



Complete Business Group

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Call Tracking Analytics

CBG Privacy Policy



Complete Business Group
Privacy Policy – Updated May 2018

About this Privacy Policy

Complete Business Group understands and appreciates that privacy is a major concern for all our Customers as it is for Complete Business Group. As part of providing our services, Complete Business Group is committed to:

- ensuring we comply with the Data Protection Law applying to us; and
- dealing effectively with your enquiries and complaints concerning our compliance with privacy laws, regulations and codes.

This Privacy Policy describes how we collect, use and handle Personal Data both about our Customers and on behalf of our Customers when providing our services, where those activities come with the GDPR.

Please read this policy carefully to understand how we will treat your Personal Data. If you have any questions, please contact us using the details provided below.

What information we collect and why

Our Services

Complete Business Group provides call analytics services to Customers, which include small, medium and large businesses. Our services (collectively, “Call Analytic Services”) include:

- helping Customers track and evaluate the performance of their advertising, by measuring and analysing telephone calls generated by online, mobile and offline ad campaigns;
- helping Customers drive sales leads and/or other desired outcomes through targeted ad campaigns, and providing related analytics services; and
- providing Customers with call recording and other data services for their inbound calls.

As part of providing these Call Analytic Services, we collect Personal Data.

Customer Information

The Personal Data we collect about our Customers is called ‘Customer Information.’

We collect Customer Information in the following circumstances:

Opening a customer account: If you wish to become a customer, or if you are acting on behalf of a customer or prospective customer of Complete Business Group, we require your name, residential and email addresses, and telephone number.

We may also ask for:

- copies of documents confirming your identity, such as your: driver’s licence, passport, birth certificate and/or utility bills; and
- other information, such as your credit card or bank account details (which may include a photocopy or scanned image of the front and back of your credit card). That information may be used to set up a direct debit, for example.

Enquiries, blogs and on-line interaction: If you send us an enquiry through our Site, we may collect your name, phone number and email address. We may also collect your responses to our correspondence and to any promotions running on the Site.

Our Site may include publicly accessible blogs or community forums. Please note that any information you provide in these public areas may be read, collected, and used by other internet users.

Credit information: Sometimes we provide credit to Customers. To do that, we may collect and hold credit information and credit eligibility information about those Customers. We may combine credit reporting information from a credit reporting body with our own information about your credit worthiness, and we may use that combined information to determine whether to offer credit to you.

Call recordings: Calls to Complete Business Group offices and service centres may be recorded for verification and quality assurance purposes.

Third-party analytics services. We may use automated devices and third-party applications, such as Google Analytics and Marketo, to evaluate the usage of our Site and the effectiveness of our email marketing. We and our third-party providers may also use other analytic technologies (e.g. clear GIFs) to evaluate and improve our Site, its performance and our users' experience. To perform their services, the third party service providers may use cookies and other tracking technologies. Those third parties may also combine the information that we provide about you with other information that they have collected.

Tracking technologies: Complete Business Group and our partners and suppliers of analytics and other services may use tracking technologies such as web beacons, e-tags, and Javascripts to analyze trends, administer our Site, track users' movements around our Site, and obtain demographic information about our user base. Reports generated from the use of these technologies may be provided to us, containing data grouped on an individual and/ or an aggregated basis.

We also collect information about suppliers of goods or services to Complete Business Group, including name, position, business and email addresses; and telephone numbers. This information will be treated as 'Customer Information.'

Individual Information

The information we receive from our Customers about their current or prospective customers or that we collect on behalf of our Customers, generated by our Call Analytics Services, is called 'Individual Information.'

We process Individual Information in the following circumstances:

Cookies: We collect information from cookies used to provide our service which may include:

- your IP address,
- information on your browser software,
- page(s) visited (including the time and date of visit), and
- keyword searches conducted.

Online usage and analytics data: We collect online usage and analytics data from Customer and third-party websites (sometimes using cookies and pixels). We may link that information with other online information we collect from third parties (including cross-device information), as well as information we collect offline. This information includes:

- IP address,
- date and time stamp,
- device ID,
- cookie ID,
- URL and referring URL,
- browser type,
- advertising identifiers,
- header information, and
- other information about the ad or web page or mobile application the user was viewing.

