

Gobble Privacy Policy

This is the privacy policy of KBNT Pty Ltd (ACN 636 191 243) ("Gobble"). Gobble is subject to and is governed by the Privacy Act 1988 (Cth).

This privacy policy sets out how Gobble will manage your personal information which we collect as a result of your membership of the smart phone application, Gobble ("the App"), your use of the App located at the Apple App Store or the Android Play Store, use of any pages or websites under the "Gobble" brand that are owned and/or operated by us (together, "the System") or whenever we otherwise deal with you. We are committed to ensuring that the personal information we collect about you is protected and is used, stored and disclosed in accordance with the Privacy Act and this privacy policy.

This privacy policy applies to all participants who register to use the App. This includes:-

- Restaurants registering as vendors on the System ("Vendors")
- Customers registering to use the App ("Users"); and
- Employees of the Vendors supplemented by Gobble qualified drivers who will be conducting deliveries ("Drivers").

System use

By using the App, you agree to be bound by the terms of this privacy policy. Gobble may review the privacy policy periodically and reserves the right to change the privacy policy at any time at its discretion by posting such changes on the System. Changes will be effected immediately when posted on the System. Your continued use of the System following posting of changes will constitute your acceptance of those changes.

This privacy policy will not apply to other applications which are linked to the App and over which Gobble has no control. In this privacy policy, a reference to "Australian Privacy Principles" ("APPs") means the APPs contained in the Privacy Act.

Personal information

The kinds of Personal Information that Gobble generally collects from Users is:

1. Name
2. Home address
3. Date of birth
4. Gender
5. Photographs or images used on the App

6. Personally submitted preferences
7. Bank account and credit card information
8. Food preferences
9. Location data
10. IP address
11. Other Identity verification information (i.e. email address, phone numbers)

The kinds of Information that Gobble generally collects from Vendors is:

1. Business name and trading name as registered with ASIC including ABN and ACN
2. Restaurant location/address
3. Contact details of Vendor's management
4. IP address
5. All relevant Food Services Licences, Food Safety certificates, Liquor Licences where relevant and all relevant certificates of compliance with the relevant food productions and consumption standards in Australia
6. All necessary permits required for the sale of food and liquor where necessary
7. Trading Licences where relevant
8. Public Liability and or Business Insurance registration details and any other insurance details required for the operation of the Vendors business
9. Workers Compensation Insurance details for Drivers the Vendor will supply engage to conduct the deliveries
10. Banking information for payment of products and services
12. Other identify verification information (i.e. email address, phone numbers)

The kinds of information that Gobble generally collects from Drivers is:

1. Details pertaining to a current Northern Territory Driver's Licence of the Driver
2. Vehicle registration details of any and all vehicles that will be used by the Driver to conduct deliveries
3. Insurance details of any and all vehicles to be used for deliveries
4. Employer details
5. Bank account information
6. Other identify verification information (i.e. email address, phone Numbers).

Collection Purposes

Gobble will collect your Personal Information only by lawful and fair means and not in an intrusive way to enable Gobble to operate its business as a licensed online facilitator for the delivery of food and beverages from food outlets to end users for the following purposes:

- A. to process your application to become a user of Gobble
- B. to provide services to you as a User
- C. to identify you as a User for security purposes and to comply with our legal obligations
- D. to maintain your User ordering account
- E. to provide your order on the App to your choice of Vendor
- F. to upgrade and enhance your experience within the System, or to tailor or develop information, services or products to suit your needs which may include market research and conducting promotions
- G. to tell you about our products or services that we think may be of interest to you by communicating with you via email, SMS or telephone
- H. to create aggregate data about Users through demographic profiling, statistical analysis of the database to provide to potential and existing stakeholders, and to allow for more efficient operation of Gobble's business
- I. to determine Users' liability to pay goods and services tax and other taxes where applicable
- J. to comply with Gobble's legal and statutory obligations including in relation to customer identity verification and reporting obligations imposed by the Anti-Money Laundering and Counter Terrorism Act 2006(Cth) ("**AML/CT Act**") the Northern Territory Food Act 2004 ("**Food Act**") and the Northern Territory Liquor Act 2019 ("**Liquor Act**") to enable Gobble to take appropriate action if Gobble has reason to suspect that unlawful activity or misconduct of a serious nature has been, is being or may be engaged in
- K. to establish, exercise or defend any legal claims.

You may choose to deal with us on an anonymous basis or to use a pseudonym unless it is not practicable for us to deal with individuals who we cannot identify or we are required by law to only deal with identified individuals (such as under the AML/CTF Act). Also, if you do not provide Gobble with the Personal Information we request, we may be unable to process your application to become a User, provide you with our services or respond to your enquiry or complaint.

By becoming a User or otherwise choosing to provide Gobble with Personal Information you consent to Gobble collecting, using and disclosing your Personal Information for the above purposes.

Direct marketing and opting out

From time to time we may use your Personal Information to inform you about Gobble's products or services or about promotional activities which Gobble believes may be of interest or of benefit to you. We may do this via email, SMS, telephone, mail or through pop-up notifications on the App.

