



# Privacy Policy

## 1 Introduction

Advanced Fresh Concepts Pty Ltd ABN 35 605 455 936 trading as AFC and/or Sushi Izu (**we, our, us**) recognise the importance of protecting the privacy and the rights of individuals in relation to their personal information. This document is our privacy policy and it tells you how we collect and manage your personal information.

We respect your rights to privacy under the *Privacy Act 1988 (Cth)* (**Privacy Act**) and we comply with all of the Privacy Act's requirements in respect of the collection, management and disclosure of your personal information.

## 2 What is your personal information?

When used in this privacy policy, the term "personal information" has the meaning given to it in the Privacy Act. In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number, email address and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

## 3 What personal information do we collect and hold?

We may collect the following types of personal information about you:

- your name and contact details (such as address, email address, telephone and facsimile numbers);
- if you have visited, posted on or interacted with our website or our social media pages (including Facebook, Instagram), the information that you have shared with us on those platforms (such as your social media account name, your email address and any photographs that you shared);
- if you are a customer and have participated in any promotional activities that we or our franchisees may run from time to time, other information that you submit to us as part of the promotional activities;
- if you are a customer and have lodged a complaint or claim against us or one of our franchisees or contractors, any personal information (including date of birth and health information) that you may have submitted as part of the complaint or claim;
- if you are an employee or contractor, your birth date, your job title and health information relating to your employment or engagement with us;
- if you are prospective franchisee or a franchisee, information that you provide to us as part of the application process or during your time as a franchisee (such as the details of your background and experience, your previous employment, your financial information and your credit information);

- if you are a franchisee, information about your franchise with us; and
- any additional information relating to you that you provide to us directly through our website, or through our representatives or otherwise.

We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect aggregated information about how users use our website.

#### **4 How do we collect your personal information?**

We collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect in ways including:

- if you are a prospective franchisee or a franchisee, when you submit your franchise application to us, throughout the application process, and also through your franchise relationship with us;
- if you are an employee or contractor or a job applicant, when you submit your application to us, or through your relationship with us;
- when you submit any complaint or claim against us or one of our franchisees;
- when you participate in our promotional activities (including online promotional activities conducted on our website or social media pages);
- through your access and use of our website and our social media pages (including by posting any messages or photographs, or “liking” us); or
- during conversations between you and our representatives.

We may also collect personal information from third parties such as:

- if you are a prospective franchisee, a franchisee or an applicant for a job, referees;
- if you have submitted any complaint or claim against us or a franchisee, AFC franchisees or contractors and insurers; and
- more generally, from law enforcement agencies and other government entities.

#### **5 What happens if we can’t collect your personal information?**

If you do not provide us with the personal information described above, some or all of the following may happen:

- we may not be able to consider your application to become a franchisee;
- we may not be able to continue our relationship with you under the franchise agreement;
- you may not be able to participate in the promotional activities;

- we may not be able to process, manage and/or investigate a complaint or claim made by you against us or our franchisee or contractor; or
- we may be unable to tailor the content of our website to your preferences and your experience of our website may not be as enjoyable or useful.

## **6 For what purposes do we collect, hold, use and disclose your personal information?**

We collect personal information about you so that we can perform our business activities and functions and to provide best possible quality of customer service. We collect, hold, use and disclose your personal information for the following purposes:

- if you are a prospective franchisee or job applicant, to consider your application and to manage the application process;
- if you are a franchisee, employee or contractor of us, to manage and maintain our relationship with you;
- if you are a customer or potential customer, to conduct promotional, marketing and advertising activities;
- if you have interacted with our website or social media pages, to respond to your posts and comments and to conduct promotional, marketing and advertising activities;
- to conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- for the administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes of us and our franchisees;
- to update our records and keep your contact details up to date;
- if you have submitted a complaint or claim against us or one of our franchisees, to process, investigate, manage and respond to the complaint or claim, to inform and liaise with our insurer; and
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority.

Your personal information will not be shared, sold, rented or disclosed other than as described in this privacy policy.

## **7 Our website and social media presence**

Our privacy policy also applies to our website at [www.sushiizu.com.au](http://www.sushiizu.com.au) and our social media pages.

## **Website logs**

We or our hosting service provider may log IP addresses (that is, the electronic addresses of computers connected to the internet) date and time of your visit to the site, pages you accessed, type of browser you are using and referring site to administer the website and gather broad demographic information.

## **Security**

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

## **Links**

Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

## **Social media platforms**

We do not operate, host or control any social media platforms on which we may have a presence. We therefore make no representations or warranties in relation to the privacy practices of the social media platform operators, and we are not responsible for how the social media platform operators may collect, use, store or host your personal information. You should inform yourself about their privacy practices.

## **8 Who do we disclose your information to?**

We may disclose your personal information to:

- our employees, related bodies corporate, franchisees, suppliers, contractors or service providers for the purposes of operation of our website or our business, fulfilling requests by you, and to otherwise provide services to you including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants;
- our insurers for claims management purposes;
- suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes; and
- any organisation for any authorised purpose with your express consent.

We may combine or share any information that we collect from you with information collected by any of our related bodies corporate.

## **9 Direct marketing materials**

If you are a customer, we may send you direct marketing communications and information about our products that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email and if applicable, social media platforms, in accordance with applicable marketing laws, such as the *Spam Act 2003* (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list.

## **10 Do we disclose your personal information to anyone outside Australia?**

We may disclose personal information to our related bodies corporate and third party suppliers and service providers located overseas for some of the purposes listed above.

We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

We may disclose your personal information to entities located outside of Australia, including our related bodies corporate, located in the United States.

## **11 Security and data quality**

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure.

We may hold your information in either electronic or hard copy form. Personal information is destroyed or de-identified when no longer needed or when we are no longer required by law to retain it (whichever is the later).

## **12 How can you access and correct your personal information?**

You may request access to any personal information we hold about you at any time by contacting us (see the details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We may charge you a reasonable fee to cover our administrative and other reasonable costs in providing the information to you. We will not charge for simply making the request and will not charge for making any corrections to your personal information. As part of this request, we may need to verify your identity.

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment, then we will add a note to the personal information stating that you disagree with it.

### **13 What is the process for complaining about a breach of privacy?**

If you believe that your privacy has been breached, please contact us using the contact information below and provide details of the incident so that we can investigate it. We will treat your complaint confidentially, investigate your complaint and aim to ensure that we contact you and your complaint is resolved within a reasonable time (and in any event within the time required by the Privacy Act, if applicable).

After we have completed our 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.

### **14 Contacting us**

If you have any questions about this privacy policy, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please contact our Privacy Officer using the details set out below. We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in timely and appropriate manner.

Please contact our Privacy Officer at:

Post: Privacy Officer  
Damien Blakeney  
Unit 12, 512 Gardeners Road  
Mascot NSW 2020

Tel: (02) 9667 5800

Email: [damien.blakeney@afcsushi.com.au](mailto:damien.blakeney@afcsushi.com.au)

### **15 Changes to our privacy policy**

We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website and will be effective from the date of posting. Although we intend to observe this policy at all times, it is not legally binding on us in any way. From time to time we may regard it as necessary or desirable to act outside the policy. If we do so, we will still comply with any statutory right that you may have under the Privacy Act or other applicable legislation.

This privacy policy was last updated on 19 October 2016, version 1.