

# Privacy Policy

Effective Date: [20<sup>th</sup> April 2022]

## Our commitment to your privacy

The privacy of individuals, including our staff and our clients, is of utmost importance to MBMT Pty Ltd ABN 53 656 219 911 trading as Meal Match. This includes information or opinions about you that we collect and record which reasonably could be used to identify you. We adhere to the National Privacy Principles and the *Privacy Act 1988* (Cth), together with any codes of conduct or guidelines issued by the relevant regulatory authorities.

When this Privacy Policy mentions “we,” “us,” or “our,” it refers to Meal Match.

All capitalised terms shall have the meaning set forth in the [Terms](#) unless otherwise defined in this [Privacy Policy](#).

This document sets out our policies for managing personal information across our business operations in Australia. We have a Privacy Officer, whose contact details are below.

We want you to know how we may collect, use, share, and keep information about you and the choices that are available to you. When we provide products or services to you, we may also give you additional details about how we will use your personal information.

This Privacy Policy applies to Meal Match websites, and online services that may run on smart phones, tablets, and other mobile devices (“apps”). It does not apply to those websites that have their own online privacy statements and terms of service, such as Stripe Payments Australia Pty Ltd ACN 160 180 343.

Not all the information described in the Privacy Policy is ‘Personal Information’ under the Privacy Act - some of the Online Information we collect does not identify you (for example, some information we collect using cookies or information that is aggregated or de-identified).

Our websites and apps are not intended for children under 18 years of age. We do not knowingly solicit data online from, or communicate online to, children under 18 years of age.

Since we may change this Privacy Policy, we recommend that you check the current version available from time to time. If we make changes to this Privacy Policy, we will update the Effective Date at the top of this page.

You acknowledge that for the purposes of this Privacy Policy, Meal Match is the Data Controller for Personal Data stored on the Platform, Meal Match Payments Pty Ltd ACN 628 118 641, Snipcart Inc. and Stripe Payments Australia Pty Ltd ACN 160 180 343 will also be the Data Controller (the “**Payments Data Controller**”) of your information related to the Payment Services, and one or more Snipcart Inc. and Stripe Payments Australia Pty Ltd entities are the Data Processors in respect of any Personal Data.

## Types of personal information we collect

The types of information we collect depends on which product or service you use and how you interact with us.

When dealing with our customers and clients we generally collect your name, address,

telephone number and other contact details. Depending on the type of interaction you may have with Meal Match, we may also collect and update personal information necessary to establish your identity and personal financial situation, such as date of birth, domicile, citizenship status, employment details, bank account details, tax file number, drivers licence, passport, basic financial information, and other information about your financial and credit history.

We generally do not collect sensitive information (such as relating to ethnic origin, religious or philosophical beliefs, membership of a political or trade association, sexual preferences or health), and would not do so without your consent. Meal Match does not collect information in a way that is unfair or unlawful. The collection of information will not intrude unreasonably on the personal affairs of the individual concerned.

We may gather online information if you:

- Visit or use our websites, apps or Meal Match Platform;
- Receive or reply to electronic communications from us;
- View or click on our ads or other online content; and
- Interact with us through social media websites and other websites and apps.

## Why we collect personal information

Generally, we collect, hold, update and use personal information about you related to our functions and activities so we can establish, manage and administer the products and services provided by us, and to comply with legal and regulatory obligations. We also use, store, and process information about you to provide, understand, improve, and develop the Meal Match Platform, and to create and maintain a trusted and safer environment. We may also use and disclose your information for purposes related to those mentioned above, including:

- to provide requested services to you, and bill you for our services and collect overdue payments;
  - to enable you to access and use the Meal Match Platform and enable you to communicate with other Members;
  - to operate, protect, improve and optimize the Meal Match Platform and experience, such as by performing analytics and conducting research;
  - to personalize or otherwise customize your experience by, among other things, ranking search results or showing ads based on your search, history, and preferences;
  - to enable you to access and use the payment and delivery services;
  - to provide customer service;
  - to send you service or support messages, such as updates, security alerts, and account notifications;
  - for our research and development of new products and services;
  - for training, quality control and verification purposes (including monitoring and recording your telephone conversations with us from time to time);
  - to communicate our promotional materials to you;
  - for record keeping, data analytics and auditing;
  - to detect and prevent fraud, spam, abuse, security incidents, and other harmful activity;
  - to conduct investigations and risk assessments;
  - to verify or authenticate information or identifications provided by you (such as to verify your address or compare your identification photo to another photo you provide);
  - to conduct checks against databases and other information sources;
  - to resolve any disputes with any of our Members and enforce our agreements with third parties;
  - to enforce our [Terms](#), [Payments Terms](#), and other [Policies](#).
  -
- and
- to meet our legal obligations.

