

OnePass Privacy Policy

This policy was last updated on 05 September 2023.

We made several key changes to our privacy policy you should be aware of, which includes adding:

- Officeworks as a Participating Brand and Flybuys as a Partner
- Philippines to overseas countries which we disclose personal information to; and
- When you scan your OnePass card or linked Flybuys card, OnePass, Participating Brands and Partners will collect and share your purchasing, browsing and activity history from each other and provide you with direct marketing communications and advertising.

At OnePass, your trust is important to us, which is why we keep it simple and straightforward. Depending on what you're interested in, you can read Our Privacy Promise, the Key Messages or the "Detail".

Our Privacy Promise

Before we get into the details, we want to let you know about our Privacy Promise:

- 1. Your trust is at the heart of our business.** You are at the heart of everything we do. You trust us to do the right thing with your data and we'll do our best to keep it that way.
- 2. We are clear communicators.** We'll keep it simple and straightforward. That way you can be confident about how we handle your data and protect your privacy.
- 3. Security together.** We'll help you protect your data in ways that make sense to you. We have an awesome team and great tech working hard to keep your data safe and secure.
- 4. Your experience is powered by you.** At OnePass we will always use your data responsibly to provide you with the best shopping experiences and offers that make you smile.

The Key Messages

While it would be great if you read the whole Privacy Policy, the key messages we want you to understand are:

- We work with a number of trusted third parties, including:
 - **Participating Brands** - businesses who are participating in the OnePass program and offer benefits to OnePass members. They are currently Kmart, Target, Catch, Bunnings Warehouse and Officeworks, who are also our Related Companies (see below).
 - **Partners** - other businesses that we have special arrangements with to feature their products or for them to feature OnePass. This is currently Disney+ and Flybuys.
 - **Suppliers** - third parties that help us operate OnePass or provide OnePass benefits.
 - **Related Companies** - other companies within the Wesfarmers Group (including Wesfarmers, Participating Brands and Priceline).
- When you engage as a OnePass member with the Participating Brands and Partners, we will collect and share your personal information (including your purchasing, browsing and activity history) from each other and provide you with direct marketing communications and advertising. This includes when you have linked your OnePass account, scanned your OnePass card or linked Flybuys card, or otherwise consented to marketing from the Participating Brand.

- You can unsubscribe from our direct marketing in various ways including directly from the communication itself, changing your marketing preference in your account, or [contacting us here](#).
- You can unsubscribe from direct marketing from Participating Brands and Partners by contacting them directly.
- You can raise a privacy query or make a complaint by [contacting us here](#).

The “Detail”

In this Privacy Policy, 'us' 'we' or 'our' means Wesfarmers One Pass Pty Ltd (ABN 39 650 854 845), the operator of OnePass. Our Privacy Policy sets out how we collect, use, store, and disclose your personal information.

The current version will always be published on our website (onepass.com.au) and so when we change this Privacy Policy, we will update it there and on our apps. If we make any changes to this Privacy Policy that we think are material, we will notify members through our website, app, or email.

In this privacy policy, when we refer to ‘members’ this includes a person who has purchased a OnePass membership and also a person who has registered to use OnePass and opened an account. This includes account holders and members as referred to in the OnePass terms and conditions.

What is ‘personal information’

When we refer to ‘personal information’ we mean information, or an opinion, about an individual who is reasonably identifiable, whether the information or opinion is true or not – this is basically how personal information is defined in the Australian Privacy Act.

Personal information you share with us

From time to time, we will ask you to, or you may choose to, provide us with some information. If you are, or are applying to become a OnePass member, we will need to collect:

- Your name, email address, mobile phone number, and birth month and year (to confirm that you are aged 18 or over).
- Your credit card or payment information.
- Details of the accounts you hold with the Participating Brands and some Partners.

We may also collect data from you when you interact with us, including:

- Your interactions with our emails or communications and your interactions with us on social media.
- Your device ID, device type (i.e., smartphone, computer, or tablet), traffic to and from our website and apps, browsing information on our website and apps, IP address, location, and cookie information.
- When you link your OnePass account to Participating Brands and Partners (such as Flybuys) or scan your OnePass card or linked Flybuys card at one of our Participating Brands.
- Details of the benefits (which may include offers) we provide to you, or that you have asked us about, including information to help us deliver those benefits or respond to you.

- Other information you provide to us through our website or apps, such as location information to help you find nearby stores, or interact with us via social media accounts or advertising
- Information you provide to us through customer surveys or when you enter a promotion.
- Transaction details and information you provide when you contact customer support.
- Other personal information we ask you to provide to enable your dealings with us.

