Compliance with Privacy Obligations

This Privacy Statement sets out the policy of Capat Investments Pty Ltd trading as Benefitness & Health Centre and Pilates 341 with respect to the way in which we collect, use, disclose, store, secure and dispose of Personal Information about our customers, and employees including through our website at www.benefitness.com.au and www.pilates341.com.au

Benefitness and Health Centre is bound by the National Privacy Principles set out in Schedule 3 of the Privacy Amendment (Private Sector) Act 2000 ("the Act"). A copy of the National Privacy Principles may be obtained from the website of The Office of the Federal Privacy Commissioner at www.privacy.gov.au

Benefitness and Health Centre is dedicated to ensuring that personal and sensitive information is gathered with respect to the individual and aims to exercise the highest standard of care in preserving privacy of information in all areas of operation.

The information about individual health collected by Benefitness and Health Centre is handled in compliance with applicable State and Territory health records legislation.

Collection of Personal and Sensitive Information

For the purposes of this Statement, "Personal Information" is characterised as being information or an opinion about an individual whose identity is apparent or can reasonably be ascertained from that information or opinion. "Sensitive information" means health information about an individual.

The types of Personal Information generally collected by us include name, address, date of birth, mobile and telephone numbers, e-mail address, credit card or bank account details and emergency contact details. Personal Information is also collected when individuals provide business cards or other documentation to us containing such Personal Information, including completion of a Membership Contract and/or Direct

Debit Request Form and a Pre Exercise Health Questionnaire. Personal Information also includes information we collect in the course of providing services to individuals and external communications.

The types of Sensitive Information generally collected by us include information relating to health issues that is necessary to properly advise customers about fitness training. The types of health related information include medical history, whether individuals are using medication, smoke or are pregnant and other health related information. We will obtain specific consent in circumstances where it is necessary to collect sensitive information.

Use of Personal and Sensitive Information

Any Personal or Sensitive Information that we collect about individuals will be used and disclosed by us to provide the services required or otherwise to enable us to carry out our functions.

Benefitness and Health Centre will disclose Personal Information to third party business partners including PerfectGym, Worldpay for Platforms, Glofox and MyWellness/Technogym Australia for the purpose of providing technology based applications and when they provide services to Benefitness and Health Centre that are consistent with the terms of our Privacy Policy. When we outsource or contract out specific support services, our contractors may access individuals' Personal Information. It is important to note that all our contractors are subject to strict confidentiality obligations. We take great pride in operating only with reputable business partners.

Personal or Sensitive Information that is in our possession is not a subject to rent, sale or any other disclosure to any other company or organisation, without prior consent of individuals where that consent is required by law. Individuals consent to our use and disclosure of their Personal Information where it is incidental to a sale of our business to a third party.

Benefitness and Health Centre will disclose personal information if it is under a legal requirement to do so (for example, under a court order, or if required under legislation), or if an authorised request is made from a law enforcement agency.

Otherwise, we will only disclose Personal Information with the consent of the relevant individuals. If consent is obtained, we may provide Personal Information to Benefitness & Health Centre's personal trainers to assist customers to improve their fitness and well being, in addition, trainers can advise customers which fitness programs are suitable for them. If personal trainers are contractors (rather employees), their contracts with us require them to keep Personal Information confidential.

Information provided by employees

Any employment application provided to the Company will be used solely for the purpose of analysing suitability for a position available. Personal details will only form part of an employee record if application is successful. The information about employees will only be disclosed by Benefitness and Health Centre if required by law to authorised government agencies i.e. Australian Taxation Office or as otherwise directed by employee.

Any unsuccessful applications will remain on file to be revisited should suitable opportunities arise in the future and if required by the applicant applications may be returned or destroyed.

Website/online privacy

The Privacy Policy outlines our approach to online privacy issues regarding Personal Information collected through our website: https://www.benefitness.com.au and www.pilates341.com.au

Benefitness and Health Centre will handle personal information collected online with the utmost care, and will not knowingly use it in ways not explicitly consented to by the user who supplied the information and to whom the information refers.