## How we collect information

Generally, we collect personal information directly from you, in response to our direct mail, e-mail, forms that you complete and submit to us, or when you have other dealings with us. We may collect that information over the telephone or internet, in person (when you visit us at Meal Match office) and when you write to us.

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

- a third party business that provides commercial financial information;
- market research organisations;
- other credit providers;
- persons authorised by you (such as lawyers or accountants);
- referees (if you give us the name of someone who can give a reference about you); and
- publicly available sources of information.

We only collect your information from external sources if it is impractical to collect it directly from you, or when we are permitted to do so.

We (and our [Service Providers](#)) also collect information through [Cookies and Similar Technologies](#). Most [Cookies and Similar Technologies](#) will only collect [De-Identified Information](#) such as how you arrive at our website or your general location. However, certain [Cookies and Similar Technologies](#) do collect Personal Information. For example, if you click *Remember Me* when you log in to our website, a cookie will store your username.

We (and our [Service Providers](#)) may collect information using [Cookies and Similar Technologies](#) about:

- the device you use to access our websites or apps (for example, we may collect information about the operating system or the browser version and the type of computer or mobile device);
- the [IP Address](#) and information related to that [IP Address](#) (such as domain information, your internet provider and general geographic location);
- browsing history on our websites or apps (such as what you search for, the pages you view, how long you stay, and how often you come back);
- how you search for our websites or apps, and from which website or app you came from;
- which ads or online content from us you view, access, or click on;
- whether you open our electronic communications and which parts you click on (for example, which links you use); and
- the location of your mobile device (for example, to help prevent fraud or when you register to receive location-based content on our mobile websites or apps).

We (and our [Service Providers](#)) may also collect information made publicly available through third-party platforms (such as online social media platforms), through online databases or directories, or that is otherwise legitimately obtained.

## What happens if I do not provide information that has been requested?

It is your choice whether to provide your personal information or not. However, if you don't, we might be unable to fulfil your request for a specific product or service or be able to identify you to protect you against fraud.

## How we store information

We store personal information in a combination of secure computer storage facilities and

paper based files and other record formats. We have taken a number of steps to protect the personal information we hold from misuse, loss and unauthorised access, modification or disclosure. We use generally accepted technology and security so that we are satisfied that your information is transmitted safely to us through the internet or other electronic means. We will take reasonable steps to securely destroy or permanently de-identify personal information when we no longer need it.

We are continuously implementing and updating administrative, technical, and physical security measures to help protect your information against unauthorized access, loss, destruction, or alteration. However, the internet and mobile devices are not a 100% secure environment so we can't guarantee the security of the transmission or storage of your information.

## When we may disclose your personal information

By continuing to use this to use the Platform, you agree and consent to the use, disclosure and storage of your personal information under this policy.

Generally, we may disclose personal information about you in the following circumstances:

- to comply with our legal obligations (we notify you any time we are required to produce information in this way unless we are prohibited by court order or law or there is suspicion of fraud and/or criminal activity);
- where we suspect that unlawful activity has been or may be engaged in and the personal information is a necessary part of our investigation, resolution or reporting of the matter;
- where we are satisfied on reasonable grounds that disclosure is necessary to lessen or prevent a serious threat to the life, health, safety or welfare of an individual or to public health, safety or welfare;
- the disclosure is necessary for research or the compilation or analysis of statistics in the public interest, but does not involve the publication of the personal information in a form which would identify an individual;
- financial advisers, brokers and other parties authorised by us;
- other areas and organisations within Meal Match group that provide financial and other services, for reasonable business purposes;
- anyone authorised by you or to whom you have provided your consent (either expressly or impliedly).

### Disclosure outside of Australia

Personal information that we collect may be stored, disclosed, or processed in and transferred between any of the countries in which we operate to enable the use of the information in accordance with this Privacy Policy.

