

## PRIVACY POLICY

Last updated 3 April 2024

This Privacy Policy applies to all personal information collected by JustFund Operations Pty Ltd via the website located at [www.navio.com.au](http://www.navio.com.au) and/or the Navio Questionnaire.

The Navio product and brand is owned and operated by JustFund Operations Pty Ltd. JustFund is a legal and financial technology company committed to addressing the inequality and financial challenges individuals face when dealing with a separation, and improving the legal experience for both individuals and their family lawyers for the better.

We respect your privacy and are committed to protecting your personal data.

### 1. What is "personal information"?

- (a) The Privacy Act 1988 (Cth) currently defines "personal information" as meaning information or an opinion about an identified individual or an individual who is reasonably identifiable:
  - (i) whether the information or opinion is true or not; and
  - (ii) whether the information or opinion is recorded in a material form or not.
- (b) If the information does not disclose your identity or enable your identity to be ascertained, it will in most cases not be classified as "personal information" and will not be subject to this privacy policy.

### 2. What information do we collect?

The kind of personal information that we collect from you will depend on how you use the website. The personal information which we collect and hold about you may include:

- Contact details such as your name, mailing or street address, email address, telephone number and other contact details, age or date of birth, etc;
- Information used to initially meet and discuss with lawyers including information about your relationship, your children, and your financial situation; and
- Information about how you use our system such as your device ID, device type, computer and connection information, geo-location information, statistics on page views, IP address, traffic to and from the sites and standard web log information.

For more information about the personal information collected via the Navio Questionnaire, please refer to the Data Handling clauses contained in our Law Firm Terms of Service [here](#) and Client Terms and Conditions [here](#).

### **3. How we collect and process your personal information**

- (a) We may collect personal information from you whenever you input such information into the website or Navio Questionnaire.
- (b) We also collect cookies from your computer which enable us to tell when you use the website and also to help customise your website experience. As a general rule, however, it is not possible to identify you personally from our use of cookies.

### **4. Purpose of collection**

The purpose for which we collect personal information is to provide you with the best service experience possible on the website and Navio Questionnaire.

### **5. Sharing your information**

We disclose information to the extent required to enable us to provide our service to you.

If you use the website and/or Navio Questionnaire, we may disclose your personal information for the purposes described in this privacy policy to:

- Law firms or other third parties that you expressly consent that we disclose your information to;
- our employees;
- maintenance and support personnel acting in the normal course of their duties;
- service providers who assist us in operating the website and providing the service;
- anyone to whom our assets or businesses (or any part of them) are transferred, provided that they agree to deal with your personal information in a manner consistent with the terms of this Privacy Policy; and
- other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

### **5. Your rights in relation to your information**

You have the right to:

- Request access to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully

processing it. You can also self-serve by viewing the answers you provided by logging back in to our system.

- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected. You can also self-serve by changing the answers you provided by logging back in to our system.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedom.

## **6. Access and correction**

Australian Privacy Principle 12 permits you to obtain access to the personal information we hold about you in certain circumstances, and Australian Privacy Principle 13 allows you to correct inaccurate personal information subject to certain exceptions. If you would like to obtain such access, please contact us as set out below.

## **7. Complaint procedure**

If you have a complaint concerning the manner in which we maintain the privacy of your personal information, please contact us as set out below. All complaints will be considered by Marcus Manduci and we may seek further information from you to clarify your concerns. If we agree that your complaint is well founded, we will, in consultation with you, take appropriate steps to rectify the problem. If you remain dissatisfied with the outcome, you may refer the matter to the Office of the Australian Information Commissioner.

## **8. Overseas transfer**

Your personal information may be transferred overseas or stored overseas. It is not possible to identify each and every country to which your personal information may be sent. If your personal information is sent to a recipient in a country with data protection laws which are at least substantially similar to the Australian Privacy Principles, and where there are mechanisms available to you to enforce protection of your personal information under that overseas law, we will not be liable for a breach of the Australian Privacy Principles if your personal information is mishandled in that jurisdiction. If your personal information is transferred to a jurisdiction which does not have data protection laws as comprehensive as Australia's, we will take reasonable steps to secure a contractual commitment from the recipient to handle your information in accordance with the Australian Privacy Principles.

## 9. How to contact us about privacy

If you have any queries, or if you seek access to your personal information, or if you have a complaint about our privacy practices, you can contact us through: [support@navio.com.au](mailto:support@navio.com.au).