Before you provide us with personal information about someone else you must have their consent to provide their personal information to us.

If you apply for a job or position with us, we may collect information (such as your name, contact details, working history, and records checks) from you, a recruitment consultant, your previous employers, and others who can help us decide whether to offer you employment or engage you.

Sometimes you may be able to deal with us anonymously or by using a pseudonym. If you do, or if you limit the information you provide to us, we may not be able to provide you with the full range of OnePass benefits.

Other personal information we collect about you

As well as collecting personal information from you, we also collect personal information about you from others where you consent or where it is otherwise in accordance with law.

We collect personal information about OnePass members from:

- Our Participating Brands, Partners, Related Companies and trusted third parties including the parties listed under 'Personal information we share'.
- Information about your purchases and transaction history from Participating Brands and Partners.
- Interactions with Participating Brands and Partners, including your activity on their websites and apps (such as the products you have viewed, added to your shopping cart, and purchased), your communications with them, your interactions with them on social media or with their advertising, and your device ID. We receive this information from the Participating Brands and Partners and through using cookies, tags, and pixels (see 'Digital Service Technologies' section below).
- Your memberships with, or subscriptions to, our Participating Brands and Partners.
- Information from publicly available sources, social media and online platforms, such as Google Marketing Platforms, Meta (including Facebook and Instagram), Pinterest, and TikTok, which may include insights based on your demographics, interests and behaviours, and whether you have similar characteristics to our current or target members.
- Your use of OnePass benefits (these may include gift cards, vouchers, rewards, offers, points multipliers, or discounts) that may be issued as part of your OnePass membership.

This personal information may relate to the time before you were a OnePass member, or before Participating Brands or Partners were part of the OnePass program, as well as more recent interactions.

We may also create new information about you or infer information about you as a result of us undertaking data analytics.

If you are a current and eligible team member within the Wesfarmers Group of Companies, we may collect certain information about you and share it with other Related Companies to provide you with team member benefits.

Why we collect and handle your personal information

The purposes for which we collect, store, use, and disclose personal information from or about you include to:

- Verify your identity and process your membership registration and subscription request.
- Operate, administer, and improve the OnePass membership program.
- Provide you with benefits from OnePass, our Participating Brands or Partners, in line with your membership or subscription (these may include gift cards, vouchers, rewards, offers, points multipliers, or discounts).
- Perform data analysis and matching to help us better understand what you like and want from OnePass, our Participating Brands and Partners. This helps us to improve your OnePass experience, and for OnePass, Participating Brands, and Partners to develop new products and features.
- Enable us to provide you with offers, experiences, and direct marketing that interest you (unless you have opted out of receiving marketing from us), display online advertising, and personalise our website and apps for you.
- Assist our Participating Brands and Partners to provide you with offers, experiences, and direct marketing that interest you, display online advertising, and personalise their websites and apps for you.
- Send you service, support, and administrative messages, and identify and fix issues and incidents.
- Invite you to complete a review of OnePass, our Participating Brands and Partners or any of their products, or participate in promotions managed by us or our Participating Brands and Partners.
- Develop insights about our members as a whole, or groups of them.
- Improve our business, including by recording interactions with you for training purposes, where we have your consent or otherwise comply with applicable law.
- Respond to queries and complaints, and conduct investigations, for example in relation to fraud or data security.
- Evaluate and manage corporate business transfers, including any related business transition activities.
- Enable us to meet our legal and regulatory requirements, resolve disputes, or protect and defend our rights.
- For other purposes where you have provided consent to us.

We may match and combine the personal information we receive from you with personal information we receive about you from Participating Brands, Partners, and Related Companies to create insights in order for us and Participating Brands, Partners and Related Companies to use your personal information more effectively.

We may also combine your personal information with the personal information of other individuals. We then use this aggregated and de-identified information for a range of purposes including to monitor the performance of OnePass and the habits of our members - this helps us understand what is working and what isn't.

How Participating Brands and Partners use your personal information

Our Participating Brands and Partners may use the personal information we share with them for similar purposes relating to their operations including to (as well as the purposes set out in their privacy policies and notices:

- Operate, administer, and improve their OnePass engagement and allow you to enjoy OnePass.
- Provide you with benefits from OnePass, our Participating Brands, or Partners, in line with your membership or subscription (these may include gift cards, vouchers, rewards, offers, points multipliers or discounts).
- Perform data analysis and matching to help Participating Brands and Partners to better understand what you like and want from OnePass or them. This helps to improve your OnePass experience and your experience with them and to develop new products and features.
- Enable them to provide you with offers, experiences and direct marketing that interest you (unless you have opted out of receiving marketing from them), display online advertising and personalise their websites and apps for you.
- Send you service, support, and administrative messages, and identify and fix issues and incidents.
- Enable them to meet their legal and regulatory requirements, resolve disputes, or protect and defend their rights.