We also collect data on calls placed to our Customers, such as caller ID information, and may link that information to:

- the online activity we have collected,

- information collected from third parties (which may include cross-device information), and
- information we have collected offline.

We may also record calls placed to our Customers, at the Customer's election.
We do not collect sensitive information as part of providing Call Analytic Services.

What we use Personal Data for

We collect and use the Personal Data described above in order to provide you with the Services in a reliable and secure manner and in particular:

- to identify you;
- to provide our Call Analytic Services, and manage, administer, and control the quality of, those services;
- to market our products and services to you, and to enable selected third-party partners to market products and services to you;
- to do research and analysis related to our services, and to develop and improve our services;
- to assist with your enquiries or complaints;
- to protect our rights and property and to comply with our legal obligations; and
- any other purpose required or permitted by law.

Marketing and opting out

With your consent, we may use and disclose your Personal Data for marketing purposes, including to:

- identify your behaviours, habits and preferences; and
- enable different members of the Complete Business Group Group and selected third party partners to send you product and service information directly.

You will be able object to or withdraw your consent from future marketing communications from us at any time by:

- Using the 'unsubscribe' link in any email communication; or
- Contacting us by email at info@completebusinessgroup.com.au

You may withdraw your consent to receiving third party marketing material at any time. Please follow the instructions in the advertising material or on that party's website, or email info@completebusinessgroup.com.au

Lawful basis for processing

Our lawful basis for processing the Personal Data we collect includes:

- if you are an existing or prospective Customer to fulfil any contractual agreements between you and us and as part of our "legitimate interest", and
- in promoting our services to you, we rely on your consent before contacting you by electronic means for this purpose or require that our Customers obtain such consent.

Cookies and AdWords

Cookies

Complete Business Group and our service providers may use cookies (persistent or single session) and other tracking technologies (described below) to provide Call Analytics Services and to obtain about to the use of our Site.

We do not use cookies to retrieve information that was not originally sent by us to you in a cookie.

You may choose to refuse cookies but, if you do so, some of the functionality of our site and of our Customers' sites may no longer be available to you.

For more information about cookies, including further details as to what they are and how to refuse them please see our Cookies Policy.

For more general information about cookies, please visit: <http://www.aboutcookies.org/>

Google Ad settings

To help manage their advertising and websites, our Customers may use our Call Analytics Services together with Google products such as AdWords, Google Analytics, and DoubleClick-branded services. For information about using Google Ads Settings to manage the Google ads you see, and opting out of Google Ads Personalization, please visit: <https://www.google.com/policies/technologies/ads/>

Third party sites

Our Site may contain links to third-party sites and social media features (for example, Facebook and Twitter buttons and widgets). Social media features are either hosted by a third party or hosted directly on our Site. We have no control over those third-party sites, and we are not responsible or liable for their content or the privacy practices applying to them.

For information about those companies' privacy practices and how they may use your Personal Data, please visit the company websites.

For information about how to opt out of having your information collected in mobile applications, please visit: <https://www.ghostery.com/support/global-opt-out/>.

Individual Rights

Individual Information

In supplying our Call Analytic Services we are providing information collection services to our Customers, and do not have a direct relationship with the individuals whose information we process.

If you are an individual (not a Customer) and wish to access or seek correction or deletion of Individual Information processed by us as part of our Call Analytics Services, or otherwise exercise your rights in regard to your Personal Data, you should direct your query to the Customer concerned (who controls the data). In

particular, if you are an individual who no longer wishes to be contacted by one of our Customers, please contact that business directly.

We will assist Customers in ensuring the fulfilment of Customers' obligations to respond to requests for exercising individual rights as laid down in the GDPR, including the right to access, correct and delete Individual Information and the right to object to or restrict processing including automated profiling which leads to decision making.

Customer Information

Quality of information

We will take reasonable steps to ensure the Personal Data we hold about you is accurate, up-to-date and complete.

