

Social Pinpoint Pty Ltd (ACN 164 471 425) (“we”, “us” or “our”) recognises the importance of your privacy and appreciates that your personal information is very important to you. We are committed to complying with our obligations under the Australian Privacy Principles (“APP”) set out in the *Privacy Act 1988* (Cth) (“Act”).

This privacy policy sets out key information regarding the collection, use, disclosure and security of your personal information, and of your ability to access and correct it.

Our policy applies to you if you use our website or contract with us (Client) under any of our terms and conditions in relation to use of our site/s or applications (Sites) or information technology services and products we provide (Products and Services), or if you provide personal information to any other end user of our Sites or Products and Services (each a User).

We may amend this privacy policy at any time without notice to you. Please check our privacy policy regularly for updates. Your continued use of our Products and Services or Sites or your continued dealings with us shall be deemed to be your agreement to, and acceptance of the terms of this policy (as amended from time to time). You consent to our collection, disclosure, use and storage of personal information as described in this privacy policy.

If, at any time a User provides personal information or other information about someone other than the User, that User or individual warrants that it has the person’s consent to provide or disclose such information to us. For the avoidance of doubt, where any User provides personal information to us about someone other than the User which is captured by the Act and our obligations, that User consents to us complying with our policy in relation to that person’s personal information. This consent and agreement overrides any inconsistent term and condition of our contract with that User.

Collection

How information is collected

We may collect personal information from you in a variety of ways, including without limitation, when:

- you register your details on our Sites or subscribe for our Products and Services;
- you make an enquiry with us or contact us in any way;
- you request information from us;
- you submit comments to us;
- you participate in our surveys, marketing, profiling, product development or research campaigns;
- when a User accesses the Sites or Products and Services and we require the User to provide details to permit access;
- when Users access the Services or Products and Services through the Internet and we collect information using cookies or analytical services;
- information is provided to us by Users which is stored by us as part of our Products and Services;
- information is otherwise provided to us about individuals associated with the Products and Services we provide; and
- Users visit parts of our Sites. Your visit may automatically provide us with data about your computer, such as your IP (Internet Protocol) address, browser type, operating system, domain name, access times, and referring web site addresses. We use this automated data to obtain general statistics regarding the use of our Sites and its specific sections and to evaluate how our visitors use and navigate our Sites on an aggregate basis.

Some of the above information is collected directly from individuals using our Sites, Products and Services. We may also collect your personal information from third parties, including other Users, service providers, contractors, agents,

related bodies corporate and affiliated companies. If they give us your personal information, we will rely on them to tell you that they are giving your personal information to us, and to make you aware of this privacy policy. If you do not provide us with your personal information, or we are unable to collect your personal information, we may not be able to properly provide you or other Users with our Products and Services, or provide you with access to our Sites, certain information or material.

What information we collect

We mainly collect information about your contact details (such as your name, address, email, and phone and mobile numbers) including thoughts, issues, feedback etc about User's projects. However, there may be circumstances where we may collect other personal information either directly from you or as a result of Users using our Sites and Services (such as billing addresses, dates of birth, gender, nationality, details of licenses & registrations, associations, family details, passwords and usernames, employment details and other details provided by you to our Users).

If you provide us with information directly, we may use that information to make offers or invite you to participate in events or trade promotions which we think could be of interest to you. That information may be used in an aggregate form to help improve our Products and Services.

We may also collect non-personal information about individuals such as information regarding the use of mobile devices, computers, operating systems, networks and browsers. This may include IP addresses. Where non-personal information is collected the Australian Privacy Principles do not apply.

We do not generally collect health, criminal, medical and other sensitive information about individuals except in the case of where that information is stored as part of our Products and Services for any of our Users. In these circumstances, you consent to collection, use, disclosure and storage of this information in accordance with this policy.

