

Crafte – Privacy Policy

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Last Updated: 24 Jan 25

1. About this privacy policy

- a. LightBulb Solutions Pty Ltd (trading as ‘Crafte’) (ABN 32 630 439 557) (‘Crafte’, ‘we’, ‘us’, or ‘our’) owns and operates the internet-based platform and app known as “Crafte” (Platform).
- b. We’re committed to protecting the privacy of individuals who interact with us and our products and services, in line with our obligations under the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) (Privacy Act).
- c. This policy explains the type of personal information we might collect, how we handle and store it, who we share it with, how you can access and correct it, and how you can get in touch if you have any concerns. It applies to you if you are:
 - i. a product vendor, retailer or other type of merchant who is a client or potential client of Crafte including any of its employees or representatives that deal with us (Merchant);
 - ii. an individual customer or potential Customer of Merchants who accesses or uses our Platform (or contacts us in relation to the Platform) (Consumer);
 - iii. a visitor to our website (Website Visitor); or
 - iv. a contractor, supplier, potential employee or any other individual we may deal with in the course of running our business and providing our services.
- d. We may need to amend this policy from time to time. Please review it regularly to ensure that you are up to date with any changes. If we make material changes to this policy, we will notify you by email or through a prominent notice on our Platform before the changes take effect.

2. The type of personal information we collect

- a. We will collect only the personal information necessary to provide our services and will ensure this data is used only for the purposes outlined in this policy. The type of personal information we collect ultimately depends on the nature of our relationship with you:

Merchant

- b. If you are a Merchant, we might collect:
 - i. your name and contact details (such as email address, phone number, fax number, and business and postal addresses);
 - ii. information about your account and agreement with us, your Platform usage, location information, sales information and stock levels;
 - iii. details of any communications or interactions you have with us, or that you may have with a Consumer via the Platform; and
 - iv. financial information such as your bank or credit card details used to transact with us, or other financial information that allows us to transact with you or provide you with our services.

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Consumer

- c. If you are a Consumer, we might collect:
- i. your name and contact details (such as email address, phone number, fax number, and residential and postal addresses);
 - ii. your age and gender;
 - iii. financial information such as any bank or credit card details used to facilitate purchases via the Platform (though these are held by a Level 1 PCI Service Provider to ensure they are kept safe. We don't see your full credit card number, nor do we store or transmit it);
 - iv. your login details for the Platform, and details of your use of, or access to, the Platform;
 - v. details of any communications or interactions you have with a Merchant using the Platform – for example, details of an order or enquiry;
 - vi. your product purchase history, including purchases made via the Platform and prior purchases from Merchant Productries (including your name, email address, telephone number, shipping address, purchase history, taste preferences, visitation history, credit balances and notes), which may include purchases made from a productry, product vendor or merchant before they became a client of Crafte;
 - vii. any information that a Merchant stores on the Platform about you and your dealings with them; and
 - viii. details of any communications we have with you, including but not limited to any content you publish on the Platform.

Website visitors

- d. If you access our website, we might collect:
- i. your name, contact details, and any communications we have with you if you contact us or request a demo of the Platform; and
 - ii. your preferences and data that we capture from cookies.

Other individuals else we deal with in running our business

- e. Information that we might collect if you, for example, do business with us or apply for a role in our team can include:
- i. your name and contact details (such as email address, phone number or residential address);
 - ii. details of any communications we have with you; or
 - iii. information about you that you (or someone else) give us, such as a copy of your resume or details of your experience and qualifications.

3. Sensitive Information

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- a. Sensitive information is a subset of personal information that enlivens more stringent protection. Sensitive information includes information about a person's race, ethnicity, health, political opinions, religious beliefs, or other sensitive topics. Crafte does not generally collect any sensitive information unless you voluntarily provide it."Crafte does not generally collect any sensitive information, however if you choose to disclose sensitive information to us, we will assume that you consent to us collecting and handling it in accordance with this Policy, unless you tell us otherwise. Please be careful about what information you send to us or publish on our website or Platform.

4. How we collect personal information

- a. Personal information will only be used or disclosed for purposes beyond those listed in our Terms and Conditions and Privacy Policy if we have obtained your explicit consent, or if required or permitted by law."Crafte might collect your personal information:
 - i. if we provide you with our services, product or Platform, or otherwise in the general course of running our business;
 - ii. where you are a former, current or potential customer of a Merchant who uses our Platform to assist with its business operations;
 - iii. when you visit our website, use our Platform, contact us or communicate with us in any way (including via email, phone, chat, post or social media);
 - iv. if you do business with us, apply for a role within our team, or have any other dealings with us; or
 - v. through online surveys where you do not choose to remain anonymous.
- b. Typically, we will collect personal information directly from you, but in some cases, it might be collected from other sources. Often this is because it is not practical or reasonable to collect it from you directly. This may include information collected from:
 - i. a Merchant, to the extent that you are a Consumer (including your name, email address, telephone number, shipping address, purchase history, taste preferences, visitation history, credit balances and notes, which will be being shared with Crafte when you agree to these Terms);
 - ii. your authorised representative; or
 - iii. your recruitment agent, if you apply for a role within our team.

