

Legal

Privacy Policy

Effective May 23, 2018

WWOOF Pty Ltd takes data privacy seriously, the privacy of our visitors and members is extremely important to us. This privacy policy explains who we are, how we collect, share and use Personal Information, and how you can exercise your privacy rights.

This Privacy Policy governs the manner in which WWOOF Australia collects, maintains, uses and discloses information collected from users (known as "Users") of our website and mobile app site (collectively known as "Sites"). This Privacy Policy applies to the Sites and all products and services offered by WWOOF Australia.

We recommend that you read this privacy policy in full to ensure you are fully informed. However, to make it easier for you to review the parts of this privacy policy that apply to you, we have divided up the document into sections that are specifically applicable to Members (Section 2), Contacts (Section 3), and Visitors (Section 4). Sections 1 and 5 are applicable to everyone.

If you have any questions or concerns about our use of your Personal Information, then please contact us using the contact details provided at the end of Section 5.

1. The Basics

A. About Us

WWOOF Pty Ltd is an online membership program (the "**Services**") a company headquartered in the State of Victoria in Australia ("**we**," "**us**," "**our**," and "**WWOOF Pty Ltd**").

The Services enable our Members to, among other things, connect with each other to arrange volunteer placements on host properties. We also provide other related services. Find out more about our Services [here](#).

B. Key Terms

In this privacy policy, these terms have the following meanings:

"**Contact**" is a person a Member may contact through our Services. For example, if you are a volunteer Member, a host Member would be considered a Contact.

"**Member**" or "**User**" means any person or entity that is registered with us to use our Services.

"**Personal Information**" means any information that identifies or can be used to identify a Member, a Contact, or a Visitor, directly or indirectly. Examples of Personal Information include, but are not limited to, first and last name, email address, gender, occupation, or other demographic information.

"**Website(s)**" or "**Sites**" means any website(s) we own and operate (such as wwooof.com.au) or any web pages, interactive features, applications, widgets, blogs, social networks, social network "tabs," or other online, mobile, or wireless offerings that post a link to this privacy policy.

"**Visitor**" means any person who visits any of our Websites.

"you" and "your" means, depending on the context, either a Member, a Contact, or a Visitor.

2. Privacy for Members

This section applies to the Personal Information we collect and process from a Member or potential Member through the provision of the Services. If you are not a Member, the Visitors or Contacts section of this policy may be more applicable to you and your data. **In this section, "you" and "your" refer to Members and potential Members.**

A. Information We Collect

The Personal Information that we may collect broadly falls into the following categories:

(i) **Information you provide to us:** In the course of engaging with our Services, you may provide Personal Information about you, and sometimes, your family. Personal Information is often, but not exclusively, provided to us when you sign up for and use the Services, consult with our customer service team, send us an email, or communicate with us in any other way.

We will let you know prior to collection whether the provision of Personal Information we are collecting is compulsory or if it may be provided on a voluntary basis and the consequences, if any, of not providing the information. By giving us this information, you agree to this information being collected, used and disclosed as described in our Terms of Use and in this privacy policy.

This information may include:

Personal identification information

WWOOF Australia collects information about you when you go on line and register for either a host or WWOOF membership, update your profile, ask for customer support or subscribe to our newsletter. Users of our sites may be asked for, name, email address, mailing address, telephone numbers, birth date, gender, photos, username, personal website URL, descriptions of your place, travel plans and other details you choose to make available. All members signing up for a membership with WWOOF Australia must provide their full name as it appears on their passport or official identification.

Registration information: You need a WWOOF Pty Ltd account to use the Services as a Member. When you register for an account, you will be asked to provide certain basic information, as described above.

Billing and communications information: If you purchase our Services, you may also need to provide us with payment and billing information, such as your credit card details and billing address. WWOOF Pty Ltd will also maintain a record of your billing transactions and purchases, and any communications and responses.

Information we process on your behalf: In order to use certain features in your account, you need to include your contact information which is made available to other members so they can contact you.