If you no longer wish to receive marketing or promotional material from Gobble at all or in any particular form, you may contact us at any time by email to support@gobble.com.au with your request with which we will comply as soon as practical.

From time to time we may contact you in relation to the management and administration of your Gobble account. These communications can be via any of the modes of contact recorded when registering as a Member. Such communication does not affect your opt-in or opt-out status for direct marketing communications.

Management of your Personal Information

Gobble will take all reasonable steps to ensure that the Personal Information which it collects, uses or discloses is correct and is stored in a secure environment which is accessed only by authorised persons.

Gobble will destroy or permanently de-identify the Personal Information we hold when it is no longer required for any purpose permitted under the APPs including our legal or operational obligations.

Disclosure

Personal Information collected by Gobble may be disclosed to a third party in the following circumstances:

1. to provide you with the services or support/information you have requested;
2. for any other purpose related to the purposes for which your Personal Information was collected as described in this policy which you would reasonably expect or which has been otherwise notified to you;
3. the third parties or classes of third parties that Gobble has at the time of collection informed you of;
4. to enable Gobble to participate in activities with business partners and sponsors, who will be notified to you at the time your Personal Information is collected;

5. where the disclosure is required or authorised by law or otherwise permitted under the Privacy Act;
6. to protect and maintain the integrity of the Vendors / any applicable Australian Food and Safety Standards / any regulatory body making inquiries into the operation of our System or notifying such regulatory body of any activity Gobble considers to be unusual or suspicious;
7. where you have consented to its disclosure either expressly or by the circumstances and your conduct.

Gobble will take all reasonable steps to ensure that any Personal Information which Gobble discloses to a third party is protected by that party in accordance with the Privacy Act.

Security of Personal Information

You acknowledge that no data transmission over the Internet is totally secure. Accordingly, Gobble does not warrant the security of any information which you transmit to it. Any information which you transmit to Gobble is transmitted at your own risk. However, once Gobble receives your transmission, Gobble will take reasonable steps to protect your Personal Information from misuse, loss and unauthorised access, modification and disclosure including by using password protected systems and databases and **Secure Socket Layer technology**.

Gobble's employees, agents and contractors are required to maintain the confidentiality of Members' Personal Information and trading behaviour. Information posted on bulletin boards or communicated within a social media environment (for example, Facebook, Twitter, Instagram, Chat Rooms) becomes public information. Gobble cannot guarantee the security of this type of disclosed information.

We take seriously the responsibility to exclude children from access to our services. We will not accept their information for the purposes of opening an ordering account. It is however, ultimately the responsibility of parents or guardians to monitor their children's Internet activities including where appropriate by using Internet screening software.

Ultimately, you are solely responsible for maintaining the secrecy of your username, password and any account information. Please be careful whenever using the Internet and our System.

Access to Personal Information

You may access the Personal Information collected by Gobble by following the "My Profile" link on the website or by contacting us on the Customer Service hotline. We will give you access to your Personal Information in the manner requested if that is possible and within a reasonable period. If we refuse your request or cannot give you access in the manner you have requested, we will do what we can to meet your requirements by other means.

We may not be required to give you access to your Personal Information in certain circumstances which are set out in the APPs including where it may have an unreasonable impact on other individual's privacy. If we refuse access for such reasons, we will advise you in writing of the refusal and our reasons and the complaint mechanisms available to you.

Correction and Continuous Updating of your Personal Information

Gobble takes reasonable measures to ensure that Personal Information which it collects is accurate, complete and current and also when it uses and discloses it, that it is relevant, having regard to the purpose for which it is being used or disclosed. We will take reasonable measures to correct Personal Information if we are satisfied that it should be corrected. We may contact you on a periodic basis to seek the most up to date information from you.

If you believe that the Personal Information Gobble holds about you is inaccurate, incomplete or not current, please let Gobble know and we will correct it if we are satisfied that a correction is required. Personal Information can be updated or corrected by you in the "Account Details" section of the System at any time after you log in. Subject to identity verification, Personal Information can also be updated or corrected by calling Gobble's Customer Service hotline.

Details of your transactions can be also found in the "Account History" section of the Member Services section of the App.

Use of System

By using this System or any of our products including the App, you agree to Gobble collecting and processing your Personal Information on the basis provided for by this privacy policy. If you have any queries, requests for access or correction or complaints relating to the handling of your personal information, please contact the Privacy Officer, whose contact details are as follows:

Compliance Manager

Gobble Pty Limited

Email: support@gobble.com.au

Updates to this Privacy Policy

Further Information about privacy concerns or complaints in Australia can be found on the Office of the Australian Privacy Commissioner's website at www.oaic.gov.au.

This is the privacy policy of KBNT Pty Ltd (ACN 636 191 243) ("Gobble").

Gobble may review, change and update this privacy policy from time to time reflect our current practices and obligations. We will publish our current privacy policy on our App and the changes will take effect at the time of publishing. You should review this privacy policy regularly and remain familiar with its terms. For a copy of our current privacy policy, please contact us at the contact details above.