

1. Lite n' Easy Privacy Policy

- 1.1 Lite n' Easy Pty Ltd ACN 010 655 820 and its related bodies corporate (as that term is defined in section 50 of the *Corporations Act 2001* (Cth)) ("**Lite n' Easy**", "**we**", "**our**", and "**us**") are committed to both protecting and respecting your privacy, and to complying with our obligations under the *Privacy Act 1988* (Cth) (**Act**).
- 1.2 We are dedicated to honouring the trust that our customers, business service providers, and members of the general public (referred to as "you" or "your" in this Privacy Policy) have placed in us for the last three decades, and will treat your personal information confidentially and in accordance with the Act, which includes the Australian Privacy Principles (**APPs**).
- 1.3 This Privacy Policy complies with the Act and the APPs, and details how we collect, use, store and disclose the Personal Information (as defined below) that you provide to Lite n' Easy during your online and offline interactions and dealings with us, including:
 - (a) the kinds of personal information we collect and hold;
 - (b) how we collect and hold your personal information;
 - (c) the purposes for which we collect, hold, use and disclose your personal information;
 - (d) how you can access and correct your personal information which we hold; and
 - (e) how you can complain about a breach of the APPs and how we will deal with such a complaint.
- 1.4 Personal information is defined under the Act as information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable ("**Personal Information**").
- 1.5 Personal Information also includes sensitive information, which is also defined under the Act and includes health information, and information or an opinion about an individual's racial or ethnic origin, political opinions and memberships, religious beliefs or affiliations, sexual orientation or practices, or criminal record ("**Sensitive Information**").
- 1.6 Health information is defined under the Act to include information or an opinion about the health of an individual, including information relating to future or actual provision of health services (**Health Information**).
- 1.7 Personal Information which is Sensitive Information attracts a higher privacy standard under the Act and applicable State and Territory legislation and is subject to additional mechanisms for your protection.
- 1.8 We may amend this Privacy Policy from time to time. The latest version of our Privacy Policy will always be available on the Lite n' Easy website. Please refer back to our online Privacy Policy on a regular basis to ensure you are up to date. By

providing us with information, through your interactions and dealings with us both online and offline, you agree to the terms of this Privacy Policy as updated.

- 1.9 If you do not agree to provide us with some or all of your Personal Information, or you do not consent to the terms of this Privacy Policy, we may not be able to provide you with our products or services, or engage with you as part of our business and operations.
- 1.10 This Privacy Policy does not create or confer upon any individual any rights, or impose upon Lite n' Easy rights or obligations outside of, or in addition to, those imposed by the Act.

2. Personal Information that Lite n' Easy collects

- 2.1 The kinds of Personal Information that we collect about you depends on the circumstances of our interaction with you.
- 2.2 For our customers, prospective customers and the general public, we may collect the following categories of Personal Information from or about you:
 - (a) name;
 - (b) street address;
 - (c) email address;
 - (d) contact telephone number(s);
 - (e) delivery instructions;
 - (f) payment details such as credit card information;
 - (g) date of birth or age;
 - (h) gender;
 - (i) your meal plan or weight loss goals, how much weight you want to lose, your exercise regime, or your sentiments and achievements regarding weight loss,
 - (j) Health Information, including height, weight, waist circumference information and other health information we are provided with or we collect if it is relevant to our provision of goods or services to you;
 - (k) any information you provide by filling in forms on our website or app(s);
 - (l) details of transactions you carry out with us, including through our website, and of the fulfilment of your orders;
 - (m) any enquiries, feedback or customer survey responses relating to your use of a Lite n' Easy product or service;
 - (n) information you provide through your use of our website or app(s), such as your IP address and other common web log information, device ID, device

type, geolocation information, traffic referrer information and statistics, and any other information contained in cookies; and

- (o) any other Personal Information that may be required in order to facilitate your dealings with us.

2.3 For business services providers or suppliers, in the context of our business relationship with you, we may collect your name, business name, ABN, ACN, contact details such as physical address(es), email address(es) and telephone number(s), signature, and bank account details for payment purposes.