Why we use collected information

WOOOF Australia may collect and utilise Users personal information for the following purposes:

- It's a great tool to improve our Sites: The feedback you provide assists us in improving our products and services.
- It gives us a great insight to our customer's needs.
- At WOOOF Australia we may use your email address to communicate with you about all technical /security updates and to send support messages when required. If Users decide to opt-in to our mailing list, they will receive emails that may include WOOOF Australia newsletters, updates, related product or service information. Should the User choose to unsubscribe from receiving future newsletter emails, they may do so by contacting us via our Sites or clicking the un-subscribe link in newsletters and emails.
- To protect the safety of WOOOF Australia Users and confirm Users' identities.
- To keep the site safe and to mediate disputes we are able to monitor messages sent through our system, but we do not routinely monitor messages.
- We do apply certain automated filters to show WOOOF volunteer's general position on a map if they have allowed location-based services through their browser or device.

(ii) **Information we collect automatically:** When you use the Services, we may automatically collect certain information about your device and usage of the Services. We use cookies and other tracking technologies to collect some of this information. Our use of cookies and other tracking technologies is discussed more below.

This information may include:

Non-personal identification information

We may collect non-personal identification information about Users devices whenever they interact with our Sites. Such information may include hardware model, operating system version, unique device identifiers, mobile network information and how User devices interact with our Sites.

Information about User location may be collected each time you access or use our Sites when you allow this information to be collected. Location-based services can be controlled by altering the settings of your Internet browser or mobile device. However, this may mean that certain parts of our Sites will not operate properly.

Like many other websites, WOOOF Australia makes use of log files. The information inside log files includes internet protocol (IP) addresses, browser type, Internet Service Provider (ISP), date/time stamp and referring/exit pages. This information is used to administer the Sites, track User movement around the Sites, and gather demographic information. IP addresses, and other such information are not linked to any information that is personally identifiable.

WOOOF Australia uses web browser cookies to enhance User experience, to store information about User preferences, to record User-specific information on which pages Users access, for User's host or WOOOFer lists and to understand usage, this is a great reporting tool which allows us to improve our business model to suit the needs highlighted from this information. Many web browsers are set to accept cookies by

default. You can choose to set your browser to not allow browser cookies, however doing so may cause parts of our Sites to not operate properly.

Device information: We collect information about the device and applications you use to access the Services, such as your IP address, your operating system, your browser ID, and other information about your system and connection.

Log data: Our web servers keep log files that record data each time a device accesses those servers and those log files contain data about the nature of each access, including originating IP addresses. We may also access metadata and other information associated with files that you upload into our Services.

Product usage data: We collect usage data about you whenever you interact with our Services, which may include the dates and times you access the Services and your browsing activities (such as what portions of the Services are used). We also collect information regarding the performance of the Services, including metrics related to the deliverability of emails and other communications you send through the Services. This information allows us to improve the content and operation of the Services, and facilitate research and analysis of the Services.

(iii) **Information from the use of our mobile apps:** When you use our mobile apps, we may collect certain device and usage-related information in addition to information described elsewhere in this privacy policy.

Device information: We may collect information about the type of device and operating system you use. We do not ask for, access, or track any location-based information from your mobile device at any time while downloading or using our mobile apps or Services.

Product usage data: We may use mobile analytics software (such as Google Analytics) to better understand how people use our application. We may collect information about how often you use the application and other performance data.

Google Analytics: WWOOF Australia uses Google Analytics, a third-party web measurement tool. Google Analytics places a cookie on your computer so that it can recognise your computer if you visit our Sites in the future. This cookie does not collect personal identifying information. Please review the Google Analytics privacy policy for more information: <http://www.google.com/analytics/learn/privacy.html> Users who choose to disable Google Analytics will still have full access to the Sites.

Social Media tools and Third Party privacy policies: The Sites offer third party social sharing features which allow Users to share actions and information with other websites, the general public, User community and/or the third-party operating the third-party site. You should consult the respective privacy policies of the third parties that provide these social sharing features for more detailed information on their practices as well as for instructions about how to opt-out of certain practices. The Sites use Google Maps in host profiles for Locations and other 3rd party maps for Member Searches. When you use Google Maps, you are subject to the Google privacy policy

B. Use of Personal Information

We may use the Personal Information we collect through the Services or other sources for a range of reasons, including:

- **To bill and collect money owed to us by you.**

This includes sending you emails, invoices, receipts, notices of delinquency, and alerting you if we need a different credit card number. We use third parties for secure credit card transaction processing, and those third parties collect billing information to process your orders and credit card payments. To learn more about the steps we take to safeguard that data, see the "Our Security" section of this privacy policy.

- **To send you system alert messages.**

For example, we may inform you about temporary or permanent changes to our Services, such as planned outages, or send you account, security or compliance notifications, such as new features, version updates, releases, abuse warnings, and changes to this privacy policy.

