; and

- page usage statistics, including the time spent on each page;

In addition, third parties may place and read cookies on your browser or use web beacons or similar technologies to collect information, including, where applicable, for the Google Trusted Stores program or other third party affiliate marketing or aggregation services.

Cookies can be managed by accessing the individual settings in your browser.

Using and Disclosing Your Personal Information

We will generally use or disclose your personal information for the primary purpose for which it was collected, or for a related secondary purpose where you would reasonably expect us to use or disclose the personal information for that secondary purpose. We may otherwise use and disclose your personal information if you have given us consent in accordance with this Privacy Policy for the use or disclosure or it is required or authorised by law.

Generally, we use and disclose your personal information for the purpose of providing you with the goods or services that you have requested, or otherwise to enable us to carry out our business as an online retailer of goods and services, trader and service provider (including as a marketplace for third party sellers to list and sell goods).

As a marketplace platform, we will, where necessary, share your information with third party Sellers who transact using our platform. These Sellers may in turn share your information with parties who provide services to them (such as courier or delivery services providers) in order to provide goods and services to you.

We may generally disclose your information to third parties in order for them to provide or market services to you, such as our commercial partners for LASOO loyalty and reward program partners. We will not sell your personal information to third parties, and (unless connected with clauses 3.9 and 3.10 below) any third party we disclose information to will be for a purpose connected with your experience or the products or services provided on our platform or our business as an online retailer of goods and services, trader and service provider (including as a marketplace for third party sellers to list and sell goods).

If those purposes for which we have collected the information involve providing personal information about an individual to any third party, we will take appropriate and reasonable steps to ensure any personal information is protected.

We will only use personal information for marketing if you have given express or implied consent or it is impracticable to seek consent before this use.



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When registering with us or using the LASOO platform and its associated functionality, **you grant your express consent** to us using your personal information (such as your email address or phone number, purchase history, browsing history on our platform, and other information collected about you (directly or from our Related Companies) for direct marketing purposes about LASOO services, provided that it is in accordance with applicable laws, such as the *Spam Act 2003* (Cth). Direct marketing may include emails, SMS notifications and other forms of communication. You may opt out of receiving these direct marketing communications at any time by using the opt-out functionality provided in each marketing communication (e.g. by clicking “unsubscribe” at the bottom of an email), and you can managing your subscription preferences in your account.

When opting into 'Notify Me' emails, you consent to us sending you a notification email once a product on your Wishlist is back in stock. You may opt out of receiving these notification emails at any time and you can manage your notification preferences in the Wishlist section of your account.

We may disclose your information to (a) other members of the IVE Group; and (b) our Related Companies, each of whom may use that information to undertake data analytics and matching to enable them to better understand your requirements and preferences, and (if you interact with that business) to personalise and improve their offer to you and to offer products or providing services to you or send direct marketing to you (where you have consented to receiving direct marketing).

In addition, LASOO and our Related Companies disclose personal information to, and collect personal information from, each other to understand how you interact with them and what products and services you like, which allows LASOO and Related Companies to better understand your preferences and requirements, conduct product and market research, personalise and improve services, websites and apps and to provide offers that are of greater interest or benefit to you.

We may also provide your information to third parties that provide services to us, including third parties that provide our payment gateway, marketing, loyalty and reward program, logistics, customer service and technology support services. This may include providing your information to third parties that are located outside of Australia. When your personal information is transferred outside Australia (including the USA, UK, Hong Kong, the Philippines, Israel, Austria and other member states of the EU), we ensure that these parties treat your information with strict confidentiality and have appropriate data protection arrangements.

You agree and acknowledge that in the event we merge, sell or otherwise change control of our company, our business or the website to a third-party, you consent, without giving of prior notice, to



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our disclosure of your personal information and other data that we have collected from you to a third party or parties as part of such a transaction.

Security of Your Personal Information

We take steps to protect the personal information we hold against loss, unauthorised access, use, modification or disclosure and against other misuse. When no longer required, personal information is destroyed in a secure manner or deleted.

Access to Your Personal Information and Complaints Procedure

Under the *Privacy Act 1988* (Cth), you have certain rights to access the personal information we collect and hold about you.

Information we hold about you can be accessed by logging into your account on the platform and checking the information in the My Account page. You should ensure the information, such as delivery address and email, is up to date and accurate. You can find more information about the information held in your account [here](#).

You may make a request to receive any additional information we may hold about you, and we will provide this information to you within a reasonable time. When requesting such access please identify the precise type/s of information requested. You may make a request by contacting our [Help Centre](#).