When you provide your personal information to us, you consent to the disclosure, storage, and processing of your personal information outside of Australia and acknowledge that, in doing so, we will not be accountable under the *Privacy Act 1988* (Cth) (**Privacy Act**) for the treatment of that personal information by the overseas recipients. However, we will take steps that are reasonable in the circumstances to ensure that any overseas recipient will deal with such personal information in a way that is substantially similar to the way in which the relevant Australian Privacy Principles in the Privacy Act protects such personal information.

### With Your Consent

We may share your information at your direction or as described at the time of sharing, such as when you authorize a third party application or website to access your Account.

### Sharing between Buyers and Kitchens

To help facilitate bookings, we may share your information with other Members as follows:

- When you as a Buyer submit a purchase request, certain information about you is shared with the Kitchen, including your full name, your purchase history, and other information you agree to share. When your purchase is confirmed, we will disclose additional information to assist with coordinating the purchase, like your phone number and address.
- When you as a Kitchen have a confirmed sale, certain information is shared with the Buyer to coordinate the sale, such as your full name, phone number, and address.

We don't share your billing and payout information with other Members.

### **Profiles, Listings, and other Public Information**

The Meal Match Platform lets you publish information that is visible to the general public. For example:

- Parts of your public profile page, such as your first name, your description, and city, are publicly visible to others.
- Public Listing pages are publicly visible and include information such as the approximate location (neighbourhood and city), Listing description and photo, aggregated demand information (like page views over a period of time), and any additional information the Kitchen chooses to share.
- After completing a sale, Buyers and Kitchens may write reviews and rate each other. Reviews are a part of your public profile page.
- If you submit content in a public forum or social media post, or use a similar feature on Meal Match Platform, that content is publicly visible.

Information you share publicly on Meal Match Platform may be indexed through third party search engines. In some cases, you may opt-out of this feature in your Account settings. If you change your settings or your public-facing content, these search engines may not update their databases. We do not control the practices of third party search engines, and they may use caches containing your outdated information.

### **Service Providers**

We use a variety of third party service providers (such as the Payments Data Controller) to help us provide services related to the Platform. Service providers may be located inside or outside of Australia. For example, service providers may help us: (i) verify or authenticate your identification, (ii) check information against public databases, (iii) assist us with background checks, fraud prevention, and risk assessment, or (iv) provide customer service, advertising, or payments services. These providers have limited access to your information to perform these tasks on our behalf, and are contractually obligated to use it consistent with this Privacy Policy.

### **Additional Services by Sellers**

Sellers may use third party services available through Meal Match Platform to assist with managing their Listing. Sellers may use features on Meal Match Platform to share information about the Buyer (like Buyer name, Buyer phone number, and Buyer anonymized email address) with that third party service provider for the purposes of coordinating the sale or delivery.

### **Meal Match Payments**

Meal Match may share your personal information to: (i) provide the Payment Services, (ii) facilitate your use of the Platform, and (iii) jointly market products or services to you with other financial third parties with whom Meal Match Payments has a formal agreement. You can unsubscribe or opt-out from receiving such marketing communications by sending us an email.

## **Safety and Compliance with Law**

Meal Match may disclose your information to courts, law enforcement or governmental authorities, or authorized third parties, if and to the extent we are required to do so by law or if such disclosure is reasonably necessary: (i) to comply with legal process and to respond to claims asserted against Meal Match, (ii) to respond to verified requests relating to a criminal investigation or alleged or suspected illegal activity or any other activity that may expose us, you, or any other of our users to legal liability, (iii) to enforce and administer our [Terms of Service](#) or other agreements with Members, (iv) for fraud investigation and prevention, risk assessment, customer support, product development and debugging purposes, or (v) to protect the rights, property or personal safety of Meal Match, its employees, its Members, or members of the public.

## **Widgets**

We may display parts of Meal Match Platform (e.g. your Listing page) on sites operated by Meal Match's business partners, using technologies such as widgets or APIs. If your Listings are displayed on a partner's site, information from your public profile page may also be displayed.

## **Aggregated Data**

We may also share aggregated information (information about our users that we combine together so that it no longer identifies or references an individual user) and non-personally identifiable information for industry and market analysis, demographic profiling, marketing and advertising, and other business purposes.

