

Privacy Policy – BD Water and Water Manager

[Version 1.1 - Last updated 5 January 2021]

We believe privacy is important and have created this policy to let you know how we handle the personal information we receive and hold about you, who we share it with, how we keep it secure and what your rights are. We aim for compliance with the Australian Privacy Principles.

This policy covers how we handle personal information collected from our business BD Water, our website www.bdwater.com.au, our water trading platform aap.watermanager.com.au, any related websites we control, social media platforms we control, and our Apps (collectively called ‘website’ in this policy). In general, the more interaction we have with you, the more personal information we are likely to collect from you.

Under the Australian Privacy Act 1988 (Cth), personal information is information about a living person which can be used (by itself or together with other information) to reasonably identify that person. For example, your name and email address are personal information.

Our details

If you have any questions or concerns about our handling of your personal information, please use the contact details below to contact us.

Name:	BD Water Pty Ltd ABN 86 642 510 334
Address:	Level 2, 11 Mounts Bay Road, Perth WA 6000, Australia
Email:	contact@bdwater.com.au

When we talk about ‘us’ or ‘our’, we mean our company as identified above.

When we talk about ‘you’, ‘user’ or ‘your’, we mean you, the user of, or visitor to, our website.

In general, we only use your personal information for the delivery of our services, to provide information, to send you a publication you have requested, for limited follow up marketing emails (which you may opt out of) or as otherwise disclosed in this policy. We never sell or giveaway your personal information.

1. Staying Anonymous

You can browse our website anonymously (although cookies may identify your IP address). If you wish to use any of our services, request information to be sent to you or register for an account, you will need to identify yourself and at that point we will start collecting your personal information. If you do not give personal information to us, it will affect our ability to provide you with requested information, services or account.

2. Collecting personal information

At all times we try to only collect the minimum information we need to provide the services you have requested, complete our business functions and marketing and to keep our records up to date.

We collect information directly from you (for example when you supply it to us online or in person), indirectly from you (based on your use of our website and interaction with our services), from third parties (for example our payment supplier Stripe will cross check your name and IP when you make payments and our on-site crew who will pass on information relevant to the services you have requested), and from our third party advertising and marketing partners. Direct and indirect collection are expanded below:

a. Direct collection

The main way we directly collect personal information about you is when you give it to us, for example:

- when you contact us
- when you submit information to our website or in person
- when you talk with us in person (for example to discuss work we can complete for you)
- when you ask for access to the information we hold about you
- when you register for an account on our water trading platform

b. Indirect collection

Due to the nature of the services we offer, we may collect information about you from third parties. This may be done in person or via automated components of our website.

For example, if someone calls on your behalf or provides us with information about you, we may collect the information they provide and the caller's name and contact details as well.

If we are compiling information about a water licence, we may obtain information about you from third parties, including government agencies, and will collect and retain this information.

We may cross check identification document or licence numbers supplied by you against third party government databases and will record and store the outcome of this check. This may be an automated or manual process.

When you use our website, we may receive data from third parties such as analytics providers and advertising networks like Google and Facebook.

If you select the 'chat' function on our website and elect to converse with us via Messenger, we will be provided with access to your public information on this service.

We will not intentionally collect personal information that is unintentionally disclosed.

3. What do we collect?

What information we collect depends on the services you request.

If you request bore drilling, irrigation services or other services from our main business website or by contacting our office, we will generally collect your full name, email address, street address and your phone number, together with any other information you supply to us that is relevant to the services you request or information we obtain from third parties. Payments are completed via Stripe and Xero who have their own privacy policies dealing with the information you enter. If you phone our office to make a direct payment via credit card, we enter the information you provide directly into Stripe or Xero, we do not store your financial information.

If you use our water trading platform, we will generally collect the following types of information (depending on how you use the platform):

- Your full name, residential address, telephone and email contact details
- Identification information provided by you. Note: we use Government identifier numbers to cross check validity of identification however we do not store these numbers
- Details of your listing (seller), water requirements (buyer), use of the water trading platform and water licence transfer
- Information required to submit a trade to the relevant Government Department
- Any other information you provide, or we receive from third parties

Payments for our commission are made via Stripe and are not stored in our database.

If you are a seller on the platform we will additionally collect and store information about:

- Details of the water licence you are selling (for example property address, information from the water

licence register, water allocation being sold)

- Listing price
- Details of intended use of any remaining allocation on the licence that is not being sold
- Whether the licence is being sold as part of a property sale

If you are a buyer on the platform we will additionally collect and store information about:

- Intended use of the water allocation
- Availability of infrastructure to take groundwater
- Confirmation of ownership of property and the financial resources to undertake the proposed activities

We will retain your personal information while it is still relevant for the use it was provided, or for any period we need to keep information for tax or business purposes.

4. How do we use your personal information and who do we share it with?

We collect and use your personal information to provide our services and for our related business purposes.

Additionally, we use or share your information as follows:

- We use it for administrative and billing purposes (if applicable).
- We will share your personal information with authorised persons (if you have provided us authority to do so) or as required for Government Departments (for example to register a water allocation transfer).
- We will share your personal information when we are required to do so by law
- We will share your personal information if there is a dispute or we have a conflict of interest. For further information about this potential disclosure, please see our conflict of interest policy [insert link]

Importantly, when we share your information with the Department of Water and Environment (DWER), they will use your information in accordance with their own privacy policy. You should expect that DWER will share all (or some) of the information on the Form 4T transfer with the other party involved in the trade, at the time when the Form 4T is lodged for registration. This will likely include your contact details.

