

# Privacy policy

**FoodSwitch** is managed by The George Institute for Global Health (**The George Institute, we and our**), and we are committed to handling personal information in accordance with applicable privacy laws, including the Australian Privacy Principles set out in the *Australian Privacy Act 1988* (Cth).

In this policy, **FoodSwitch** refers to the FoodSwitch mobile applications f (the **FoodSwitch Apps**) and periodic updates.

If regional legislation applying where you live requires a higher standard of protection of personal information protection than the Australian Privacy Principles, then we will follow that higher standard.

This Privacy Policy explains how we collect, hold, use and disclose your personal information when you use FoodSwitch.

Please read this Privacy Policy together with any other privacy policy we provide on specific occasions when we are collecting or processing your personal information, so that you are fully aware of how and why we use your data. This Privacy Policy supplements other notices, statements, consents and privacy policies in relation to FoodSwitch. We may update this policy from time to time. You may obtain a copy of our current Privacy Policy [here](#) or by contacting us at the contact details below.

## What types of personal information do we collect and why?

We collect the information you provide when you create an account on the FoodSwitch App. This includes your name and email address. We will not collect any sensitive personal information.

We may also collect some information automatically when you use FoodSwitch including:

- **Mobile Device Access:** We may request access to certain features of your mobile device, including your
  - *Camera* to capture barcodes; and
  - *Social media or other accounts* (Apple ID, Google account or Facebook) to login to your account.

If you wish to change any of our access or permissions, you may do so in your device's settings but this may prevent you from using all or some of the functionality of the FoodSwitch App.

- **Mobile Device Data:** We may automatically collect device information (such as your mobile device ID, model and manufacturer), operating system, version information and IP address; and
- **Push Notifications:** We may request to send you push notifications regarding your account or the FoodSwitch App. If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings.

We collect this information to:

- **Facilitate account creation and login processes:** If you choose to link your FoodSwitch account to a third-party account (such as Google or Facebook), we use the information you allowed us to collect from those third parties to facilitate account creation and login processes for the performance of the contract. For further information, see the section below headed **How do we handle your social media logins?**
- **Send administrative information to you:** for example, product, service and new feature information and/or information about changes to our terms, conditions, and policies;

- **Request feedback:** about your use of FoodSwitch;
- **To protect FoodSwitch:** to keep FoodSwitch safe and secure (for example, for fraud monitoring and prevention);
- **To deliver services:** to provide new and updated functions such as shopping lists and health scores, respond to inquiries, solve any issues you have with the use of FoodSwitch and generally to improve user experience; and/or
- **For other business purposes:** such as data analysis, identifying usage trends, and to evaluate and improve FoodSwitch and your experience. We may use and store this information in aggregated and anonymized form so that it is not associated with individual end users and does not include personal information. We will not use identifiable personal information without your consent.

We will only collect your personal information if you agree, and you wish to access additional features of FoodSwitch. We will collect your personal information only by lawful and fair means.

## Can you deal with us anonymously?

You will not be able to register anonymously on FoodSwitch or by using a pseudonym, but where lawful and practical, you will be given the option to deal with us without identifying yourself or by using a pseudonym (e.g. when inquiring about FoodSwitch).

## How do we handle your social media logins?

If you choose to register with FoodSwitch using a social media account, we may have access to certain information about you. Your registration will also involve you sharing certain information with your social media provider.

We will receive certain profile information about you from your social media provider. The profile information we receive may vary depending on the social media provider concerned, but may include your e-mail address, IP address or user identifier.

We will use the information we receive only for the purposes described in this Privacy Policy or that are made clear to you on the FoodSwitch App. We do not control, and are not responsible for, other uses of your personal information by your third-party social media provider. We recommend that you review their privacy policy to understand how they collect, use and share your personal information, and how you can set your privacy preferences on their sites and apps.

## How do we collect and hold your personal information?

We collect your personal information

- directly from you when you register through the FoodSwitch App, and
- automatically via Google Analytics for Firebase (described below in the section **Do we use analytic technology?**) including via identifiers for mobile devices (including Android Advertising ID and Advertising Identifier for iOS), cookies and similar technologies.

# How do we store and hold your personal information?

We store and hold your personal information in electronic records and systems which we maintain, or which are maintained for us by external service providers. The database is cloud based and stored on servers located in the United States maintained by Google Cloud Platform ([Privacy Policy](#)).

We use physical security and other measures to protect personal information that we hold against misuse, interference and loss, and from unauthorised access, modification and disclosure. Please refer to the section under *Data Security* below.

