

Privacy Policy - Fast Twitch

This document sets out the policy of Fast Twitch and its related companies in relation to the privacy of your personal information (Privacy Policy). Fast Twitch is committed to protecting the privacy of the personal information it collects and receives. Fast Twitch is bound by the Australian Privacy Principles (APP) contained in the Privacy Act 1988 (Cth) (Act). A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at www.aaic.gov.au. This Privacy Policy applies to all your dealings with Fast Twitch whether at one of Fast Twitch's clubs or via Fast Twitch's website (www.fasttwitch.com.au).

This Privacy Policy seeks to explain:

- the kinds of personal information Fast Twitch collects & holds;
- how Fast Twitch collects and holds your personal information;
- why Fast Twitch collects, holds, uses and discloses your personal information;
- how you may access and seek the correction of your personal information as held by Fast Twitch;
- how you may complain about a breach of the APPs or a registered APP code (if any) that Fast Twitch is bound by, and how Fast Twitch will deal with such a complaint;
- and if Fast Twitch is likely to disclose your personal information to overseas recipients and the countries in which such recipients are likely to be located (if it is practicable to specify those countries in this policy).

By using Fast Twitch's website www.fasttwitch.com.au, completing any membership application forms, personal trainer forms or competition entry forms, you accept this Privacy Policy and expressly consent to Fast Twitch's collection, use and disclosure of your personal information in the manner described in this Privacy Policy.

WHAT INFORMATION WE COLLECT

Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect include:

- name, age, gender, date of birth & next of kin;
- health information (height, weight, medical conditions);
- health and fitness goals;
- license and banking details;
- contact details (including phone and e-mail);
- views and opinions; and
- responses to forms and surveys (if any)

CONSENT

Our Privacy Policy applies to your personal information regardless of the way in which we collect it, for example, whether it is collected via one of our websites, when you visit one of our venues, when

you contact one of our customer service departments or visit one of our social media sites. By submitting information to us and/or accessing and using our websites or social media platforms you consent to us using and disclosing your personal information in the ways described in this Privacy Policy.

HOW WE COLLECT YOUR PERSONAL INFORMATION

Fast Twitch will solicit your personal information by lawful and fair means directly from you unless it is unreasonable or impracticable to do so.

Fast Twitch will collect personal information:

- by email;
- when you visit or call one of our venues to ask about our services (including SMS);
- via our official social media pages that we control, such as the official pages for our various businesses on Facebook, Twitter and Instagram and over the intranet (including surveys);
- by written correspondence (such as letters);
- on hard copy forms (including registration forms, competition entry forms and surveys);
- in person; or
- through Fast Twitch's website (online purchases, web form submission, "contact us" or participation in a live chat);
- via mobile sites, applications, widgets and other mobile interactive features (collectively "Apps"), for example, when you provide feedback via a QR Code App;
- use of the club access card; and
- if your photograph is taken at one of our venues;

Some of our venues have surveillance cameras which may capture your image on film. We may use this information in respect of the management and security of our venues and it may be provided to law enforcement and government bodies for these purposes. We may also collect personal information from third parties, for example:

- your personal trainer;
- market researchers & direct marketing providers;
- parents or guardians of underage members;
- our current members (refer a friend);
- debit and payment service providers who process transactions on behalf of our various businesses;
- market research organisations we engage to conduct market research;
- our official pages on social media platforms and from people with whom you are friends or otherwise connected on social media platforms; and
- recruiters we have retained and from referees you have provided in support of a job application
- the Australian Tax Office (ATO) and the Australian Securities and Investment Commission (ASIC); and
- public sources (directories, membership lists, professional and trade associations, ASIC, bankruptcy or court registry searches)

WHY WE COLLECT YOUR PERSONAL INFORMATION

Fast Twitch only collects personal information (being information that identifies or could reasonably identify an individual) where Fast Twitch considers it to be reasonably necessary for Fast Twitch's services, functions and activities. The main purposes for which Fast Twitch collects, holds, uses and discloses personal information are to provide services and benefits to members and to grow Fast Twitch's membership.

Fast Twitch collects personal information to:

- deliver our products and service to members;
- process and manage membership applications;
- facilitate members & casual members gym access;
- conduct marketing activities, research & special offers;
- accurately identify who is using Fast Twitch's services;
- communicate with members & website visitors to Fast Twitch's website and online enquiries;
- profile our members & their interests;
- manage & run Fast Twitch's website & social media platforms;
- provide you with information about Fast Twitch's services;
- deliver or enhance Fast Twitch's products and services;
- help Fast Twitch maximise the benefits provided to members;
- respond to your query or feedback;
- process your order;
- inform you about the products and services of our commercial partners
- process and consider your application for employment;
- conduct market research and to improve our product and service offering;
- operate Fast Twitch's business;
- transfer memberships between clubs as per Fast Twitch's transfer policy.
- for any other purposes that you would reasonably expect; and
- enable us to comply with our obligations under the law.