3. How your Personal Information is collected

3.1 We will usually collect Personal Information directly from individuals in a variety of different ways, both in an online and offline context, and only to the extent necessary to provide you with our products or services and carry out our operations. Sometimes we may need to collect information about individuals from a third party; however, we will only do this where it is not reasonable or practical for us to collect this information directly from individuals. Further details about how we collect Personal Information are provided below.

3.2 We may collect Personal Information directly from you when you:

- (a) interact with and use our websites, app(s), services, content and advertising;
- (b) register an account on our website or app(s);
- (c) share your Lite n' Easy success story or submit a form on our website or app(s);
- (d) purchase a product from us;
- (e) communicate with us through correspondence via phone, live chat, email, or when you share information with us through social media and review services, our website(s) or app(s);
- (f) respond to surveys; and
- (g) have contact with us in person (including agents or contractors to Lite n' Easy such as delivery drivers).

3.3 If we receive Personal Information about you that we have not requested, and we would not be able to collect this information under the APPs if we had requested it, then we will destroy or de-identify the information where lawful and reasonable to do so.

3.4 Personal Information that we collect is held in different formats, including physical paper copy and electronic records, and may be stored on secure servers located in Australia or outside of Australia.

4. Purposes for which we use or disclose your Personal Information

4.1 We only use or disclose your Personal Information for the purpose that it was collected (**Primary Purpose**), unless:

- (a) you have expressly or impliedly consented to the use or disclosure of the information, including under this Privacy Policy;
- (b) the secondary use or disclosure (**Secondary Purpose**) is related (or for Sensitive Information, directly related) to the Primary Purpose; or
- (c) the use or disclosure is otherwise required or permitted by law.

4.2 Primary Purposes for which we may use or disclose your Personal Information include

- (a) to facilitate your access to our website, services, app(s), etc;
- (b) to deliver our products and services to you, as well as troubleshooting and making improvements to our service;
- (c) to customise our service for you, such as making a meal plan recommendation based on the goal or objective you provide;
- (d) to measure and analyse the performance of our website, app(s), and other services such as advertising and marketing;
- (e) to send you marketing and promotional messages, including new products, promotions, and relevant information which we think you will find valuable, which you may opt out of at any time. For more information please refer to our "Cookie choices and Opt-out" section below;
- (f) to facilitate surveys, contests, rewards, or other promotional activities or events sponsored or managed by us;
- (g) to undertake research (i.e. market research or health and weight-loss services and products research, the results of which may be published but without your Personal Information (except with your prior consent)); and
- (h) to investigate your feedback or complaint regarding our products and services.

4.3 For business services providers or suppliers, the Primary Purposes for which we may use or disclose your Personal Information also include:

- (a) to administer and manage your engagement with the Company as our business service provider or supplier;
- (b) to facilitate and monitor your performance as our business service provider or supplier, including your compliance in relation to our company policies and contractual obligations; and
- (c) to ensure we hold your relevant and up to date contact information.

5. Disclosure to third parties

- 5.1 We may disclose relevant Personal Information to trusted third party partners when necessary to enable us to provide our services to you and carry out our operations. For example, your delivery details will be shared with our contracted delivery drivers. We may also disclose your Personal Information to a third party who holds other information about you, who may then combine that information in order to develop aggregated and anonymised insights on our behalf. This allows us to better personalise your Lite n' Easy experience and improve the products and services that you receive.
- 5.2 We do not share your Personal Information with third parties, unless the disclosure is:
- (a) for a Primary Purpose or Secondary Purpose, or otherwise required or permitted by law;
 - (b) pursuant to your specific request and/or permission;
 - (c) to affiliated companies, related bodies corporate or related entities (as defined under the *Corporations Act 2001 (Cth)*), and/or potential or actual investors or purchasers, of Lite n' Easy, or its business or assets or part thereof (in any form of business transaction, including initial public offering, share purchase, merger, or asset or trade sale) pursuant to an agreement which contains reasonable confidentiality arrangements;
 - (d) with business services providers or suppliers who work with us pursuant to an agreement which contains reasonable confidentiality arrangements;
 - (e) in compliance or accordance with any applicable law and/or court orders and/or in order to prevent suspected illegal acts, frauds, situations involving potential threats to the safety of any person, or as otherwise required by law. This includes responding to lawful requests by public authorities, including to meet national security or law enforcement requirements;
 - (f) for the purposes of assisting Lite n' Easy to defend against claims, in investigations (including regulatory investigations) and/or to establish or exercise any legal right that we may have;
 - (g) to our insurer(s) in relation to any insurance policy or claim that we may have; or
 - (h) for the purposes of assisting Lite n' Easy to prevent violations of this Privacy Policy or otherwise protect the rights, property, or safety of Lite n' Easy prospective, current and former employees, independent contractors (or their employees), business service providers and suppliers, and other persons, including exchanging information with third parties for fraud protection and credit risk reduction.