- **To communicate with you about your account and provide customer support.**

For example, if you use our mobile apps, we may ask you if you want to receive push notifications about activity in your account. If you have opted in to these push notifications and no longer want to receive them, you may turn them off through your operating system.

- **To enforce compliance with our Terms of Use and applicable law, and to protect the rights and safety of our Members and third parties, as well as our own.** This may include developing tools and algorithms that help us prevent violations.

For example, sometimes we review the content of our Members' Profiles, photos, messages and forum posts to make sure they comply with our Terms of Use. Our employees may review these details. This benefits all Members who comply with our Terms of Use because it helps us maintain the integrity of the WWOOF Program. Email and the WWOOF messaging system was not built for confidential information. Please do not use the WWOOF Pty Ltd messaging system to send confidential information.

- **To meet legal requirements**, including complying with court orders, valid discovery requests, valid subpoenas, and other appropriate legal mechanisms.
- **To provide information to representatives and advisors**, including attorneys and accountants, to help us comply with legal, accounting, or security requirements.
- **To prosecute and defend a court, arbitration, or similar legal proceeding.**
- **To respond to lawful requests by public authorities**, including to meet national security or law enforcement requirements.
- **To provide, support and improve the Services.** For example, this may include sharing your information with third parties in order to provide and support our Services or to make certain features of the Services available to you.

When we share Personal Information with third parties, we take steps to protect your information by requiring these third parties to enter into a contract with us that requires them to use the Personal Information we transfer to them in a manner that is consistent with this privacy policy and applicable privacy laws.

- **To provide suggestions to you (when searching for a volunteer or Host).**

This includes making the content of your profile subject to key word search criteria for other members, to assist in finding suitable Hosts or volunteers. For more information about our use of cookies and other tracking technologies for this purpose, and instructions about how to opt out of having data collected through the use of cookies, please see our Cookie Statement.

We may use data from WWOOF Pty Ltd accounts to enable product recommendation, audience segmentation, and predicted demographics features for our Members. We will act as a data controller to process data for our data analytics projects in reliance on our legitimate business interests of improving and enhancing our products and services for our Members. As always, we take the privacy of Personal Information seriously, and will continue to implement appropriate safeguards to protect this Personal Information from misuse or unauthorized disclosure.

- **Combined information.** We may combine Personal Information with other information we collect to serve you specifically, such as to deliver a product or service according to your preferences or restrictions, or for advertising or targeting purposes in accordance with this privacy policy. When we combine Personal Information with other information in this way, we treat it as, and apply all of the safeguards in this privacy policy applicable to, Personal Information.
- **Other purposes.** To carry out other legitimate business purposes, as well as other lawful purposes about which we will notify you.

How we protect your information

We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorised access, alteration, disclosure or destruction of your personal information, username, password, and data stored on our Sites.

Sensitive and private data exchange between the Sites and their Users happens over a SSL secured communication channel and is encrypted and protected with digital signatures. WWOOF Australia does not hold any credit card information.

WWOOF Australia uses the Australian Governments reasonable steps to securing your privacy and your data. WWOOF Australia has a staff member assigned to regularly review their practices and to ensure WWOOF Australia remains compliant and up-to-date with new regulations or practices.

WWOOF Australia also follows the guidelines for a Data Breach - of which we will inform those affected and the OAIC. See recommendations here: <https://www.oaic.gov.au/agencies-and-organisations/guides/data-breach-notification-aguide-to-handling-personal-information-security-breaches>

Data Breach can be an external threat such as hacking, or an internal issue such as the incorrect information being sent to someone who should not receive it, or a staff member viewing information of which they have no role in doing so.

All suspected security issues can be emailed to wwoof@wwoof.com.au and the relevant staff member will attend to it immediately.

WWOOF Australia follows these guidelines here:
<http://www.icb.org.au/out/?dlid=38158> in securing your data.

Your privacy preferences

Privacy Options: You can change your privacy settings in your WWOOF Profile and set the information you share with others by logging into your profile and selecting whether your information is viewable by other Members, All Public or only yourself.

C. Cookies and Tracking Technologies

We and our partners may use various technologies to collect and store information when you use our Services, and this may include using cookies and similar tracking technologies, such as pixels. Our use of cookies and other tracking technologies is discussed in more detail in our Cookie Statement.

