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LeadMe VR Player - Privacy Policy

Purpose

This policy is used to inform users of LeadMe VR how the app collects, uses, and shares user data, and with whom. The Personal Information that we collect is used for providing and improving the Service. We will not use or share your information except as described in this privacy policy.

Effective Date

This policy is effective as of 25/3/2022 and replaces any previous LeadMe VR Player Privacy Policy.

We may update our Privacy Policy from time to time. Thus, you are advised to review this page periodically for any changes. We will notify you of any changes by posting the new Privacy Policy on this page.

Scope

By accessing or using the LeadMe VR app, you agree to the terms of this privacy policy, including the use of Third Party Services, as outlined below. If you do not agree to these terms, please do not access or use this Service.

Definitions and Terminology

Information Security Team A team of relevant staff nominated to champion best-practice cybersecurity in the organisation. Refer to the Organisational Chart or contact the Head of Technology for current details.

Service The LeadMe VR mobile app.

Policy

1. Information Collection and Use

Users engage with LeadMe VR as a single role - as a viewer. To ensure appropriate use of the app and to maintain data privacy and security, there is no data information collection.

2. **Permissions**

To provide the Service, LeadMe VR requests the following permissions:

- Camera access this is required to establish which VR headset the user has. Camera access is used only to scan a QR code on the provided headset. Camera access is not used for any other purpose, is not stored, and is not shared in any way.
- Read of External Storage this is only required for loading locally saved videos. This allows a user to select a video that has been saved on the local storage or external storage such as an SD card. Storage data is not retained or stored, and is not shared in any way.

3. Security

We value your trust in providing us with your Personal Information and strive to use appropriate technical and administrative safeguards to maintain the integrity and security of your data. However, no method of transmission over the internet or electronic storage is 100% secure and reliable, and thus we cannot guarantee absolute security. If a data breach occurs, we will notify you in accordance with applicable laws and regulations, and take appropriate steps to investigate and remedy the situation.

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4. Children's Privacy

We do not knowingly collect personally identifiable information from children under 18 years of age. In the case we discover that a child under 18 has provided us with personal information, we immediately delete this from our servers. If you are a parent, educator or guardian and you are aware that your child has provided us with personal information, please contact us so that we will be able to take necessary actions.

5. Handling Reports and Grievances

- 5.1. If a user wishes to provide feedback or report a grievance or related request, they are encouraged to email dev@lumination.com.au. A written complaint is preferred as it provides clear detail of the reported issue and a paper trail for all parties involved.
- 5.2. Lumination will confirm receipt of the communication within 2–3 working days, and will seek to ensure we have a clear understanding of the issue that has occurred, the outcomes sought, and any expectations the user may have.
- 5.3. Lumination will assess the complaint, perform relevant investigations into the validity of the issue and its causes, and will generate a strategy to address the breach, minimise any harm, and prevent it from recurring.
- 5.4. Lumination will endeavour to keep the user informed throughout this process, and users are likewise welcome to request a progress update if needed.
- 5.5. Documentation and record keeping will be conducted throughout the process, inclusive of user communications and assessment and mitigation activities.
- 5.6. Lumination will endeavour to resolve issues as quickly as practicable. In line with <u>OAIC guidelines</u> users are asked to allow up to 30 days for the issue to be resolved, particularly in complex cases,
- 5.7. If a user is unsatisfied with Lumination's response, they are encouraged to contact OAIC for further support. Please ensure your complaint is in writing as per <u>OAIC guidelines</u>.

Contact Us

If you have any questions or suggestions about our Privacy Policy, do not hesitate to contact us at dev@lumination.com.au.