

Privacy Policy

The effective date of this Privacy Policy is 5 October 2021. This Privacy Policy describes the way that Psafe and related group entities (together, collectively referred to as “**Psafe**” or “**us**” or “**we**”) collect, store, use and disclose any “**personal information**” (as defined under the *Privacy Act 1988* (Cth) or the *Privacy Act 1993* (New Zealand) (as applicable) (the “**Act**”)) that we collect from any visitors (“**you**” or “**your**”) to this website, the Psafe App or any of our other websites, or social media sites (together, collectively referred to as the “**Platform**”).

By providing personal information to us, you consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy and any other arrangements that apply between us. We may change our Privacy Policy from time to time by publishing changes to it on our website, or on the Platform. We encourage you to check our website, or the link to the Privacy Policy on the Platform, periodically to ensure that you are aware of our current Privacy Policy.

Your use of the Platform is conditional upon you accepting this Privacy Policy. By using the Platform you are deemed to have accepted this Privacy Policy. If you do not agree with any of the terms and conditions of this Privacy Policy, you should cease using the Platform. If this Privacy Policy is inconsistent with our legal obligations under the Act that cannot otherwise be lawfully excluded, this Privacy Policy will apply subject to those overriding obligations under the Act.

1. What kinds of information are collected and stored by Psafe?

We collect “personal information”, which is information or an opinion about an individual that is reasonably identifiable. For example, this may include your name, age, gender, postcode and contact details. We may collect the following types of personal information:

- your name;
 - email address;
 - telephone number and other contact details;
 - your mailing or residential address;
 - age or date of birth;
 - your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;
 - details of the products or services we have provided to you or that you have enquiries about, including any additional information necessary to deliver those products and services and respond to your enquiries;
 - any additional information relating to you that you provide us directly through the website, on the telephone, or through the app or indirectly through your use of our website or app or online presence or through other websites or accounts which you permit us to collect information; and
- any other personal information that may be required in order to facilitate your dealings with us.

We may collect these types of personal information either directly from you, or from third parties (such as your employer). We may collect this information when you:

- activate your account, or interact with our website;
- communicate with us through correspondence, chats, emails, or when you share information with us from other applications, services or websites; or
- interact with our sites, services, content and advertising.

We endeavour to collect your information directly from you. However, in some circumstances we may collect your information from third parties, such as your employer or contracting organisations, a service provider or from a publicly available record.

We may also collect sensitive information from you from time to time. Sensitive information is defined in the *Privacy Act 1988* (Cth) and is a subset of personal information and includes health information, information about a person's racial or ethnic origin, religious beliefs or affiliations, membership of a professional or trade association, membership of a trade union, sexual orientation, or criminal record. If we collect "sensitive information" from you, we will seek your consent to do so. If you provide us with unsolicited sensitive information in the course of using the Platform, you consent to us using the information for the purpose for which it was disclosed.

You may choose to withdraw your consent in respect of our collection and use of your sensitive information at any time by contacting us using the contact information in section 12 below.

However, you should note that we might not be able to provide our services to you if you withdraw your consent for us to use your personal information, or sensitive information, which has been disclosed to us. We also collect non-identifying information when you use our Platform, such as "Log Data" (including, a record of the IP address of your device, the date and time of your visit to the Platform, the pages accessed and documents downloaded, and the referring web page) and "Cookies" (as explained below). This information does not usually contain personal information which can identify you.

2. Persons under 18 years of Age

Psafe maintains a strict position with respect to collecting personal information from children under the age of 18. If you are under the age of 18 and wish to provide personal information to us, you must obtain your parent's or guardian's consent before providing us with that information. Psafe reserves the right to delete your information, if appropriate.

3. Why Psafe collects, holds, uses and discloses personal information

We collect, hold, use and disclose your personal information for various purposes relating to our business, including but not limited to the following purposes:

provision of personal support services by way of the Psafe App or a dedicated telephone line;
managing your subscription to any alerts or mailing lists;

- sending you information about new updates and developments regarding our products and services that you have ordered or enquired about or that we believe may be of interest to you;
 - assisting in any marketing, advertising and promotions relating to any of our products and services; sharing your information with third party service providers, such as service providers that provide employee assistance and personal support programs, to enable them to provide services to you and that relate directly to -us providing services to you;
 - investigating complaints;
 - for security purposes;
 - as part of a sale or transfer of assets or other corporate transaction;
 - to communicate with you in the event that there has been a data breach involving your personal information;
- and to comply with any other obligations that we may have under the law or otherwise.

We keep your personal information for as long as is reasonably necessary in order for us to provide our services to you. We may retain your personal information if it is necessary for us to comply with our legal obligations, to resolve disputes with you or third parties and/or to enforce our legal rights.