We will also share your personal information (eg. contact details) for business purposes including:

- Cross marketing of other services we have available that we feel you may be interested in.
- Parties that work with us and third party suppliers we engage to provide services, for example IT and system administration services or website developers. In this case, we will require them to use that information only for the purpose of providing the services we have requested.
- Payment third parties if there is a dispute over a payment. For example, if our third-party payment provider contacts us regarding a dispute over a payment, we will provide them with requested information and billing details on our system etc to allow the payment dispute to be resolved.
- Professional advisers including accountants, lawyers, bankers, auditors and insurers for the compliant operation of our business.
- Government bodies that require us to report processing activities.
- Third parties where we are required to in accordance with the law. We reserve the right to fully co-operate with any law enforcement authorities or court order requiring or requesting us to disclose the identity or other usage details of any user of our online services, or in accordance with a properly executed court order, or as otherwise required to do so by law.
- If we sell our business, with the legitimate buyer of our business (however only if they have a privacy policy that offers similar protections for your personal information as this policy)

5. Direct Marketing

We may send you direct marketing about our products or services. You may always opt out of receiving this marketing by letting us know. For example, if we send you an email there will be an opt-out option at the

bottom of the email. Opting out of marketing will have your details removed from our marketing list but will not change the way we use other personal information we hold about you.

6. Testimonials

Where you provide a testimonial for our services, you consent to our use of your name, supplied image (if any), service you used, together with your testimonial. You agree we may use testimonial information on our website, or for marketing purposes.

We may continue to use testimonial information for as long as it is relevant to our business. You may withdraw your consent to use your testimonial and we will cease to display your testimonial on our website however we may not be able to remove all historical references, references incorporated in previous publications or references previously used in marketing.

7. Social media platforms and messaging systems

Be aware that if you connect with us on social media or make a comment on any other forum that is public, you will be making your status as our client, or someone related to a client, part of public record. If you share personal information on these platforms, we may collect it and use it.

We may also use your personal information via social media to let you know about our services or upcoming offers or events.

If you do not consent to our collection or use of information in this manner, please do not post your information or connect with us in these venues.

8. How we use Cookies and other identifiers

Like most websites, we use a range of tools provided by third parties, including search engine browsers and our web hosting company, to collect or view website traffic information. These sites have their own privacy policies.

To help us provide better user experience, grow our business, and improve the quality of our services, we also use:

- cookies and session tools to provide functional and special features on our website and to allow our website to remember you when you return
- tracking cookies or remarketing pixels for analytical and advertising purposes

Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. Some website features may not function properly without cookies. To find out how to opt out of tailored advertising please check the options available here -

<http://www.networkadvertising.org/choices/>.

9. Third Party Links

Our website may contain links to other websites who will have their own privacy policies. Once you leave our website, we are no longer responsible for your personal information and you should ensure you are familiar with the privacy policies of third party sites you visit.

10. Security and overseas recipients

We use industry accepted safe practices and appropriate password protection for our systems and aim to ensure our third-party providers use similar care with your personal data. No security measures are 100% safe however and your data is stored with us at your own risk. We take reasonable steps to protect all personal information within our direct control from misuse, interference, loss, unauthorised access, unlawful or accidental destruction, modification or disclosure. To prevent unauthorised access or disclosure we use

respected hosting services, firewall and other electronic security procedures and managerial procedures to safeguard and secure the information we collect from you.

If you have an on-line account, it is protected by a password you choose. It is important that you keep your password and computer secure to prevent unauthorised access to your account. You should log-out of your account when not using it and decline to use the 'autofill or remember password' functions if these are offered via your operating system.

We rely on third party providers to store the information you have provided to us securely and your data will cross international borders. Where possible, we nominate Australia as the storage country however, for many of our third party providers, this is not possible, and your information will be sent or mirrored internationally. Not all countries have the same level of privacy protection as Australia and you acknowledge and agree to our transferring of your personal data across international borders in this way. We aim to use reputable third party providers.

Hard copy files generated are stored in Australia until they are no longer required and then they are securely destroyed.

11. Accessing and correcting your personal information – Your legal rights

You have the right to know what information we hold about you and to ensure the information is accurate and up to date.

If you wish to exercise any of the rights, please contact us using our contact details in schedule 1.

You will not have to pay a fee to access your personal data. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. We may also refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. For record keeping purposes, we will record and store all information exchanged during an exercise of your rights under this clause.

We try to respond to all legitimate requests within 30 days. Occasionally it may take us longer if your request is particularly complex or you have made a number of requests. In this case, we will notify you.

12. Problems?

If you have any concerns about our use of your personal information, please let us know what the problem is in writing to the email address shown in the schedule at the top of this policy. We will do our best to help and will respond to your concerns within 30 days.

If, after lodging a complaint with us, you are not happy with how we managed your concerns, you can contact the Australian Privacy Commission, available at <http://www.oaic.gov.au>.

13. Updates

We regularly review our privacy policy and may update it from time to time. The updated provisions will apply from the date they are posted on our website, so we recommend that you re-visit this privacy policy when you use our online services. We show a version number and last updated date at the top of our policy to make it easier for you to keep track of changes.

End.