We take steps reasonable in the circumstances to ensure that the personal information that we collect, use and disclose is accurate, up to date and complete. When an individual requests to correct information, we will take reasonable steps to correct the information, having regard to the purpose for which it is held. You may lodge a request to correct personal information in the manner outlined in clause 4.3 above.

To make a complaint about a breach of the Australian Privacy Principles, which includes how we handle your personal information, you may contact our [Help Centre](#). We will endeavour to respond to your complaint within a reasonable time after it is received. If you are not satisfied by our response, you may acquire further information regarding privacy from the Office of the Australian Information Commissioner.

LASOO retains personal information until it is no longer needed to provide or develop the service or until the individual who the personal information concerns asks us to delete it, whichever comes first. You can request the permanent deletion of your personal information via the Lasoo iOS or Android app, by visiting the 'Account' section, selecting 'My Details' and then clicking 'Delete Account'.



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Alternatively, you can request Lasoo support to permanently delete your personal information by emailing contact@lasoo.com.au or calling +61 2 9161 1593. It may take up to 30 days to delete your data from our systems following a valid request for deletion. However, LASOO will retain personal information in circumstances where it has a legal and regulatory obligation to do so (e.g. for law enforcement purposes, corporate or tax record keeping, where the information is relevant to legitimate legal proceedings or in keeping with its requirements under other Australian record keeping legislation) and anonymised information for analytic and service development purposes.

Data Breaches

In the circumstances where LASOO suffers a data breach that contains personal information, we will take all necessary steps to comply with the **Notifiable Data Breach Scheme** outlined in the *Privacy Act 1988* (Cth). This means we will immediately make an objective assessment of whether a breach of personal information is likely to result in serious harm to individuals, and if this is the case, endeavour to notify the affected individual(s) and the Australian Information Commissioner.

If an individual believes that their privacy policy has been breached, please contact us using the contact information below and provide details of the incident so that we can investigate it. LASOO requests that complaints about breaches of privacy be made in writing, so that we can be user about the details of the complaint. LASOO will attempt to confirm as appropriate and necessary with you your understanding of the conduct relevant to the complaint and what you expect as an outcome. We will inform you whether we will conduct an investigation, the name, title and contact details of the investigating officer and the estimated completion date for the investigation process. After LASOO has completed its enquiries, we will contact you, usually in writing, to advise the outcome and invite a response to our conclusions about the complaint. If we receive a response from you, we will assess it and advise if we have changed our view.

Privacy Collection Statement

The personal information that we collect from you will include information you provide us when you

- Use our platform;
- register or subscribe to our platform;
- complete a transaction with us; and
- contact us.

We may further collect personal information of individuals:

- from our related companies in the IVE Group being IVE Group Limited. and its subsidiary companies (Related Companies); or
- who are not customers of our business but whose personal information is given to us by those individuals via our website, including through customer service interactions, or in the course of a transaction.

All personal information will be collected by lawful and fair means and not in an unreasonably intrusive way.

We will use your personal information for the purpose of conducting our business as an online retailer, trader and service provider (including as a marketplace for third party sellers to list and sell goods) including personalising your experience on our platform and with our services, undertaking data analytics (including with our Related Companies) to enable us to better understand your requirements and preferences, and to provide offers that are of greater interest or benefit to you, undertake and administer promotions, competitions, marketing activities and direct marketing. For more information on why and how we collect your personal information, please view our Privacy Policy.

We also generally share your personal information:

- with our sister sites and Related Companies;
- as required or authorised by law;
- with third parties that provide services to us, or products or services directly or indirectly to you, as part of the use and functionality of our platform, including marketplace sellers you transact with, and third parties that provide our payment gateway, marketing, logistics and technology support services; and
- otherwise in accordance with our [Terms and Conditions of Use and Sale](#) and our Privacy Policy.

This may include providing your information to third parties that are located outside of Australia, including the USA, UK, Hong Kong, the Philippines and the EU. Where we do so, we ensure that these parties treat your information with strict confidentiality and have appropriate data protection arrangements.

In cases where personal information has been disclosed to any third party, we will take appropriate steps to ensure your personal information is protected.



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LASOO's Privacy Policy provides you with information about how you may:

- access your personal information held by LASOO and change that information, and
- complain about a breach of the Privacy Act 1988 (Cth) and how LASOO will deal with such a complaint.

LASOO's Privacy Collection Statement and Privacy Policy may change from time to time. The latest versions will be available online at <https://www.lasoo.com.au/privacy>.

For any questions or notices, please contact us at:

LASOO Pty Ltd (ABN 67 122 895 318)

Email: contact@lasoo.com.au

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