D. Other Data Protection Rights

You may have the following data protection rights:

- **To access, correct, update or request deletion** of Personal Information. WWOOF Pty Ltd takes reasonable steps to ensure that the data we collect is reliable for its intended use, accurate, complete and up to date. As a Member, you can manage many of your individual account and profile settings within your profile provided through the WWOOF Pty Ltd platform, or you may contact us directly by emailing us at wwoof@wwoof.com.au
- In addition, individuals who are residents of the EEA can **object to processing** of their Personal Information, ask to **restrict processing** of their Personal Information or **request portability** of their Personal Information. You can exercise these rights by contacting us using the contact details provided in the "Questions and Concerns" section below.
- Similarly, if Personal Information is collected or processed on the basis of consent, the data subject can **withdraw their consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Information conducted in reliance on lawful processing grounds other than consent.
- The **right to complain to a data protection authority** about the collection and use of Personal Information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the EEA are available [here](#).

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection law. We may ask you to verify your identity in order to help us respond efficiently to your request.

A. How We Share Information

We may share and disclose your Personal Information to the following types of third parties for the purposes described in this privacy policy (**for purposes of this section, "you" and "your" refer to Members, Users, Contacts and Visitors unless otherwise indicated**):

(i) **Other WWOOF Members:** In order for the WWOOF Program to effectively connect volunteers with WWOOF Hosts, the information that you agree can be shared with other members will be visible to all current registered WWOOF members. Expired members will only be able to view information that you have set to be Publicly visible. Member contact details are not publicly visible by default.

(ii) **Advertising partners:** We may partner with third-party advertising networks and exchanges to display advertising on our Websites or to manage and serve our advertising on other sites and may share Personal Information or photographs with them for this purpose. WWOOF Pty Ltd retains ownership of the Content and Photo's that you upload to our website wwoof.com.au

We and our third-party partners may use cookies and other tracking technologies, such as pixels and web beacons, to gather information about your activities on our Websites and other sites in order to provide you with targeted advertising based on your browsing activities and interests. For more information about cookies and other tracking technologies, please see our Cookie Statement.

(iii) **Any competent law enforcement body, regulatory body, government agency, court or other third party** where we believe disclosure is necessary (a) as a matter of applicable law or regulation, (b) to exercise, establish, or defend our legal rights, or (c) to protect your vital interests or those of any other person.

(iv) **A potential buyer (and its agents and advisors)** in the case of a sale, merger, consolidation, liquidation, reorganization, or acquisition.

In that event, any acquirer will be subject to our obligations under this privacy policy, including your rights to access and choice. We will notify you of the change either by sending you an email or posting a notice on our Website.

(v) **Any other person with your consent.**

B. Legal Basis for Processing Personal Information (EEA Persons Only)

If you are from the European Economic Area, our legal basis for collecting and using the Personal Information described above will depend on the Personal Information concerned and the specific context in which we collect it.

However, we will normally collect and use Personal Information from you where the processing is in our **legitimate interests** and not overridden by your data-protection interests or fundamental rights and freedoms. Typically, our legitimate interests include improving, maintaining, providing, and enhancing our technology, products, and services; ensuring the security of the Services and our Websites; and for our marketing activities.

If you are a Member, we may need the Personal Information to **perform a contract** with you. In some limited cases, we may also have a **legal obligation** to collect Personal Information from you.

If we ask you to provide Personal Information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your Personal Information is mandatory or not, as well as of the possible consequences if you do not provide your Personal Information.

Where required by law, we will collect Personal Information only where we have your **consent** to do so.

If you have questions about or need further information concerning the legal basis on which we collect and use your Personal Information, please contact us using the contact details provided in the "Questions and Concerns" section below.

C. Your Choices and Opt-Outs

Members and Visitors who have opted in to our marketing emails can opt out of receiving marketing emails from us at any time by clicking the "unsubscribe" link at the bottom of our marketing messages.

Also, all opt-out requests can be made by emailing us using the contact details provided in the "Questions and Concerns" section below. Please note that some communications (such as service messages, account notifications, billing information) are considered transactional and necessary for account management, and Members cannot opt out of these messages unless you cancel your WWOOF Pty Ltd account.

D. Our Security

We take appropriate and reasonable technical and organizational measures to protect Personal Information from loss, misuse, unauthorized access, disclosure, alteration, and destruction, taking into account the risks involved in the processing and the nature of the Personal Information. If you have any questions about the security of your Personal Information, you may contact us at wwoof@wwoof.com.au.