Use

We collect your personal information to deliver Products and Services to our Users and potential Users. To achieve this, we may use your personal information for a number of purposes including:

- Providing access to Users to our Sites and Products and Services;
- to respond to your enquiries, questions and information requests;
- to provide you with access to certain areas or features of our website;
- to communicate with you about our or certain third parties' products, services, promotions and offers;
- to process certain sales orders;
- to provide you with necessary support or customer services and improve customer service;
- for product development, market research, and other marketing and promotional activities;
- to carry out our legal compliance obligations;
- in connection with legal proceedings or for exercising, defending or establishing our legal rights;
- for any other purposes set out in any document, material or medium through which your information is collected.

We may use your personal information for the primary purpose for which it is collected. For example, to respond to your enquiries about our Products and Services or provide Users with our Products and Services. However, you acknowledge that as cloud service providers, we may not directly collect personal information from you but receive that information by Users accessing our Products and Services. We rely on those Users knowing the purpose for which that information was collected and those Users not instructing us to use this information for any other purpose and we accept no responsibility for any misuse in this regard.

We may also use your personal information provided directly to us for related secondary purposes that you would

reasonably expect or that you consent to, such as sending you mail or emails with details of new products, services, special offers or promotions that may be of interest to you. By submitting your personal information to us, you expressly consent to us using your personal information that you provide to us directly (and not through another User using our Products and Services) to provide you with information about our Products and Services or events or any other direct marketing activity which we consider may be of interest to you.

You may at any time opt out of receiving any communications from us (other than as required for the operation of our business e.g. regarding the payment of subscription fees) by contacting us using the details set out at the bottom of this document. However, this may prevent us from offering our Products and Services and may terminate the individual's access to some or all of the Sites or Products and Services provided by us.

Disclosure

We will not disclose your personal information to any person except to our related entities, contractors, suppliers or service providers, or agents used by us in the ordinary course of our business (eg operating our Sites, providing our Products and Services etc). In doing so, we will take all steps as are reasonable to ensure that these parties respect and uphold the provisions of this policy in relation to your personal information and keep your personal information confidential and not to use or disclose it for any purpose other than the purpose of performing their work for us.

We may also disclose your personal information where you consent to us doing so or as is otherwise allowed or required by law.

Your personal information may be disclosed to a recipient in a foreign country, but only where Users use our Products and Services in that foreign country and this disclosure is contemplated as part of our Products and Services (including but not limited to recipients in Canada and South Africa for example where Users of our Products and Services have offices located overseas).

Before personal information is disclosed to a recipient in a foreign country, the Act requires us to take such steps as are reasonable in the circumstances to ensure that the recipient does not breach the Australian Privacy Principles in relation to the information. However, if you consent to the disclosure of your personal information to overseas recipients, we are not required to take such steps.

By submitting your personal information to us, you expressly consent to the disclosure, transfer, storage or processing of your personal information outside of Australia. In providing this consent, you understand and acknowledge that countries outside Australia may not have the same privacy protection obligations as Australia in relation to personal information.

Security

We store personal information:

- (a) contained in paper based and other hard copy documents both at our office and at off site secure storage facilities; and
- (b) contained in electronic records, in a controlled and secure environment.

Those records are only accessible by those persons who require access to the personal information for the purposes of carrying out their work on our behalf.

We will take all reasonable steps to protect the personal information we hold from misuse and loss and from unauthorised access, modification or disclosure.

If you or a User transmits your personal information to us over the internet, we use encryption technology to ensure your information is protected when being transmitted. We offer use of a secure server so that all supplied information is transmitted via a secure socket layer (SSL) technology and can only be accessed by those persons with special access rights. We keep any passwords within our control confidential but are not responsible for any misuse or loss of, or unauthorised access to, personal information where the security of information is not within our control.

We will take reasonable steps to destroy or de-identify personal information when our legal obligations to retain the

information have expired and the information is no longer needed by us. For the avoidance of doubt, we may reasonably consider that information is still required by us in order to recommence providing our Products and Services.