We may disclose personal information for the purposes described in this Privacy Policy to:

- our employees and related bodies corporate;
- third party suppliers and service providers;
- to other professionals who have been onboarded and integrated as part of our network in order for you to obtain personal support services;
- our existing or potential agents, business partners or partners;
- anyone to whom our assets or businesses (or any part of them) are transferred;
- specific third parties authorised by you to receive information held by us;
- and/or other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

4. Will your personal information be disclosed to anyone else?

Other than as specified in this Privacy Policy, your personal information will not be disclosed to a third party without your consent. However, Psafe cannot control, and will not be liable for, any use of your personal information by any third party to whom your information is disclosed with your consent. Psafe does not control, and is not responsible for the practices employed by, any other websites or services linked to or from our Platform, including the information or content contained within them.

When you use a link to go from our Platform to another website or service, our Privacy Policy does not apply to those third-party websites or services. Your browsing and interaction on any third-party website or service or social media platforms, including those that have a link on our website, are subject to that third party's own rules and policies. If you interact with us via any form of public posting on the Platform, then you acknowledge that you are disclosing information publicly to anyone else capable of accessing the Platform and you are responsible for that content or information. You should be aware that others may use, tag and re-publish your content or information in that context, including us.

5. What happens if we cannot collect your personal information?

If you do not provide us with your personal information as requested by us, some or all of the following may occur:

- we may not be able to communicate with you about our products and services;
- we may not be able to provide you with some or all aspects of our services (for example, if you do not establish an account with us, you will not be able to use and access our services);
- we may not be able to provide you with information about services that you may want, including information regarding any complaints you may have regarding our services;
- and/or we may be unable to tailor the content of our services to your preferences and your experience of our services may not be as enjoyable or useful.

6. Cookies

A “cookie” is a small data file that many websites use in browsers to maintain user sessions from time to time. We use web logs and cookies to generate statistics and other anonymous data to assist us to gain a better understanding of visitor preferences to our Platform. Most Internet browsers automatically accept cookies. You can instruct your browser (via the options section) to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit, however, doing so may mean you will not be able to use all or parts of our Platform.

7. How does Psafe protect and secure your personal information?

We take reasonable care to protect personal information that we collect and hold from misuse, loss, unauthorised access, unauthorised modification or unauthorised disclosure. We protect personal information by implementing reasonable and up to date security measures as well as through application of our relevant policies, practices and procedures.

8. What are your rights?

Accessing or correcting your personal information

You can access the personal information we hold about you by contacting us using the information below. Sometimes, we may not be able to provide you with access to all of your personal

information and, where this is the case, we will tell you why. We may also need to verify your identity when you request your personal information.

If you think that any personal information we hold about you is inaccurate, please contact us and we will take reasonable steps to ensure that it is corrected.

Making a complaint

If you think we have breached the Privacy Act, or you wish to make a complaint about the way we have handled your personal information, you can contact us using the details set out below. Please include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint within a reasonable period of time. If you think that we have failed to resolve the complaint satisfactorily, we will provide you with information about the further steps you can take.

9. Your ability to opt out

If you wish to opt out of receiving our email newsletter from us, you can follow the instructions to unsubscribe in our emails to you, or you can contact us by using the contact information in section 12 below.

10. Complaints

If you are concerned about how we collect, hold, store, use or disclose your personal information, please contact us using the contact information in section 12 below. We will use reasonable endeavours to address your enquiry or complaint and will endeavour to respond to you within 30 days of receipt of your initial enquiry or complaint. To the extent that we feel your complaint is complex or that we require further time to provide a substantive response, we will send you a notice to that effect. You must provide all reasonable assistance to us to allow us to address your enquiry or complaint, including providing us with all appropriate and relevant information and feedback on request.

If you feel your enquiry or complaint has not been adequately addressed by us, you may contact the regulator in your jurisdiction. However, we highly recommend that you notify us beforehand as to why you feel we have not adequately addressed your enquiry or complaint and to give us an opportunity to further assist you in that respect.

Office of the Australian Information Commissioner

GPO Box 5218

Sydney NSW 2001

Tel: 1300 363 992

Web: www.oaic.gov.au

11. Contact us

If you have any questions about this Privacy Policy or any of the practices described herein, if you wish to update information we hold about you, make a complaint, request a copy of our most current Privacy Policy, if you believe that personal information about you is inaccurate or out of date, or if you suspect that there has been a data breach, please contact us:

Forbidden due the policy of the project

12. Further information

If you would like any further information about your rights to privacy, please contact or visit:

- if you are an Australian resident, the website of the Office of the Australian Privacy Commissioner: <https://www.oaic.gov.au/>.