WWOOF Pty Ltd accounts require a username and password to log in. Members must keep their username and password secure, and never disclose it to a third party.

Because the information in a Member's WWOOF Pty Ltd account is so sensitive, account passwords are hashed, which means we cannot see a Member's password. We cannot resend forgotten passwords either. We will only provide Members with instructions on how to reset them.

E. International Transfers

(i) We operate in the Australia

Our servers and our office are located in Australia. While the data protection, privacy, and other laws of Australia might not be as comprehensive as those in your country, we take many steps to protect your privacy.

(ii) Members located in Australia

If you are a Member who lives in Australia, this section applies to you. We are subject to the operation of the Privacy Act 1988 ("**Australian Privacy Act**"). Here are the specific points you should be aware of:

- Where we say we assume an obligation about Personal Information, we are also requiring our subcontractors to undertake a similar obligation, where relevant.
- We will not use or disclose Personal Information for the purpose of our direct marketing to you unless you have consented to receive direct marketing; you would reasonably expect us to use your personal details for the marketing; or we believe you may be interested in the material but it is impractical for us to obtain your consent. You may opt out of any marketing materials we send to you through an unsubscribe mechanism or by contacting us directly. If you have requested not to receive further direct marketing messages, we may continue to provide you with messages that are not regarded as "direct marketing" under the Australian Privacy Act, including changes to our terms, system alerts, and other information related to your account.

- Our servers are located in Sydney, Australia. In addition, we or our subcontractors may use cloud technology to store or process Personal Information, which may result in storage of data outside Australia. It is not practicable for us to specify in advance which country will have jurisdiction over this type of offshore activity. All of our subcontractors, however, are required to comply with the Australian Privacy Act in relation to the transfer or storage of Personal Information overseas.
- If you think the information we hold about you is inaccurate, out of date, incomplete, irrelevant, or misleading, we will take reasonable steps, consistent with our obligations under the Australian Privacy Act, to correct that information upon your request.
- If you are unsatisfied with our response to a privacy matter then you may consult either an independent advisor or contact the Office of the Australian Information Commissioner for additional help. We will provide our full cooperation if you pursue this course of action.

F. Retention of Data

We retain Personal Information where we have an ongoing legitimate business or legal need to do so. Our retention periods will vary depending on the type of data involved, but, generally, we'll refer to these criteria in order to determine retention period:

- Whether we have a legal or contractual need to retain the data.
- Whether the data is necessary to provide our Services.
- Whether our Members have the ability to access and delete the data within their WWOOF Pty Ltd accounts.
- Whether our Members would reasonably expect that we would retain the data until they remove it or until their WWOOF Pty Ltd accounts are closed or terminated.

When we have no ongoing legitimate business need to process your Personal Information, we will either delete or anonymize it or, if this is not possible (for example, because your Personal Information has been stored in backup archives), then we will securely store your Personal Information and isolate it from any further processing until deletion is possible.

G. Privacy

WWOOF members have the right to request in writing from businesses with whom they have an established business relationship, (a) a list of the categories of Personal Information, such as name, email, and mailing address, and the type of services provided to the customer that a business has disclosed to third parties (including affiliates that are separate legal entities) during the immediately preceding calendar year for the third-parties' direct marketing purposes, and (b) the names and addresses of all such third parties. To request the above information, please email us at wwoof@wwoof.com.au

H. Changes to this Policy

We may change this privacy policy at any time and from time to time. The most recent version of the privacy policy is reflected by the version date located at the top of this privacy policy. All updates and amendments are effective immediately upon notice, which we may give by any means, including, but not limited to, by posting a revised version of this privacy policy or other notice on the Websites. We encourage you to review this privacy policy often to stay informed of changes that may affect you. Our electronically or otherwise properly stored copies of this privacy policy are each

deemed to be the true, complete, valid, authentic, and enforceable copy of the version of this privacy policy that was in effect on each respective date you visited the Website.

I. Questions & Concerns

If you have any questions or comments, or if you have a concern about the way in which we have handled any privacy matter, please email us to send us a message. You may also contact us by postal mail or email at:

For EEA Residents:

For the purposes of EU data protection legislation, WWOOF Pty Ltd is the controller of your Personal Information. Our Data Protection Officer can be contacted at

wwoof@wwoof.com.au

For Non-EEA Residents:

WWOOF Pty Ltd

Attn. Privacy Officer

wwoof@wwoof.com.au

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