[Aggregated Information](#) or [De-identified Information](#) does not identify you individually; it helps us to analyse patterns among groups of people. We may share [Aggregated Information](#) or [De-identified Information](#) in several ways, for example:

- for the same reasons as we might share [Personal Information](#);
- with [Business Partners](#) to help develop and market programs, products or services and present targeted content including [Targeted Advertising](#);
- with [Business Partners](#) to conduct analysis and research about customers, website and app users; or

with [Third-Party Ad-Servers](#) to place ads (including ads of our [Business Partners](#)) on various websites and apps, and to analyse the effectiveness of those ads.

## **Analyzing your Communications**

We may review, scan, or analyze your communications on Meal Match Platform for fraud prevention, risk assessment, regulatory compliance, investigation, product development, research, and customer support purposes. For example, as part of our fraud prevention efforts, we scan and analyze messages to mask contact information and references to other websites. In some cases, we may also scan, review, or analyze messages to debug, improve, and expand product offerings. We use automated methods where reasonably possible. However, occasionally we may need to manually review some communications, such as for fraud investigations and customer support, or to assess and improve the functionality of these automated tools. We will not review, scan, or analyze your communications to send third party marketing messages to you, and we will not sell reviews or analyses of these communications.

## **Linking Third Party Accounts**

You may link your Meal Match Account with your account at a third party social networking service. Your contacts on these third party services are referred to as “Friends.” When you create this link:

- some of the information you provide to us from the linking of your accounts may be published on your Meal Match Account profile;
- your activities on Meal Match Platform may be displayed to your Friends on Meal Match Platform and/or that third party site;
- a link to your public profile on that third party social networking service may be included in your Meal Match public profile;
- other Meal Match users may be able to see any common Friends that you may have with them, or that you are a Friend of their Friend if applicable;
- other Meal Match users may be able to see any schools, hometowns or other groups you have in common with them as listed on your linked social networking service;
- the information you provide to us from the linking of your accounts may be stored, processed and transmitted for fraud prevention and risk assessment purposes; and
- the publication and display of information that you provide to Meal Match through this linkage is subject to your settings and authorizations on Meal Match Platform and the third party site.

## Third party partners & integrations

Meal Match Platform may contain links to third party websites or services, such as third party integrations, co-branded services, or third party-branded services (“**Third Party Partners**”). Meal Match doesn’t own or control these Third Party Partners and when you interact with them, you may be providing information directly to the Third Party Partner, Meal Match, or both. These Third Party Partners will have their own rules about the collection, use, and disclosure of information. We encourage you to review the privacy policies of the other websites you visit.

## Will my personal information be used for direct marketing?

We use and disclose your personal information to keep you informed about the range of financial products and services offered by us.

You may opt out of receiving direct marketing from us at any time by contacting the Privacy Officer - details below.

## Keeping us up-to-date

We will take reasonable steps to make sure that the personal information we collect, use or disclose is accurate, complete and up-to-date. If your personal details change, such as your telephone number or billing address, please contact us so that we can continue to provide you with our services.

You may review, update, or delete the information in your Account by logging into your Account and reviewing your Account settings and profile.

For information on how to cancel your Account, visit [www.mealmatch.com.au/help](http://www.mealmatch.com.au/help). Note that information that you have shared with others (like Reviews or forum postings) may continue to be publicly visible on Meal Match Platform in association with your first name, even after your Account is cancelled.

## Cookies & Similar Technologies

If you do not want us to collect information about you using [Cookies & Similar Technologies](#) you can disable or delete them. Most computer systems and browsers offer their own privacy

settings. We encourage you to use them to enhance your choices. Most browsers' advanced settings (such as those in Internet Explorer, Google Chrome or Safari) allow you to disable [Cookies & Similar Technologies](#).

**Important** - If you do disable or delete [Cookies & Similar Technologies](#), some site features and services may not work. You will need to manage your settings for each computer and browser you use to access the Internet.

## Keeping us up-to-date

We will take reasonable steps to make sure that the personal information we collect, use or disclose is accurate, complete and up-to-date. If your personal details change, such as your telephone number or billing address, please contact us so that we can continue to provide you with our services.

