



Ascenda



ASCENDA PRIVACY POLICY

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Important: Please carefully read the following privacy policy (“**Privacy Policy**”) that applies to your access and use of the Virgin Money Australia Rewards Hub (the “**Rewards Hub**”), and any of the services provided therein.

When you read this Privacy Policy, “**User**”, “**you**”, “**your**”, or “**yours**” mean an end user of the Rewards Hub and the words “**Ascenda**”, “**we**”, “**our**” and “**us**” collectively refer to Ascenda Australia Pty Ltd (ACN: 639 682 063), a company incorporated in Australia, and Ascenda Loyalty Pte Ltd (UEN: 201412402H), a company incorporated in Singapore, and their successors, assigns, and affiliates.

By accessing or using the Rewards Hub, you acknowledge that you have read and understood, and agree to be bound by, this Privacy Policy with Ascenda. If you do not agree to this Privacy Policy, kindly do not access or use the Rewards Hub. Ascenda may at any time change this Privacy Policy and any continued access and/or use of the Rewards Hub shall be conditioned upon acceptance of the updated Privacy Policy.

This Privacy Policy must be read in conjunction with Ascenda’s Terms and Conditions, which may be accessed [here](#)

INTRODUCTION

The Rewards Hub is operated and maintained by Ascenda on behalf of Virgin Money Australia, a division of Bank of Queensland Limited ABN 32 009 656 740 (“**Virgin Money**”).

Ascenda complies with applicable privacy and data protection laws when dealing with personal data. Personal data means data about an individual who can be identified from that data. This policy sets out how Ascenda will collect, use, disclose and protect personal data that you provide to us when you access and use the Rewards Hub and any services offered by us through the Rewards Hub. This Privacy Policy does not limit or exclude any of your rights under applicable laws.

CHANGES TO THIS POLICY

We may change this Privacy Policy by uploading a revised policy onto the Rewards Hub. The change will apply from the date that we upload the revised policy.

WHO DO WE COLLECT YOUR PERSONAL DATA FROM YOU

We collect personal data about you from:

- you, when you provide that personal data to us, including via the Rewards Hub and any related services, through any registration process, through any contact with us or when you buy or use our services
- third parties where you have authorized this, or where information is publicly available

WHAT PERSONAL DATA DO WE COLLECT

Whenever you access or make use of the Rewards Hub or any of our services, we may collect the following types of personal data from you:

(a) personal data that you provide directly to us, including:

- when you make a transaction: your email address, name, phone number and any other personal data required by our third-party suppliers to fulfill your booking
- information about your transactions with us and our business partners
- information contained in your correspondence with us, for example when you send us an email or give us a call
- any other information required to provide our services

(b) personal data collected during the course of your use of the Rewards Hub and/or our services, including:

- any Submissions (as defined in the Reviews, Comments and Other Submissions clause of our Terms of Use)
- usage data such as the IP address of your computer and the URLs of the website pages you visit

(c) personal data collected from third parties where you have authorized this or the personal data is publicly available

(d) information collected through our use of cookies or similar technologies. Please refer to the Cookies section of this Privacy Policy for further information, including information on how you can disable these technologies. You may be asked to provide billing information in relation to the Rewards Hub or our services, including your billing address and debit or credit card information. We use Stripe to process debit or credit card transactions. We do not store your debit or credit card information. You can view Stripe's privacy policy at: <https://stripe.com/sg/privacy>

HOW WE USE YOUR PERSONAL DATA

(a) We use the personal data provided directly by you:

- to provide the Rewards Hub and our services to you, including the usage of Virgin Money points (“Virgin Money Points”) to redeem various products and services
- to verify your identity
- to improve the Rewards Hub and our services that we provide to you
- to respond to communications from you
- to combine any information that we collect from you or otherwise obtain with information we obtain from our trusted partners in order to improve the customer experience of using the Rewards Hub and our services provided to you

(b) We use information generated by your access or use of the Rewards Hub or our services:

- to monitor the performance of the Rewards Hub or our services and ensure that these perform in the best manner possible
- for security and system integrity purposes

We may also combine information we collect (aggregate) and remove personally identifiable (anonymize) information to conduct research and statistical analysis. This Privacy Policy does not apply to our use of such aggregated or anonymous information.