5. How we use and disclose your personal information:

- a. We'll generally only use and disclose your personal information for the purposes you have shared it for, such as:
 - i. enabling us to provide you with our services, products or Platform functionalities;
 - ii. performing administrative functions to support business operations, such as financial claims and payments, business operations (including staff training and recruitment) and communicating with our customers;
 - iii. enabling the functionality of our website (including supporting and managing an online member and public directory on our website), the Platform, and other online platforms owned by Crafte, including our social media accounts;

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- iv. to provide you with promotional information about our (or a Merchant's) other goods and services that we think you might be interested in;
 - v. allowing our contractors and advisers to provide the services that are necessary for us to manage our business and operations;
 - vi. conducting anonymous voluntary surveys to gain feedback on matters related to Crafte and improve our services; or
 - vii. analytics and research by Crafte, our partners and/or other users of the Platform, however this is only done so on a de-identified and aggregated basis. For example, Crafte uses such de-identified and aggregated data to determine shopping preferences of Consumers across a broader spectrum and to share such analysis with Merchants to assist them in marketing products and services to Consumers which are likely to be relevant to their preferences.
- b. Generally, your personal information is only shared with other users (including Merchants) of the Crafte Platform if you have chosen to Connect with (Follow) that user or Merchant profiles owned by a user. Other users will, however, be able to see your personal information without you Following them or their brand, if you place an order with them, subscribe to their mailing list, join their product club or have a similar interaction with them.
 - c. We do not sell your personal information to third parties.
 - d. Personal information will only ever be used or disclosed for purposes beyond those listed in this section 4 if we are required or permitted to do so by relevant laws.

6. Cross-border disclosure of personal information

- a. We will take reasonable steps to ensure that any overseas recipients of your personal information handle it in accordance with the Privacy Act. If we transfer your data overseas, you will be notified where possible, and you will have the option to withdraw consent. We will only seek to transfer personal information if it is required for the provision of services. Some of the disclosures described above may involve your personal information being shared with overseas recipients, such as:
 - i. our foreign related entities and shareholders;
 - ii. our contractors and service providers who help us operate our business;
 - iii. foreign companies with whom you place an order for products. this may include recipients in New Zealand, Singapore, UK and USA, but this may change from time to time.
- b. We will take reasonable steps to ensure that all recipients of your personal information abide by the Privacy Act and the Australian Privacy Principles.

7. Direct marketing

- a. As mentioned in section 4 above, we may use your personal information for direct marketing purposes – that is, to contact you about our products, services or events (or to recommend third party products or services) that we think you may be interested in. At the point of collection, we will ask for your consent to use your personal information for marketing purposes and provide you with an easy way to opt-out or withdraw your consent at any time.
- b. If you do not wish to receive any direct marketing communications from us, you can opt-out by contacting us at hello@Crafte.com.au or by using the “unsubscribe” function in the relevant email.

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- c. Crafte does not share any personal information to parties outside of the Crafte platform (i.e. non-users/Merchants) for direct marketing purposes.

8. How we protect your personal information

- a. Crafte stores personal information in a combination of secure computer-based storage facilities and paper-based files and records. We use encryption technologies such as SSL (Secure Socket Layer) and other industry-standard security protocols to protect sensitive financial and personal data
- b. Typically, we hold your information digitally and make use of:
 - i. password protection;
 - ii. data encryption;
 - iii. secure Australian-based servers; and
 - iv. security audits performed by a third party, to maintain the security of your information.
- c. Our officers, employees, agents and contractors are also required to protect the confidentiality of your personal information.
- d. We understand the importance of maintaining the security of your personal information and use what we believe to be reasonable security measures to protect your personal information. However, the Internet is not a fully secure environment and you should be mindful, and accept the risk, that any information you send us through the Internet may be accessed, tampered with or used in an unauthorised manner by third parties.
- e. We'll only keep your personal information for as long as required, which will generally be as long as it takes to fulfil the purpose for which it was collected (or in accordance with any consents you provide), or any other legally prescribed timeframe. After this timeframe, we'll take reasonable steps to destroy or permanently delete the personal information.

9. Access to and correction of personal information

- a. Under the Australian Privacy Principles, you have a right to request access to, or correction of, any personal information that we hold about you. If you'd like to request access or correction, please get in touch using the contact details in section 8 below. We will respond to your access or correction request within 30 days, unless otherwise specified.

10. Getting int touch

- a. If you have any concerns regarding how your personal information is handled, please contact us at privacy@Crafte.com.au. We will make every effort to address your concerns promptly before you need to escalate the matter.
- b. You can reach us by email at privacy@Crafte.com.au
- c. If you have a concern and you're not satisfied with our response, you can lodge a complaint with the Office of the Australian Information Commissioner:
- d. by phone: 1300 363 992; online at: www.oaic.gov.au