You may review, update, or delete the information in your Account by logging into your Account and reviewing your Account settings and profile.

For information on how to cancel your Account, visit [www.mealmatch.com.au/help](http://www.mealmatch.com.au/help).

## You can access your personal information

Following a request, we will provide you with a copy of personal information which we hold about you in accordance with our obligations under the *Privacy Act*. We may charge a fee for retrieving this information (we will inform you of the fee before providing the information). Please note that there are some circumstances set out in the *Privacy Act* where we may refuse your request.

We will promptly acknowledge and investigate any complaints about the way we manage personal information.

## About this Privacy Policy Statement

We may update our policies and this Privacy Policy from time to time. The latest version is published on our web site at <http://www.mealmatch.com.au/> and is available in print at Meal Match offices, or by contacting us using the details below.

**Contacting us** If you have any questions about our policies, or if you wish to update or access the information we hold about you, wish to make a related complaint, opt out of receiving direct marketing material, or to receive a copy of our most current [Privacy Policy](#), please telephone us on:

support@mealmatch.com.au

or write to us at:

**The Privacy Officer**  
**MBMT Pty Ltd**  
**PO BOX 2561**  
**Wellington Point QLD 4160**  
**Australia**

If Meal Match takes more than 30 days to respond to your privacy complaint, or if you are dissatisfied with the outcome, you can make a complaint to the Privacy Commissioner at the Office of the Australian Information Commissioner. The OAIC can be contacted on 1300 363 992 or at [www.oaic.gov.au](http://www.oaic.gov.au)

## Glossary

**Account** means your account on Meal Match Platform.

**Aggregated Information** - data or information relating to multiple people which has been combined or aggregated. Aggregated Information includes information that we create or compile from various sources, including card transactions or certain data from Cookies and Similar Technologies.

**Meal Match (we, our, us)** – MBMT Pty Ltd ABN 53 656 219 911 trading as Meal Match as identified at the beginning of this Privacy Policy.

**Cookies and Similar Technologies** - a cookie is a small data file that an app or website transfers to your computer's hard drive. We may place cookies when you use our websites or apps or where you use another company's website and apps that our ads appear on. We may also place cookies when you request or personalize information, or register for certain services. If you accept these cookies, you may give us access to information about your interests. We may use that information to personalize your experience. Similar technologies such as web beacons, pixels, gifs, and tags also do the same thing. We use the term Cookies and Similar Technologies in this statement to refer to all technologies that collect information in this way.

**Data Controller** means a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any Personal Data is, or is to be, processed.

**Data Processor** means a person (other than an employee of the Data Controller) who processes the Personal Data on behalf of the Data Controller.

**De-identified Information** - data or information used in a way that does not identify you to a third party. We often derive De-Identified Information from Personal Information. It includes information that we may collect from various sources, such as card transactions or certain data from [Cookies and Similar Technologies](#).

**IP Address** - a number assigned to a device when connecting to the Internet.

**Online Information** - data or information which may include Personal Information, Aggregated Information and De-Identified Information collected on our websites and apps as well as on websites and apps of third parties relating to topics about our business.

**Other Information** - Meal Match internal information, information from our Business Partners, and other online and offline information we collect from or about you.

**Personal Information** - means information or an opinion about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion (such as name, address or telephone number), and whether the information or opinion is recorded in a material form or not, which relates to a living individual who is identified or can be identified: (a) from that data; or (b) from that data and other information which is in the possession of, or is likely to come into the possession of, the Data Controller or the Data Processor.

**Service Providers** - any vendor, third party and/or company that performs business operations on our behalf, such as printing, mailing, and other communications services (email, direct mail, etc.), marketing, data processing, servicing, collections, or ad management.

**Targeted Advertising** - ads we, or our [Service Providers](#), display on websites or apps outside Meal Match based on the preferences or interests inferred from data collected from a particular

computer or device regarding web viewing behaviors over time and across different websites and apps.

**Meal Match Platform** - applies to Meal Match websites, and online services that may run on smart phones, tablets, and other mobile devices (“apps”).

**Third-Party Ad-Servers** - companies that provide the technology to place ads on websites (and apps) and track how ads perform. These companies may also place and access cookies on your device. The information they collect from our websites or apps is in a form that does not identify you personally.