Benefitness and Health Centre will handle Personal Information collected online consistently with the way that it handles Personal Information collected offline. Other matters specific to our handling of Personal Information online are set out below.

a) Cookies

No Personal Information is collected by Benefitness and Health Centre when individuals visit our website, unless they chose to provide it to us (for example, by sending us emails through our website). However, we may collect certain data that does not identify individuals (sometimes called “web log information”) when they visit certain pages (such as the type of browser and operating system they have). We may also use “cookies” which are small files that are stored on computer and that manage the security and navigation process of the site. Users can choose to block these cookies but some portions of the site may not function correctly if they do. This type of data is collected for statistical purposes only, and while cookies will identify a computer, they are unlikely to identify users personally.

b) Email/SMS marketing

We will not distribute our marketing material via SMS unless customers have consented to this. This is a requirement of the Spam Act 2003. Further, customers can unsubscribe from our e-newsletter or other bulletins by using the “unsubscribe” facility contained in each electronic publication we send. Occasionally, Benefitness and Health Centre will send promotional email messages to prospective customers to market a service or activity. This will only be done on the reasonable belief that customers would be interested in the subject matter. In every case customers will be provided with clear and simple instructions on how to be removed from our mailing list.

c) Site security policy

Benefitness and Health Centre places great importance on the security of all information associated with our customers. Our security and privacy policy are continually reviewed and updated, the user information is accessed by authorised personnel. We aim to

prevent accidental manipulation, destruction, use, disclosure loss or unauthorised access of data.

d) Hyperlinks to other websites
Our web site may contain links to other web sites which we do not control; they are not covered by our Privacy Policy. If users access other websites using the links provided, operators may collect information from users and use it in accordance with their privacy policy, which may differ from ours. We have no control over the types of information the site owners choose to collect and how they use it.

e) Social Networking Acceptable Use Policy
Benefitness and Health Centre encourages all comments on any of our social networking pages (Facebook, Instagram), as we would like to hear from our clients, friends and staff. Customer views, news, ideas, insights and criticisms about Benefitness and Health Centre are very important to us, yet the social networking sites must not be used to abuse others, expose others to offensive or inappropriate content, or for any illegal purpose.

It is the user's responsibility to protect their personal privacy when using our social networking pages. We advise users not to include any Personal Information of either themselves or of others in their posts to the wall (such as email addresses, private addresses or phone numbers).

In addition, it is recommended to refrain from posting materials to the page that infringe the intellectual property rights of others and not to include internet addresses or links to websites, or any email addresses in posts to the wall.

Any information posted to Benefitness and Health Centre & Pilates 341 Social Networking pages (Facebook & Instagram) is recorded and used for the purpose of administering pages and addressing any comments made, while no attempt will be made to identify users except where authorised by law.

We are not responsible for the privacy practices or content of social networking pages (Facebook, You Tube or Instagram). The responsibility of Benefitness and Health

Centre is limited to our own postings made on our Facebook page “ Benefitness & Health Centre” and “Pilates 341”.

Security

We use all reasonable endeavours to secure any Personal or Sensitive Information that we hold and aim to keep this information accurate and up-to-date. Technical and organisational security measures are in place to ensure the security of information and to protect it against deliberate or accidental manipulation, destruction, use, disclosure loss or unauthorised access.

Personal and Sensitive Information is stored behind industry standard firewalls and where applicable, protected by user names and passwords. Where appropriate, Personal and Sensitive Information is kept within a locked storage room.

Changes to Privacy Statement

Benefitness and Health Centre reserves the right to change this Privacy Statement without prior notice. Any changes to Privacy Statement will be posted on the Benefitness and Health Centre website. In order to remain updated and informed on protection of Personal and Sensitive Information, we encourage users to review this Statement. If, at any time, you have questions, comments or concerns about our privacy commitment please contact us.

Access and correction of your Personal Information

The access to Personal Information that we and/or contractors hold can be obtained on request. It is at the discretion of Benefitness and Health Centre to provide this information to individuals, depending upon legal circumstances. Users are entitled to tell

us if they do not wish us to hold their information, we will remove all such information from our database. Individuals also have the right to ask us to correct information about them which is inaccurate, incomplete or out of date.

If you wish to seek access to or correction of personal information that Benefitness and Health Centre holds about you, please contact us at sales@benefitness.com.au. We may ask you to put your request in writing. It is important to us that the Personal Information we hold about you is accurate, complete and up to date.

Contact details

- By letter: Benefitness and Health Centre, 341 Hancock Road, Fairview Park SA 5126 or PO Box 71, Greenwith SA 5125.
- By telephone: 08 8251 3011; or
- By email to sales@benefitness.com.au.

This Privacy Statement applies to Benefitness and Health Centre, its employees and contractors.

Complaints

If you have a complaint about the way we have dealt with your Personal Information, please contact us at the above telephone number, email or address.

We will make all reasonable attempts to respond to your complaints or requests.

CCTV Cameras and Surveillance

We undertake an ongoing video recording in Benefitness and Health Centre for the purpose of ensuring security via CCTV cameras, recording the time and date at which images are taken.

Video recordings can be accessed only by authorised staff.

Video recordings of a specific incident may be released to the SA Police Service only under the terms of this policy or subject to the execution of a search warrant or other legal process and only with the approval of Benefitness and Health Centre.

This Privacy Statement contains specific provisions applicable to users using services in or accessing our Site or Apps from Australia.