

# **Privacy Policy**

Updated [01/08/23]



Joy Business Academy Limited (JBA) (we/us/our), is committed to protecting your personal information. SkillsVR follows the directives from the CCPA (California Consumer Privacy Act), GDPR (General Data Protection Regulation European Union) and Privacy Act 2020 (New Zealand) and this Privacy Policy has been designed to help you understand how and why we collect information from you, how we store it, how you can access and correct that information and when we might disclose information to other people.

This Privacy Policy is relevant when you visit our website, use our service (SkillsVR web portal, Enterprise solution, marketplace, application for VR headset and Facilitator application), other services supplied by SkillsVR, or contact us in any way.

#### What information may we collect?

We may collect the following information from you:

- contact information (First name, Last name, email, name of the organization, phone number)
- date of birth (used for reporting purpose only)
- VR Sessions that you were a part of and their details
- details of your organization and locations where VR sessions are running
- details of VR headsets you are using (alias, firmware version and application version used)
- information you provide while interacting with us
- web tracking data for analytics purpose
- cookies and local storage files, which are pieces of information transferred to your computer hard drive for record-keeping (such as your preferences on our Website or pages of Website you have been visiting)

Providing some information is optional. If you choose not to enter personal information such as names, email, and phone numbers, we'll be unable to sign you up for using our website.

#### How may we use the information we have collected?

We collect your personal information in order to:

- to verify your identity
- to provide services and products to you and to improve them, such as:
- allow users to take part in VR sessions using VR and Facilitator applications



- allow users to create and modify VR Sessions using the website
- manage their hardware devices used to run VR Sessions
- manage users who have access to those VR Sessions and related information
- to market our services and products to you, including contacting you electronically (e.g. by text or email for this purpose\*)
- to bill you and to collect money that you owe us
- to respond to communications from you, including a complaint
- to conduct research and statistical analysis (on an anonymised basis)
- to protect and/or enforce our legal rights and interests, including defending any claim
- To respond to you on any queries, complaints or requests you might have made, and other customer care activities
- for any other purpose authorized by you or the Privacy Act

#### Where is your data stored?

We securely store your data with our third-party leading Cloud service provider in Australia.

#### How do we protect your personal information?

If we have collected personal information about you, we'll take reasonable steps to ensure that the information is stored in a secure environment protected from unauthorized access, modification, or disclosure.

## How could you access and update your personal information?

We respect your right to privacy, view, and update the personal information we hold about you.

Where possible, we aim to provide you with access to your personal information and give you ways to update, except where prohibited by legislation or it affects our business.

In some cases, you may need us to update your information on your behalf. In such instances, we will ask you to verify your identity before we can act on your request.

You can do this by contacting us at one of the addresses described in this policy below.

<sup>\*</sup>you shall have the opportunity to unsubscribe from receiving these messages.



### **Deleting your personal information**

If you request that your personal information is deleted, we will remove all personally identifiable attributes (name, email address, contact details) from your records, unless we need to retain that information for legitimate business or legal purposes.

#### How can you make a privacy complaint?

If you wish to make a complaint, please contact us. Our contact details are at the end of this Policy. We will acknowledge your complaint within 10 working days and will contact you in an attempt to resolve your complaint.

#### We will never sell or rent your personal information to third parties.

We may disclose your personal information to another party where the Privacy Act 2020 permits. Such as when the disclosure directly relates to the purpose, we collected it for customer's instructions, to comply with laws or to enforce our rights, prevent fraud, and for safety.

#### Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

#### **Cookies**

In order to keep the application for VR headset and Facilitator application current, user-oriented and complete, we use Google Analytics and HotJar that allows us to optimize our software to your needs. The information generated for this purpose (including the IP address) is anonymized and is used for understanding how you use our website to enable us to enhance your online experience.

Google Analytics and HotJar use cookies to store that information. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually



modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of our website.

#### **Contact Email**

privacy@skillsvr.com

#### **Address**

The Privacy Officer, SkillsVR, Level 3, 24 Balfour Rd, Parnell, Auckland, New Zealand.

# Changes to the Privacy Policy

We may change this Privacy Policy from time to time by uploading a new version on the website.



# contact@skillsvr.com

San Mateo, California Office 4 W 4th Ave, Suite 403 San Mateo, California, US 94402 +1(650) 740-8598

Auckland Development Office Level 3/24 Balfour Road, Parnell Auckland, New Zealand 1052 0800 020 005