

Privacy Policy

Peoplebench

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1. Privacy Statement

Peoplebench Pty Ltd ACN 623 119 620, an Australian registered company ("Peoplebench", "we", "our", "us") consider your privacy to be important and we take our responsibility to protect it seriously. We understand that you are concerned about your privacy, along with the confidentiality and security of any personal information that you provide to us.

This privacy policy (**Policy**) sets out how we collect, hold, use and disclose information about individuals who deal or interact with us.

We treat all personal information collected by us in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**), the Australian Privacy Principles contained within the Privacy Act and this Policy. If there is any inconsistency between the Privacy Act and this Policy, the Privacy Act will prevail to the extent of the inconsistency.

2. Anonymity

Due to the nature of the services we provide it is generally impractical for us to deal with you without knowing your name and your contact details. However, where it is practical for us to do so, we shall provide you with the option to deal with us anonymously or by using a pseudonym.

3. Collecting personal information

Personal information is information or an opinion of an individual whose identity is apparent or can be reasonably ascertained. We store a range of personal information that is provided as a part of our business and through the use of our products and services. This information is collected from a wide variety of sources including:

- (a) through the Peoplebench platform (**Platform**) provided through the website located at the domain name <peoplebench.com> (the **Site**);
- (b) from you accessing the Platform, conducting business or intending to conduct business with us, whether past, present or future;
- (c) by otherwise having some form of contact with us such as by mail, telephone, email, internet, or via our Website or the Platform; and/or
- (d) through any of our other business activities, promotions or events.

Personal information collected by us may include:

- (a) your name, gender or age;

- (b) your contact details such as your mobile number, telephone number and email address;
- (c) your credit card or banking information;
- (d) your business address;
- (e) all logs, which may include information such as your internet protocol (**IP**) address, browser type, browser version, clickstream data, referring URLs, the pages of our Site that you visit, the time spent on any pages of our Site and other log related information relating to your use of our Site.

We endeavour to only collect personal information about you where it is reasonably required.

4. Use of personal information

We automatically gather information to monitor the use of our Site and Platform. Much of the data we collect is aggregated, and this information is effectively anonymous to us.

In general we use personal information for providing, evaluating, improving, personalising and developing our business, our Site, Platform and other products / services that we may offer from time to time. More specifically, we use personal information for:

- (a) establishing and maintaining your relationship as our client;
- (b) providing any products and services you have requested from us;
- (c) administering and managing products and services provided to you;
- (d) answering your inquiries and providing you with support;
- (e) improving user satisfaction, particularly with regard to the Platform;
- (f) promoting and marketing our services to you (each person may opt-out of direct marketing and sales communications);
- (g) our internal research and statistical purposes; and
- (h) enabling us to forward to you other information or material which we believe may be of interest to you (each person may opt-out of our information sharing communications).

5. Direct Marketing

As set out above, we may use your personal information for the purposes of directly marketing our products and services to you. By using the Site or Platform you consent to the collection and use of your personal information for such purposes.

If you do not wish to receive direct marketing communications from us, you can easily opt-out of receiving such communications by following the directions for unsubscribing in the communication received from us.

6. Disclosure of personal information

We do not disclose your personal information to any third party without your personal consent.

Aside from the above, we will only disclose personal information as legally required – either upon valid court order, as required under the Privacy Act, or where compelled by a law enforcement or governmental agency.

7. Protecting your personal information

7.1 Steps we take

We take reasonable steps to protect personal information we hold from:

- (a) misuse, interference and loss; and
- (b) unauthorised access, modification or disclosure.

The precautionary steps we take to protect personal information include:

- (a) adopting measures to protect our computer systems and networks for storing, processing and transmitting personal information;
- (b) adoption of procedural and personnel measures for limiting access to personal information by our staff;
- (c) reviewing our information collection, storage and processing practices; and
- (d) such other security measures we consider reasonable and appropriate from time to time.

Notwithstanding that we use our best endeavours to protect all personal information we collect and hold, please be aware that we unfortunately cannot guarantee its complete security and will not be responsible where it is obtained by illegal third party actions.

7.2 Deleting your personal information

When personal information is no longer required to be kept by us, we will take reasonable steps to destroy or delete the personal information in a confidential manner.

8. Overseas disclosure

8.1 No overseas disclosure

We store all personal information that we collect on servers located in Australia and do not disclose or transmit this information overseas, unless otherwise specified in this Policy.

8.2 Disclosure for analytics

We may use Google Analytics to track your usage of our Site. Google Analytics is a web analysis service provided by Google. Google utilises the data collected to track and examine the use of the Site, to prepare reports on the Site's activities and share them with other Google services.

Google may use the data collected to contextualise and personalise the ads of its own advertising network. Personal data collected by Google includes cookie and usage data, which is processed in the USA. You can find Google's privacy policy here: <http://www.google.com.au/policies/privacy/>.

8.3 Consent to overseas disclosure

Other than as contemplated in this clause 8, we will only disclose your personal information to an overseas recipient if:

- (a) you consent to the transfer; or
- (b) the disclosure of the information is required or authorised by or under an Australian law, other applicable law or a court/tribunal order.

We will take reasonable steps to ensure such overseas recipients do not breach the Australian Privacy Principles (APPs) or are subject to laws or a scheme substantially similar to the APPs.

9. Third parties

Our Site, Platform, products and services we provide may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the privacy policy of every site you visit.

We have no control over, and assume no responsibility for, the content, privacy policies, or practices of any third party sites, products or services whatsoever.

You should be aware that your ability to opt-out of a third party tool or platform will depend on the conditions governing your agreement with that third party.

10. Accessing and updating your personal information

10.1 Access to Personal Information

We will provide you with access to your personal information held by us unless:

- (a) giving access would be unlawful; or
- (b) denying access is required under the Privacy Act or any other applicable law.

10.2 Request for Access

You will have the option through your account in the Platform to access your personal information supplied to us. You will also be provided with the ability to delete your personal information by way of cancelling or terminating your account.

If you do not have an account or are otherwise unable to access any specific personal information you believe we have collected, you must contact us in writing making a request for it to be disclosed to you. You may contact us via email at data@peoplebench.com.au.

Following receipt of your request, we will contact you and either provide you with the information you have sought, or return to you with an explanation detailing why we will not provide you with the information.

10.3 Amending your personal information

You will have the option through your Platform account to amend and update your personal information supplied to us.

If you are unable to amend personal information that we hold through your account, please contact us to request the amendment. You may contact us via email at data@peoplebench.com.au. If we elect not to correct your information, we will notify you, within a reasonable time, of the reason for our refusal, the mechanisms available for you to complain about our refusal and such other matters required by the Privacy Act.

If you wish to have your personal information deleted and cannot do so through your account, please let us know and we will take all reasonable steps to delete it, unless we need to keep it for legal reasons.

11. Complaints

We strive to ensure our compliance with this Policy and to regularly review our practices against it.

If at any time you have a complaint against us regarding our Policy, including a breach of the Privacy Act, we invite you to make a complaint at hello@peoplebench.com.au. All complaints made will be dealt with in confidence. We endeavour to respond within 30 days of receipt of a complaint with a resolution or proposed resolution to the issue raised.

Please note that you may also make a complaint to the Office of the Australian Information Commissioner (OAIC) about the handling of your personal information. Information on making a privacy complaint can be found on their website at <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>.

12. Variations

We reserve the right to vary this Policy from time to time. Any variations made will be updated on our website. It is your responsibility to check our Policy periodically to ensure you are aware of any changes made to it.

13. Further information

For any further information about this Policy please contact us.