Access and correction

You may seek access to your personal information which we hold about you and we will provide you with access in accordance with the APP. We may require that you provide suitable identification for security purposes before allowing you to access your personal information. Where permitted by the APP, we may charge an access fee to cover the reasonable cost of retrieving the information and supplying it to you. Access to your personal information may be refused in a number of circumstances, such as where the information relates to anticipated legal proceedings or the request for access is frivolous or vexatious. If we deny or restrict your access, we will give you reasons why.

We rely on the personal information we hold in conducting our business. Therefore, it is very important that the personal information we hold about you is accurate, complete and up to date. If you become aware that any personal information we hold about you is incorrect, incomplete or not up to date, please contact us using our contact details set out in below to correct or update your personal information.

To access or correct your information please see the details at the end of this policy

Removal

We are able to remove User data on request from our Clients. If you are an end User please direct your request to the Site that you entered your data on. We can help find that for you and help process that request by using our contact details below. Please note, deletion will take place over a period of time equal to our backup retention policies (7-30 days)

Third party websites

Our Sites may contain links to websites owned or operated by third parties, including websites owned or operated by our related bodies corporate or affiliated companies. In addition, other websites may also link to our Sites. We take no responsibility for the privacy practices, content or policies of third party websites, or any contractual or legal obligations of the operators of third party websites. These third party websites may contain their own privacy policies and their owners or operators are responsible for informing you about their security and privacy practices. We recommend that you thoroughly read the privacy policies of these third party websites. We detail our use of third party services here - [Our Third Party Services and Sub-Processes](#)

Cookies

The type of personal information we collect on our Sites depends on how you use our Sites. If you merely visit and browse through our Sites, you will not be required to provide us with any personal information unless you make an enquiry about our Products and Services, or engage in another activity which results in the collection of your personal information. However, upon your visit to our Sites, our host may record your server address, the date and time of your visit and the pages viewed. This information may be collected using cookies. Cookies track user preferences and patterns of use. They enable our website to interact more efficiently with your computer and help us to tailor our website to better match your interests and preferences. You may be able to reset your browser to refuse all cookies or to indicate when a cookie is being sent. If you disable the use of cookies, your use of our Sites may not function optimally. We will ask you if you want to use cookies if your region requires it. In general our cookies fall into a few categories

- **Strictly necessary cookies:** They include, for example, cookies enabling you to securely log into our website, authorization checks, use our platform, sign up for analytical and other services or purchase services.
- **Analytical/performance cookies:** These cookies allow us and our third-party service providers to recognize and count the number of visitors and to see how visitors move around our website when they are using it. This helps

us improve how our website works by, for example, ensuring that users can easily find what they need on our website. These cookies generate aggregate statistics that are not associated with an individual account or visitor.

- **Functionality cookies:** These cookies enable helpful but non-essential website functions that improve your website experience. By recognizing you when you return to our website, they may, for example, allow us to personalize our content for you, greet you by name, or remember your preferences (for example, your choice of language or region). These cookies may enable visitor identification across websites operated by Social Pinpoint.
- **Third-party cookies:** Our website may contain helpful but non-essential features or plug-ins enabling third party services that use cookies, such as social network connectors, maps, advertising networks, or web traffic analysis services. These cookies may enable visitor identification across websites and over time. We do not control the third party's use of those cookies. Please review each party's cookie disclosure before consenting to this use category.

Pseudonymity Or Anonymity

You have the option of not identifying yourself, or of using a pseudonym, when dealing with us except where an Australian law permits or requires us to deal with individuals who have identified themselves or where it is impractical for us to deal with individuals who have not identified themselves or adopted a pseudonym.

Complaints

If you have any complaints alleging a breach of any APP by us, or a registered APP code (if any) that binds us, please contact us using our contact details set out in paragraph below.

We treat all complaints received seriously and will endeavour to respond to you within a reasonable time frame.

Contact details

If you have any concerns or questions, please feel free to contact us using the details below:

Attention	Privacy Officer
Address	Suite 5, 119 Beaumont Street, Hamilton NSW 2303
Email	data@socialpinpoint.com
Phone	1300 030 329