

Protecteur Privacy Policy: Our commitment to you

Your privacy is important to us.

Major League Systems Pty Ltd, ACN 621 664 113, trading as Buncheur (referred to as **Buncheur, us, we or our**) is committed to protecting the privacy of your personal information, respecting your rights to privacy and complying with the Privacy Act 1988 (Cth) (**Privacy Act**).

This Privacy Policy details how we comply with our privacy obligations in respect of personal information that you submit to us via the Protecteur/Advocacy Report page of our website, which is available when you log into your Buncheur Account at <https://www.buncheur.com/protecteur>. That page is referred to in this Privacy Policy as the **Protecteur Page** and the personal information that you submit via that Protecteur Page is referred to as the **Protecteur Information**.

Please read this Privacy Policy carefully. Your access to and use of the Protecteur Page is subject to this Privacy Policy. By submitting personal information via the Protecteur Page, you agree to this Privacy Policy. You may not submit personal information via the Protecteur Page if you do not agree to this Privacy Policy.

You may not use the Protecteur Page on an anonymous basis or using a pseudonym as the Protecteur Information will be linked to your Account.

Please note that this Privacy Policy does not apply in relation to any personal information that we collect about you other than the Protecteur Information. We have a separate privacy policy which details how we comply with our privacy obligations in relation to all other personal information that we collect about you. That separate privacy policy is available here: <https://www.buncheur.com/privacy>.

1. What is the Protecteur Page?

Buncheur collects information, including the Protecteur Information, via the Protecteur Page for the purposes of use in compiling and publishing statistics regarding the occurrence of road incidents in Australia involving bicycles and the number of penalty notices issued by Australian police forces in connection with such road incidents. Buncheur will not publish the Protecteur Information in full however Buncheur does not warrant that the Protecteur Information will be anonymised when it is used in published statistics.

2. What is personal information?

When used in this Privacy Policy, the term “personal information” has the meaning given to it in the Privacy Act. Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether or not it is recorded in material form. Personal information covers a broad range of information.

3. What personal information do we collect and hold?

The Protecteur Information will consist of:

- (a) your name;
- (b) details of traffic incidents that you have been involved in, including where you were riding, the time and location of the incident and the details of any police report you have made of any traffic incident; and

(c) details of any injury you may have suffered as a result of a traffic incident.

4. How do we collect the Protecteur Information?

We will only collect the Protecteur Information directly from you when you submit that information via the Protecteur Page.

5. For what purposes do we collect, hold, use and disclose the Protecteur Information?

We collect, hold, use and disclose the Protecteur Information only for the purposes set out in clause 1 of this Privacy Policy.

6. Do we disclose Protecteur Information to anyone outside Australia?

We may disclose the Protecteur Information to our related bodies corporate, customers and third party service providers, suppliers and other contractual counterparties, in any case, located overseas for the purpose set out in clause 1 of this Privacy Policy. The jurisdictions in which these entities may be located include New Zealand, the United States of America, the United Kingdom and Canada.

7. How can I access or change Protecteur Information?

The Protecteur Information is available in your Account.

If you believe that any of the Protecteur Information is incorrect, incomplete or inaccurate, you should update this as provided for via the Protecteur Page. If you are unable to update the Protecteur Information via the Protecteur Page, you may request us to amend it by contacting our Privacy Officer (see details below). Following receipt of such a request, we will correct the Protecteur Information if we determine this is required.

We will not charge you for making any corrections to the Protecteur Information as contemplated in this clause 7.

8. Holding Protecteur Information and security

We take reasonable steps to ensure the Protecteur Information is protected from misuse, interference and loss and from unauthorised access, modification or disclosure.

As the Buncheur website, and therefore the Protecteur Page, 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 cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any information which you transmit to us online is transmitted at your own risk.

Only our authorised personnel will be provided with access to the Protecteur Information. These personnel are required to treat this information as confidential and deal with it in accordance with this Privacy Policy.

Protecteur Information is destroyed or de-identified when no longer needed by us.

If any of the Protecteur Information has been lost or subjected to unauthorised access, use, interference, modification, disclosure or other misuse (**Data Breach**), Buncheur will take all steps in relation to the Data Breach that are required by the Privacy Act.

9. Contact our Privacy Officer

If you have any questions in relation to the Protecteur Information or this Privacy Policy or any concerns or a complaint regarding the treatment of the Protecteur Information by us, please e-mail our Privacy Officer at support@buncheur.com or call our Privacy Officer on 0411 445 375. We will treat your request or complaint confidentially. Our Privacy Officer will contact you within a reasonable time after receipt of your request or complaint to discuss your concerns and to outline options regarding how they may be resolved.

If you have a complaint regarding the treatment of the Protecteur Information by Buncheur that is not resolved by our Privacy Officer, you may be able to make a complaint to the Office of the Australian Information Commissioner, see <https://www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint>.

10. Changes to our Privacy Policy

We may change this Privacy Policy from time to time and all Protecteur Information will be governed by the most recent version of this Privacy Policy. The most up to date version of this Privacy Policy is available on the Protecteur Page.

11. General Privacy Information

General information about privacy and your privacy rights may be found on the website of the Office of the Australian Information Commissioner here: <http://www.oaic.gov.au/>.