Participating Brands and Partners may also collect personal information directly from you (and from other sources set out in their privacy policies and notices) and may combine the personal information they receive from us with other personal information they collect from or about you. That combined information may be shared between us and them.

Participating Brands and Partners have their own privacy policies, which are available on their websites, and which explain more about how they handle personal information. Participating Brands and Partners may retain personal information about you after you have stopped being a OnePass Member or after they have stopped being a Partners unless this is prohibited by law.

Personal information that we share

We may share your personal information for the purposes set out in this Privacy Policy with:

- Participating Brands and Partners so you can receive the benefits of OnePass (these may include gift cards, vouchers, rewards, offers, points multipliers or discounts) and to improve their marketing and for the purposes outlined in the section above.
- Related Companies, Suppliers, and other providers for them to help us operate the OnePass program and provide OnePass benefits. These include:
 - Payment systems operators (such as merchants receiving card payments or payment processors such as Stripe).
 - Services providers and our Related Companies for application and product development, technical support, and processing, storing, hosting, and analysing data.
 - Social media and online platforms, such as Google Marketing Platforms, Meta (including Facebook and Instagram), Pinterest, and TikTok to enable member engagement and support, and marketing and advertising, and service providers that help us manage our social media presence.

- Our professional advisers, including those that assist with communicating our offers and promotions to you, product development and market research, or provide specialist advice such as lawyers or accountants.

Other third parties we share personal information with may include:

- Your representatives.
- Government agencies, regulatory bodies, and law enforcement agencies, or as required or permitted by law.
- Parties involved in business transfer transactions (and prospective transactions).

How Related Companies Use Your Personal Information

As mentioned in this Privacy Policy, we share and combine personal information with our Related Companies to enable us and them to undertake a range of important functions. The personal information that we share and combine with our Related Companies includes:

- Information about your purchases and transaction history with OnePass and Related Companies and product and service preferences.
- Interactions with OnePass, Participating Brands, Partners, and Related Companies, including your activity on websites and apps (such as the products you have viewed, added to your shopping cart and purchased), your communications with them, your interactions with them on social media or with their advertising and your device ID. We receive this information from the Participating Brands, Partners, and Related Companies through using cookies, tags, and pixels.

We may use this personal information (and disclose it to our Related Companies) to:

- Perform data analysis and matching to help us better understand what you like and want and for insights and strategic and operational decision making.
- Enable us to provide you with offers, experiences, and direct marketing that interest you (where you have consented to receive direct marketing), display online advertising and personalise our website and apps.
- Develop aggregated insights about customer preferences, and research, survey, and improve our service offerings, advertising, and offers based on shopping and browsing habits.
- For other purposes where you have provided consent to us.
- For other purposes described in this Privacy Policy.

Our Related Companies may use it for the similar purposes relating to their operations.

Sharing information overseas

Some of our Participating Brands, Partners, Suppliers and Related Companies may transmit or store information (including your personal information) that we provide to them overseas. This may include disclosures to entities located in Canada, EU Member States (including Belgium, Denmark, Finland, Germany, Ireland, Netherlands), Japan, the Philippines, Singapore, the United Kingdom, and the United States of America.

Direct marketing and personalisation of your OnePass experience

When you join OnePass, based on the relationship between you and us, we will send direct marketing to you (unless you opt out of receiving it from us, or we are limited by law). Participating Brands and Partners who you've activated your OnePass Account with or otherwise engaged with them as a OnePass Member (including when you scan your

OnePass card or OnePass linked Flybuys card at one of our Participating Brands) may also send direct marketing to you (unless you opt out of receiving it from them, or they are limited by law). The direct marketing may be sent by email, push notification, telephone, SMS, and other permitted means.

You can stop receiving direct marketing from us through any of the following:

- Using the unsubscribe link or process in a direct marketing communication from us.
- Changing your preference within your OnePass account.
- Contacting customer support on the details below.

If you want to stop receiving direct marketing from Participating Brands or Partners you will need to contact them directly with your request, for example by clicking an unsubscribe link in a marketing email from them.