Fast Twitch's website requires subscriptions or registrations to use certain services, functions or content. You will know what information is being collected via these processes when you complete the relevant forms and provide the required details prior to submitting the application. Fast Twitch will collect data relating to any transactions you carry out through Fast Twitch's website and the fulfilment of your order. Fast Twitch may also use your data to monitor for any unauthorised use of Fast Twitch's website, content or subscriptions to Fast Twitch's services

SENSITIVE INFORMATION

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

It is Fast Twitch policy to only collect your sensitive information where it is reasonably necessary for Fast Twitch functions or activities and either you have consented or Fast Twitch are required or authorised under law to do so.

ACCESS BY CHILDREN

As we cannot distinguish the age of people accessing our gyms or website without proof, our Privacy Policy applies to all individuals. If a person under eighteen years of age has provided us with personal information without parental or guardian consent, those details may be removed by emailing us at info@fasttwitch.com.au

DO YOU HAVE TO PROVIDE PERSONAL INFORMATION?

You can refuse to provide personal information. However, a refusal may mean that the service you requested is not provided or membership will be refused or forfeited.

ANONYMITY AND PSEUDONYMS

You have the option of not identifying yourself or using a pseudonym when dealing with Fast Twitch provided that is it lawful and practicable.

Fast Twitch will try to accommodate a request for anonymity if possible. However, your right to anonymity does not apply in relation to a matter if:

- Fast Twitch is required/authorised by law or court/tribunal order to deal with identified individuals; or
- it is impracticable for Fast Twitch to deal with individuals who have not identified themselves.

It is Fast Twitch's policy to enable you to access Fast Twitch's website and make general phone queries without having to identify yourself and to enable you to respond to Fast Twitch's surveys anonymously. In some cases however, if you don't provide Fast Twitch with your personal information when requested, Fast Twitch may not be able to respond to your request or provide you with our service.

For example, we may not be able to respond to your enquiry, assess your application, enter you in a promotion, or send you requested information.

WHEN WE DISCLOSE YOUR PERSONAL INFORMATION

We may disclose your personal information in a variety of circumstances including to:

- related entities of Fast Twitch;

- contractors, agents and suppliers we engage to provide products and/or perform services for us,
- for example customer feedback analysts, digital marketing agencies, online shopping cart service providers, photo processing companies, payment processors and personal trainers;
- commercial partners with whom we have agreed information sharing arrangements;
- our professional advisors, such as lawyers and accountants;
- law enforcement bodies;
- a purchaser of all or part of Fast Twitch's business; and
- any other person for any other purposes that would be reasonably expected (including if required by law).

When third parties perform services on our behalf, we take reasonable steps to ensure the third party will protect your personal information in accordance with Australian privacy laws and in a manner consistent with this Privacy Policy. Third parties are required to restrict their use of the personal information to the purpose for which it was provided. We have service providers in the United States of America and New Zealand, but the location of our service providers may change from time to time.

We do not sell your name or other personal information to third parties.

UPDATING YOUR PERSONAL INFORMATION

We take reasonable steps to ensure that the personal information we collect and use is accurate, complete and up-to-date. However, the accuracy of the information we hold depends to a large extent on the information you provide.

You can update (or request us to update) your personal information at any time. We ask you to keep your information as current as possible so that we may continue to provide you with useful information.

To update your details, please email us at henry@fasttwitch.com.au. If you would like to unsubscribe or "opt out" from receiving any direct marketing material from Fast Twitch, that option will be available in the relevant communication sent to you. We will respond to your unsubscribe request within a reasonable period after your request is made.

SECURITY OF YOUR PERSONAL INFORMATION

Fast Twitch stores information in different ways, including paper and electronic form. Fast Twitch takes reasonable steps to protect it from misuse, interference, loss, unauthorised access, modification or disclosure including:

- secure password protected databases for storage;
- confidentiality requirements of staff;
- security firewalls for access to Fast Twitch's systems;
- servers kept at a secure location with limited access;
- document storage security requirements;

- granting access only to verified individuals; and
- access controls for Fast Twitch's buildings;

Fast Twitch cannot guarantee that personal information will be protected against unauthorized access or misuse and Fast Twitch does not accept any liability for the improper actions of unauthorised third parties.

Fast Twitch will retain your personal information for as long as necessary to fulfil Fast Twitch's obligations to you, to protect its legal interests, to comply with laws or as otherwise stated to you when Fast Twitch collects your personal information.

Once Fast Twitch is no longer required to retain your personal information, Fast Twitch will take reasonable steps to destroy your personal information or to ensure that your personal information is de-identified.

CHANGES TO OUR PRIVACY POLICY

From time to time we may need to change this Privacy Policy to reflect our changing business practices and/or changes in the law. We may therefore change this Privacy Policy at any time by posting the amended Privacy Policy on our websites or other social media platforms. All personal information collected and held by us will be governed by our most recent Privacy Policy as posted on our websites or other social media platforms.

PRIVACY COMPLAINT OR CONCERN

If you have a complaint or concern about the way in which your privacy has been handled by Fast Twitch, please email us at info@fasttwitch.com.au. We will respond by email within 2 working days confirming receipt of your complaint or concern. We will then proactively investigate your complaint or concern and provide you with our response within a reasonable timeframe. If, after receiving our response, you still consider that your privacy complaint or concern has not been resolved, you may then take your complaint to the Office of the Australian Information Commissioner (www.oaic.gov.au).