6. Security of data

- 6.1 Lite n' Easy takes reasonable technical and organisational measures in accordance with applicable laws to safeguard your Personal Information. This includes the use

of Firewalls and when purchasing from Lite n' Easy your financial details are passed through a secure server using industry standard SSL encryption technology. While we strive to protect your Personal Information, we cannot guarantee the security of any Personal Information that you disclose online and therefore you disclose such Personal Information at your own risk.

7. Website, cookie choices and opt-out

- 7.1 When you access Lite n' Easy's website, we collect your site usage data through the use of technologies such as internet cookies. Cookies are small files which store data on your device regarding your usage of sites (including unrelated sites that you have historically visited) to enable websites to operate optimally. These cookies ensure we serve the correct page to you and improve your website experience. This information may also be collected and used, when aggregated and anonymised, to help us understand site usage and user behaviour on our website or app(s), and to allow us to improve our website, app(s) and services.
- 7.2 When you click a link to or on our website or app(s), you furnish us with the IP address of your device so that we can deliver content to you. Furthermore, if you place an order online using a credit card, we specifically record your IP address with the use of the credit card as part of our fraud prevention measures.
- 7.3 We are not responsible for the privacy of any information you reveal or post in any public forum, including on websites and social media, or for the privacy practices of such forums operated or owned by third parties.
- 7.4 Furthermore, our website may contain links to other third party sites, such as Facebook or Instagram. Whilst we take reasonable steps to ensure this is always clear, we do not take responsibility for any collection or use of personal information if you choose to click on these links, and you should refer to the privacy policies of the relevant third party in this regard.
- 7.5 If you no longer wish to receive some or all of the communications we regularly send to our customers (such as newsletters, product information and specials), you may request at any time to have your preferences updated. To change your preferences simply click the 'Unsubscribe' link at the bottom of a Lite n' Easy email or contact us by phone on 13 15 12 or email at privacy@liteneasy.com.au.

8. Access or correction of data

- 8.1 You may request to access or have corrections made to the Personal Information we hold about you, simply by writing to us, phoning us on 13 15 12 or emailing us at privacy@liteneasy.com.au. This right is subject to certain exceptions allowed by law.
- 8.2 Lite n' Easy will allow access or make the requested corrections unless there is a reason under the Act or other relevant law to refuse such access or refuse to make the requested correction. If we refuse to provide you with access to the information requested, or to correct your Personal Information, we will tell you in writing why your request was refused and how you can complain about the refusal. Lite n' Easy may require you to provide some form of identification to verify that you are the person to whom the requested information relates.

8.3 If we do correct your Personal Information and we have previously disclosed your Personal Information to a third party, upon your request, we will notify that third party of the correction where practicable.

9. Contact information and complaint handling

9.1 If you have any additional questions, comments or concerns about our Privacy Policy or any other privacy or security issues, please contact our Privacy Officer at privacy@liteneasy.com.au.

9.2 You may use the above contact details to make a complaint or to get in touch with us for any other reason relating to this Privacy Policy.

9.3 Upon receipt of any complaint, comment, concern or query, as soon as reasonably practicable, we will endeavour to:

- (a) provide an initial response, outlining any next steps, including any investigation, that may be undertaken in response; and
- (b) undertake those steps and attempt to resolve your complaint, comment, concern or query.

9.4 If we are not able to resolve your complaint, you may also refer your complaint to the Office of the Australian Information Commissioner.

This Privacy Policy was last updated: **5 July 2021**.