(c) We may also use your personal data:

- to protect and/or enforce our legal rights and interests, including defending any claim
- for any other purpose authorized by you or applicable law
- to respond to lawful requests by public authorities, including to meet law enforcement requirements
- to transfer your information in the case of a sale, merger, consolidation, liquidation, reorganization or acquisition

DISCLOSING YOUR PERSONAL DATA

We do not rent, sell, or share personal data about you with third parties or non-affiliated companies except to provide products or services that you have requested, when we have your authorization or under the circumstances outlined in this Privacy Policy. We may disclose your personal data to:

- our related or affiliated companies
- our third-party suppliers – we share your personal data, such as your name and contact details, with such suppliers to enable them to provide the products or services you may request through the Rewards Hub, such as a travel booking or a gift card purchase. Your personal information may be disclosed to overseas recipients, including recipients in Singapore, to the extent needed to process transactions or provide services to you. Further details can be obtained by emailing us at privacy@ascendaloyalty.com
- Virgin Money – we share your personal data with Virgin Money so that you can earn and redeem your Virgin Money Points. Please review Virgin Money’s privacy policy for more information on their privacy practices
- any business that supports our services and products, including any person that hosts or maintains any underlying IT system or data center that we use to provide the Rewards Hub or our services or to process payments and our trusted third-party partners. Important third parties that support the Rewards Hub or our services include:
 - Stripe – any billing or payment information you provide through the Rewards Hub
 - Amazon Web Services – a cloud computing services provider that hosts your personal data on our behalf
 - Google Analytics – a web analytics service provider that tracks and reports website traffic
 - Third-party suppliers of products or services that you request through the Rewards Hub

- our professional advisers e.g. accountants, lawyers, auditors
- any other person authorized by you
- any other company in the case of a sale, merger, consolidation, liquidation, reorganization or acquisition

We may disclose research and statistical analysis on an anonymized basis derived from your personal data to third parties.

We may also disclose information we hold about you if we believe that such disclosure is necessary to:

- comply with legal requirements or process
- protect our rights or property
- enforce this Privacy Policy or any other agreement that we may have with you

We share information about your use of the Rewards Hub with our trusted social media, advertising and analytics partners through the use of cookies, web beacons and similar storage technologies. Please refer to the Cookies section for further information.

PROTECTING YOUR PERSONAL DATA

We take reasonable steps to keep your personal data safe from loss, unauthorized activity, or other misuse. We implement appropriate technical and organizational measures to ensure a level of security appropriate to risks inherent in processing personal data. You can play an important role in keeping your personal data secure by maintaining the confidentiality of any password used in relation to our products and services. Please do not disclose your password to third parties. Please notify us immediately if there is any unauthorized use of your account or any other breach of security.

ACCESSING AND CORRECTING YOUR PERSONAL DATA

Subject to certain grounds for refusal set out in the applicable law, you have the right to access your readily retrievable personal data that we hold and to request a correction to your personal data. Before you exercise this right, we will need evidence to confirm that you are the individual to whom the personal data relates. In respect of a request for correction of personal data, if we believe the correction is reasonable and we are reasonably able to change the personal data, we will make the correction. If we do not make the correction, we will take reasonable steps to note on the personal data that you requested the correction. If you want to exercise either of the above rights, email us at privacy@ascendaloyalty.com. Your email should provide evidence of who you are and set out the details of your request (e.g. the personal data or the correction that you are requesting).

INTERNET USE

While we take reasonable steps to maintain secure internet connections, if you provide us with personal data over the internet, the provision of that information is at your own risk. If you follow a link on the Rewards Hub to another site, the owner of that site will have its own Privacy Policy relating to your personal data. We suggest you review that website's privacy policy before you provide personal data.

CONTACT US

If you have any questions about this Privacy Policy, our privacy practices, or if you would like to request access to, or correction of, your personal data, you can contact us here: privacy@ascendaloyalty.com

MAKING A COMPLAINT

If you have any concerns about our privacy practices and how we handle your data, you can contact us using the contact details stated above.

Once we have received your complaint, we will investigate and respond to you within a reasonable period of time. We take every privacy complaint seriously and will deal with your complaint fairly and promptly.

DATA RETENTION POLICY

The personal data that we collect and process will not be kept longer than necessary for the purposes for which it is collected, or for the duration required for compliance with applicable law, whichever is longer.

COOKIES

We use cookies (an alphanumeric identifier that we transfer to your computer's hard drive so that we can recognize your browser) to monitor your use of the Rewards Hub. We use the following types of cookies for the following purposes:

- In particular:
 - identifying users and keeping users logged in
 - remembering user preferences (language, currency, etc.) based on previous visits
- The cookies are of permanent nature and under the Rewards Hub's control

We also use Google Analytics to analyze your use of the Rewards Hub and to analyze the demographics (on an aggregated and anonymous basis) of users of the Rewards Hub. If you would like to customize or opt out of these settings please visit: <https://tools.google.com/dlpage/gaoptout>. Information about Google's cookies is available from: <https://www.google.com.au/policies/technologies/types/>. Google's privacy policy relating to its cookies is available at <https://www.google.com/policies/privacy/partners>. You can control and/or delete cookies as you wish. You can delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed. If you do this, however, you may have to manually adjust some preferences every time you visit the Rewards Hub and attempt use our services, you may not be able to access certain parts of the Rewards Hub or services, and some functionalities may not work. You can find out more information about how to change your browser cookie settings at <http://www.aboutcookies.org.uk>