We also use, subject to compliance with applicable law:

- The personal information we collect from, or about you, to personalise the appearance of our website and apps to you.
- Online advertising as a way of promoting OnePass. This can include you seeing advertisements when you visit other websites or apps, including social media platforms. The advertisements may be based on personal information we have collected about you, your use of OnePass or your involvement with Participating Brands and Partners. You may be able to limit the personalisation of these advertisements (although you will still receive non-personalised ads when you visit other websites or apps) by:
 - blocking the use of cookies (see the 'Digital Service Technologies' section below).
 - using opt-out functionality provided by industry bodies such as optout.networkadvertising.org, optout.aboutads.info and youradchoices.com/appchoices.
 - opting out of Google Ads Personalisation: www.google.com/settings/ads.
 - using features provided by your device.

Digital Service Technologies

We may collect personal information about you when you use and access our website or apps and the websites and apps of our Participating Brands, Partners, and Suppliers (such as social media platforms). Like many website and app operators, we use digital service technologies like cookies (which are small data files transferred onto devices when a website or app is accessed), tags, and pixels (which 'tag' devices), or other similar technologies on our website and app that help us:

- Authenticate you.
- Maintain your browsing session and remember you and your preferences when you return.
- Monitor how you use our websites and apps, including the parts you visit and actions you take.
- Combine information with the Participating Brands and Partners.
- Provide you with offers and experiences that interest you from OnePass, Participating Brands, and Partners, both on the OnePass website and apps, and when you visit other websites and apps.
- Protect the security of our website, apps, and members and manage our network usage.

- Allow you to interact with social media platforms, for example by ‘liking’ and sharing our content.

We use cookies to help us collect data, which may include personal information. We will handle that personal information in the ways set out in this Privacy Policy. The cookies we use include ‘session’ cookies (which are retained only during a current browsing session) and ‘persistent’ cookies (which are retained by your device or browser between sessions).

Some of the digital service technologies used on our website and apps are created or set for third parties who provide content or services to us. These third parties include social media and online platforms such as Google Marketing Platforms, Meta (including Facebook and Instagram), Pinterest, and TikTok, and digital marketing services, advertising networks, analytics providers and content providers. See below for further description of how we work with Google. We may use other third-party services in similar ways.

You can change your cookies settings on your web browser to block some cookies but, if you do, our website or app may not work as well for you. See www.allaboutcookies.org for more information on how to change your cookie settings for many common browsers, and to learn more about cookies generally.

OnePass is working with Google to improve your online experience

If you are signed into your Google account when you use OnePass, then Google may also combine data from your Google account with data about your use of OnePass, to help identify you to be shown relevant OnePass advertising online, across your devices, and across the internet. For example, you may see advertising for OnePass, Participating Brands, and Partners on other websites you visit, based on the fact that you have visited this website. We use a range of Google services that help us monitor and more effectively display our advertising so that we can provide a better customer experience.

Google Analytics helps website owners measure how users interact with website content. For more information:

- About Google advertising cookies and Google Analytics cookies: www.google.com/policies/technologies/types/
- About Google’s Privacy Policy: www.google.com/policies/privacy/
- About how Google uses data when you use sites and apps that use Google technologies: www.google.com/policies/privacy/partners/
- On how to opt out of Google Analytics: <https://tools.google.com/dlpage/gaoptout/>

Security

We work hard to keep your personal information safe and secure. This includes building our systems with your privacy and security in mind and implementing a range of security measures including:

- Maintaining an ongoing cyber security program and team.
- Controlling access to personal information through access and identity management systems.
- Implementing information security, privacy and confidentiality related policies and processes.
- Regularly reviewing our security program and controls to protect your personal information appropriately.

Accessing or correcting your personal information

You can [contact us here](#) if you:

- Want to request access to the personal information we hold about you.
- Think any personal information we hold about you is inaccurate, out of date, incomplete, irrelevant, or misleading and you want it corrected.

Please select “My Data & Privacy” and follow the prompts. You will need to include your name, contact details, and details of the personal information you want access to or would like corrected. We will then consider your request, and we may need to verify your identity.

You can also contact us using the email address set out in the “Contact us” section below.

Making a complaint

If you wish to make a complaint about how we have handled your personal information, you can [contact us here](#). Please select “My Data & Privacy” and follow the prompts. You will need to include your name, contact details and details of your complaint.

We will respond to your complaint in a reasonable period of time. If you disagree with our response, we will provide you with information about what action you can take, including making a complaint to the Office of the Australian Information Commissioner (whose details are set out below).

Contact us

We have tried to be clear in our Privacy Policy, but if you have any questions about it or our practices please [contact us here](#) or use the details below:

OnePass Privacy Officer
Wesfarmers One Pass Pty Ltd
Level 6, 699 Collins Street
Docklands 3008 VIC
privacy@onepass.com.au

How to contact the OAIC

Office of the Australian Information Commissioner

Website: www.oaic.gov.au

Phone: 1300 363 992