# How do we disclose your personal information?

We may disclose your personal information to authorised staff and external service providers who are performing services in relation to FoodSwitch and are responsible to us.

Our staff and external service providers must comply with privacy and confidentiality terms as part of their employment or engagement with us.

We may also disclose your personal information as directed or permitted by law or court order.

# Do we use analytic technology?

We may also partner with selected third-party vendors, such as Google Analytics for FireBase to allow tracking technologies on the FoodSwitch App through the use of first party cookies and third-party cookies, to, among other things, analyse and track users' use of the FoodSwitch App, determine the popularity of certain content and improve services and user experience.

The Google Analytics for FireBase features we have implemented in the FoodSwitch App include *BigQuery, Crashlytics, FCM* and *FireBase Remote Config*.

By using the FoodSwitch App, you consent to the collection and use of your information by these third-party vendors. You are encouraged to review their privacy policy and contact them directly for responses to your questions. We do not transfer personal information to these third-party vendors. If you wish to know more about how your personal information is collected and used by tracking technologies, you can find the Google Analytics for FireBase privacy policy [here](#). If you wish to opt-out of tracking in Google Analytics for FireBase look at the Google Analytics Opt-out Browser add-on [here](#) , [Network Advertising Initiative Opt-Out Tool](#), [Digital Advertising Alliance Opt-Out Tool](#) or contact us for further information.

You should be aware that if you get a new phone or re-install the FoodSwitch App, you may also clear certain opt-out cookies, plug-ins, or settings.

# Data Security

We have put in place measures to protect the security of your information. We limit access (by physical and technical safeguards) to your personal information to those staff and trusted external service providers who have a business or legal need to know.

We maintain computer and network security by using firewalls, user identifiers and passwords to control access to our computer system.

We have also put in place procedures to deal with any suspected data breach and will notify you and any applicable regulator of a suspected breach if we are legally required to do so.

# Marketing

We may use your personal information to offer you products and services which we believe may interest you, but not if you tell us not to.

If you receive electronic marketing communications such as event communications and newsletters from us, you may opt out of receiving further marketing communications by following the opt-out instructions provided in the communication.

## Do we disclose your information to overseas recipients?

We store your personal information in our cloud-based server located in the USA which is operated by Google Cloud Service. Only a limited number of authorised FoodSwitch personnel located in Australia can access your personal information.

## How long will we keep your information?

FoodSwitch is a long-term project and has no end date. We will hold your data indefinitely or until you request to be removed. We will ask you periodically to confirm your consent or you may withdraw it at any time.

We will retain your personal information for as long as reasonably necessary to fulfil the purposes we collected it for and to satisfy any legal, regulatory, or reporting requirements.

## How can you access and correct your personal information?

You may request access to, or seek correction of, your personal information that we hold, by writing to [us](mailto:us) at:

**Address:** Level 5, 1 King Street, Newtown, NSW 2042 Australia

**Email:** [privacy@georgeinstitute.org](mailto:privacy@georgeinstitute.org)

We will generally not charge a fee for such requests, but we may charge a reasonable fee if your request is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

Typically, we will respond to your request within 10 - 20 business days, but sometimes we may require more time depending on the circumstances.

In your request, please ensure that you provide a reply address, so that we can contact you if we are unable to locate your personal information, if we need to verify your identity, or if we cannot carry out your request (in which case, we generally tell you why).

## How do I delete my personal information?

You may request deletion of your personal information by completing the [Request your profile to be deleted](#) form. Typically, we will complete your request within 10 - 20 business days, but sometimes we may require more time depending on the circumstances. Please ensure that you provide the email address used to login into FoodSwitch, so that we can contact you to verify your identity and send confirmation when your request has been completed.

## What should you do if you have a complaint about the handling of your personal information?

Please set out your complaint in writing to the Privacy Officer:

**Address:** Level 5, 1 King Street, Newtown, NSW 2042 Australia

**Email:** [privacy@georgeinstitute.org](mailto:privacy@georgeinstitute.org)

Please provide sufficient information, so that we can consider your concerns and contact you. Typically, we will respond to your complaint within 10 – 20 business days.

If you are not satisfied with our response, or you consider that we may have breached the Australian Privacy Principles or the *Privacy Act 1988* (Cth), you are entitled to make a complaint to the Office of the Australian Information Commissioner. The Office of the Australia Privacy Commissioner can be contacted by telephone on 1300 363 992 or full contact details can be found online at [www.oaic.gov.au](http://www.oaic.gov.au).

## How are changes to this privacy policy made?

This Policy was created in March 2021. We may amend this Privacy Policy from time to time. Please refer to the FoodSwitch App for the latest copy.