



## PRIVACY POLICY

Welcome to Stall Manager, we provide a streamlined solution to allow you to manage stallholders at your events or to apply to events that use our Services. We understand events and we also understand that protecting your personal information is important. This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or otherwise collected by us when providing our website, software and other services (**Services**) to you. In this Privacy Policy **we, us or our** means Firefly Hill Pty Ltd T/A Stall Manager ABN 73 607 461 656 and **you** means an individual we collect information from, including you as an **Event Organiser** using our Services to create and send forms, applications or questionnaires to organise and manage events and you as a **Stallholder** having received a form, application or questionnaire powered by our Services.

### Types of information

**Personal information:** is information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable.

**Sensitive information:** is a sub-set of personal information that is given a higher level of protection. Sensitive information means information relating to your racial or ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation or practices, criminal records, health information or biometric information.

### The information we collect

**Personal information:** The types of personal information we may collect about you include:

- your name;
- your contact details, including email address, mailing address, street address and/or telephone number;
- your age and/or date of birth;
- your credit card or payment details (through our third party payment processors currently Stripe and eWAY). We do not store your credit card and payment details;
- your location (your state and suburb or town);
- your preferences and/or opinions;
- information you provide to us through customer surveys;
- details of 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 Services, including through the use of Internet cookies, your communications with our online Services, 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 Services, associated applications, associated social media platforms and/or accounts from which you permit us to collect information;
- any other personal information requested by us and/or provided by you or a third party;
- if you are an Event Organiser, we may also collect:
  - your Australian Business Number;
  - details about your business including your business website and any business social media accounts;
  - details of events your business runs including the frequency of events, number of stalls at each event and financial revenue information related to stalls at each event;
  - contact details of your employees so that we can provide them with access to and allow them to use our Services on your behalf;
  - form and application data (questions and responses from Stallholders) for you to organise and manage events;
- if you are a Stallholder, we may also collect any information requested by an Event Organiser through a form, application or questionnaire powered by our Services, including:
  - your contact details;
  - your business details;
  - your identification details including photocopies of your driver's licence or passport;
  - required certifications and licences such as applicable food and liquor licences; and
  - details of any required insurances.

**Sensitive information:** We do not actively request sensitive information about you. If at any time we need to collect sensitive information about you unless otherwise permitted by law, we will first obtain your consent and we will only use it as required or authorised by law.

## How we collect personal information

We collect personal information in a variety of ways, including:

- **Directly:** We collect personal information which you directly provide to us, including when you register for an account to use our Services, through the 'contact us' and 'request a demo, quote or call back' forms on our website, when you request our assistance via email, our online chat or over the telephone or when you fill in a form, application or questionnaire powered by our Services.

- **Indirectly:** We may collect personal information which you indirectly provide to us while interacting with us, such as when you use our website, in emails, over the telephone and in your online enquiries.
- **From third parties:** We collect personal information from third parties, such as details of your use of our website from our analytics and cookie providers and marketing providers. See the “Cookies” section below for more detail on the use of cookies.

## Collection and use of personal information

**Personal information:** We may collect, hold, use and disclose personal information for the following purposes:

- to enable you to access and use our Services, including:
  - where you are an Event Organiser to provide you with a login and enable to you organise and manage events;
  - where you are a Stallholder, to provide information to Event Organisers and facilitate payment to Event Organisers (if applicable), to participate in events and assist Event Organisers in organising and managing events;
- to enable you to access and use our associated applications and associated social media platforms;
- to contact and communicate with you about our Services;
- for internal record keeping, administrative, invoicing and billing purposes;
- for analytics, market research and business development, including to operate and improve our Services, associated applications and associated social media platforms;
- to run promotions and/or offer additional benefits to you;
- for advertising and marketing, including to send you promotional information about our products and services and information that we consider may be of interest to you;
- to comply with our legal obligations and resolve any disputes that we may have;
- if you have applied for employment with us; to consider your employment application; and
- if otherwise required or authorised by law.

We may de-identify information you provide to us and use the aggregated data for analytical purposes and to improve our Services.

## Disclosure of personal information to third parties

We do not sell any personal information to third parties.

We do not disclose personal information to third parties, except where necessary. We may disclose personal information, where necessary, to:

- third party service providers for the purpose of enabling them to provide their services, to us, including (without limitation) IT service providers, data storage, web-hosting and server providers, debt collectors, couriers, maintenance or problem-solving providers, marketing or advertising providers, professional advisors and payment systems operators. Some of our third party service providers currently include: Amazon Web Services, SendGrid, Stripe, eWAY, Salesforce and Xero;

- our employees, contractors and/or related entities;
- our existing or potential agents or business partners;
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;
- courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;
- third parties to collect and process data, such as Google Analytics (to find out how Google uses data when you use third party websites or applications, please see [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/) or any other URL Google may use from time to time), Facebook Pixel or other relevant analytics businesses; and
- any other third parties as required or permitted by law, such as where we receive a subpoena.

**Overseas disclosure:** While we store your personal information in Australia, where we disclose your personal information to third parties listed above, these third parties may store, transfer or access personal information outside of Australia.

## Your rights and controlling your personal information

**Your choice:** Please read this Privacy Policy carefully. If you provide personal information to us, you understand we will collect, hold, use and disclose your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us, however, if you do not, it may affect our ability to provide our Services to you and your use of our Services.

**Information from third parties:** If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

**Anonymity:** Where practicable we will give you the option of not identifying yourself or using a pseudonym in your dealings with us.

**Restrict and unsubscribe:** To object to processing for direct marketing/unsubscribe from our email database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

**Access:** You may request access to the personal information that we hold about you. An administrative fee may be payable for the provision of such information. Please note, in some situations, we may be legally permitted to withhold access to your personal information.

**Correction:** If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to promptly correct any information found to be inaccurate, out of date, incomplete, irrelevant or misleading. Please note, in some situations, we may be legally permitted to not correct your personal information.

**Complaints:** If you wish to make a complaint, please contact us using the details below and provide us with full details of the complaint. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take in response to your complaint. You also have the right to contact the relevant privacy authority.

## Storage and security

We are committed to ensuring that the personal information we collect is secure. We store the personal information we collect in Australia through Amazon Web Services' data centre in Sydney. Where we disclose your personal information to third parties, third parties may store, transfer or access personal information outside of Australia. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures, to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

While we are committed to security, we cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk.

## Cookies

We may use cookies on our online Services from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do recognise you when you return to our online Services and allow third parties, such as Google and Facebook, to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. If and when you choose to provide our online Services with personal information, this information may be linked to the data stored in the cookie.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our online Services.

## Links to other websites

Our Services may contain links to other websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

## Amendments

We may, at any time and at our discretion, vary this Privacy Policy by publishing the amended Privacy Policy on our website. We recommend you check our website regularly to ensure you are aware of our current Privacy Policy.

**For any questions or notices, please contact our Privacy Officer at:**

Firefly Hill Pty Ltd T/A Stall Manager ABN 73 607 461 656

Email: [hello@stallmanager.com.au](mailto:hello@stallmanager.com.au)

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