Please let us know if there is a change to any of the Customer Information you have given to us.

Access to Customer Information

Customers can access the Customer Information Complete Business Group holds about them.

Your Personal Data will usually be available within 30 days of your request (subject to allowable exemptions). We will let you know if additional time (which will not exceed two additional months) is required. We may require evidence of your identity when processing your request for access to your Personal Data.

Rectifying Customer Information

You have a right to ask us to correct any inaccurate Customer Information we hold about you. We will take reasonable steps to correct your Personal Data to ensure it is accurate, up-to-date, complete, relevant and not misleading.

Erasing Customer Information

You have a right to ask us to erase any Customer Information we hold about you. We will do that without undue delay where one of the grounds specified in Article 17 GDPR applies.

If we made your Customer Information public and are obliged to erase that data, we will, taking into account available technology and the cost of implementation, take reasonable steps, including technical measures, to inform any controllers which are processing the Personal Data that you have requested the erasure.

Right to withdraw consent

If we have collected and process any Personal Data on the basis of your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Customer Information conducted in reliance on lawful processing grounds other than consent.

Right to object and data portability

You can object to processing of your Customer information, ask us to restrict processing of your Customer Information or request portability of your Customer Information.

Right to object to automated profiling

You can object to decisions being taken based solely on automated means, including profiling, which produce legal effects concerning you or similarly significantly affect you

Exercising Rights

You can exercise any of these rights by contacting us using the contact details provided below.

Data Sharing and International Transfers

We may share your Personal Data with the following recipients:

- Our contracted service providers which provide services such as IT and system administration and hosting, credit card processing, research and analytics, marketing, customer support and data enrichment;
- With third-party social networks, advertising networks and websites, which usually act as separate controllers, so that we can market and advertise on third party platforms and websites;
- Our third party partners who may contact you regarding their products or services;
- In individual cases, with professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services;

Any Personal Data or other information you choose to submit in communities, forums, blogs, or chat rooms on our websites may be read, collected, and/or used by others who visit these forums, depending on your account settings.

We may disclose your Personal Data:

- to regulators and law enforcement agencies and other relevant government authorities and agencies, where legally required; and
- as otherwise required by law (e.g. in connection with subpoenas, search warrants, court orders or other legal processes).

Sharing within the Complete Business Group Group

Companies in the Complete Business Group Group may share or grant access to Personal Data with other companies in the group (i.e. subsidiary or affiliate companies). This is on a need-to-know basis, and where necessary to fulfil a request you have submitted via our websites, or for customer support, marketing, technical operations and account management purposes.

Change in ownership

If the ownership of the Complete Business Group Group or any part of it is transferred (e.g. as the result of a corporate merger, or bankruptcy), or there is a sale of assets, then some or all the Personal Data and non-Personal Data we hold may be transferred to the new owner.

We will notify Customers (for example, via a message to the email associated with your account) of any such transfer or sale and outline your choices in the event,

Data Transfers

Complete Business Group may transfer and process Personal Data to and in other locations around the world where Complete Business Group or its Sub-processors maintain data processing operations as necessary to provide the Services.

Data Transfers from the EEA and Switzerland

Where Personal Data is transferred from the European Economic Area and/or Switzerland to a member of Complete Business Group's group of companies or Sub-Processor located in a country not recognized by the European Commission or the Swiss Federal Data Protection Authority as providing an adequate level of protection for Personal Data, Complete Business Group will enter into the EU Model Clauses on Customer's behalf with such Complete Business Group entity based outside of the EEA and Switzerland and involved in the processing of Personal Data.

Complete Business Group will provide a copy of those EU Model Clauses to Customer upon Customer's written request.

If Complete Business Group adopts Binding Corporate Rules or another alternative data export solution (as recognized under EU Data Protection Law), then the EU Model Clauses will cease to apply with effect from the date that Complete Business Group implements such new data export solution.

Making Complaints

Contact Complete Business Group

If you have a question or concern about how we have handled your Personal Data, please let us know so we can address it, by contacting us using any of the details below.

We will aim to respond to all requests, complaints and other contracts within a reasonable time, usually 30 days. Complete Business Group takes all privacy complaints seriously and our Privacy Officer aims to efficiently resolve any issue arising from a complaint.

EU Representative

Because we are based in Australia and do not have an office in the EU, we have appointed Spider Guard as our Data Protection Representative in the EU.

Spider Guard will primarily deal with any communications with EU data protection authorities.

You may also wish to contact Spider Guard if you have any queries, questions, concerns or wish to make a complaint regarding how we deal with your Personal Data and would prefer to deal with a local organisation.

Complaint to the Data Protection Authority

The GDPR also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred.

If you are in the EU, please follow this link to locate the data protection authority most relevant to you: http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm.

Data retention and deletion

Complete Business Group will not retain any Personal Data longer than necessary to fulfil the purposes for which it is processed, including the security of our processing, complying with legal terms and regulatory obligations (e.g. audit, accounting and statutory retention terms), handling disputes and for the establishment, exercise or defence of legal claims.

Where Complete Business Group:

- no longer needs to use or disclose your Personal Data for any authorised purpose; and
- is not legally required to retain that information,

then we will take reasonable steps to destroy the Personal Data or have it de-identified.

Deletion of Customer Information

To request removal of any Customer Information held by Complete Business Group, including from a Complete Business Group blog or community forum, contact us at info@completebusinessgroup.com.au
We may not be able to remove Personal Data in every case – if we cannot comply with your request we will let you know and explain why.

Security

Security measures by Complete Business Group

Complete Business Group will implement and maintain appropriate technical and organizational security measures to protect against Personal Data Breaches and to preserve the security and confidentiality of Personal Data processed by Complete Business Group on behalf of Customer in the provision of the Call Analytic Services. Complete Business Group may update or modify the Security Measures from time to time provided that such updates and modifications do not result in the degradation of the overall security of the Services purchased by the Customer.

Security Measures by Customer

Customer is responsible for using and configuring the Services in a manner which enables Customer to comply with Data Protection Laws, including implementing appropriate technical and organizational measures.

Notification of Personal Data Breach

In accordance with its obligations under the GDPR, Complete Business Group will inform the competent Supervisory Authority and the Data Subject in the event of a Personal Data Breach affecting Customer Information.

Upon becoming aware of a Data Breach affecting Individual Information, Complete Business Group will notify Customer without undue delay and will provide all information relating to the Data Breach as reasonably requested by Customer.

Complete Business Group will use reasonable endeavours to assist Customer in mitigating the adverse effects of any Personal Data Breach.

Other provisions

Scope

This Privacy Policy applies to Complete Business Group (ABN 38 171 428 142) and its subsidiary and affiliate companies (collectively “Complete Business Group”, “we”, “us”, “our” and “Complete Business Group Group”).

It applies to the activities of Complete Business Group to the extent they fall within the operation of the GDPR.

Definitions

In this policy:

Controller means an entity that determines the purposes and means of the processing of Personal Data.

Customer includes all users of any of our services, any prospective customers, suppliers and other third parties who we may deal with, individuals who may contact us by phone or email and other visitors to our Site.

Customer Suppliers means an entity the Customer has engaged, selected or nominated as an integration partner.

Data Protection Law means the GDPR.

Data Subject as the meaning given to it in the GDPR.

GDPR means Regulation 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data (General Data Protection Regulation).

Personal Data means any information relating to an identified or identifiable natural person as defined in the GDPR.

Personal Data Breach means an event affecting Complete Business Group leading to the accidental or unlawful loss or unauthorized disclosure of or access to Personal Data.

Processing has the meaning given to it in the GDPR.

Processor means an entity that processes Personal Data on behalf of a Controller.

Representative has the meaning given to it in the GDPR.

Sensitive Data has the meaning given to it in the GDPR.

Site means our website www.CompleteBusinessGroupcorp.com and our other websites.

Sub-processor has the meaning given to it in the GDPR to the extent that the relevant Processor is engaged by Complete Business Group to process Personal Data for Call Analytics Services but does not include Processors when acting in their capacity as Customer Suppliers.