
PRIVACY POLICY

1. INTRODUCTION

This privacy policy applies between you, the visitor to our platform (including our websites and our applications, and whether directly as our customer or as personnel of our customer), and us, the owner and provider of this platform. This privacy policy applies to our use of any and all data collected by us or provided by you in relation to your use of the website and the provision of our services to you.

We take our privacy obligations seriously and we've created this privacy policy to explain how we collect and treat your personal information. Personal information is that information which is identifiable as being about you.

2. LAWS AND STANDARDS WE COMPLY WITH

We comply with:

- (a) the Australian Privacy Principles established by the *Privacy Act 1988* (Cth); and
- (b) to the extent the European Union's *General Data Protection Regulation 2016/679* ('GDPR') applies to us and our use of your information, the GDPR.

3. TYPES OF PERSONAL INFORMATION WE COLLECT

We collect several different types of information to provide Services to you, including:

- (a) **Customer Account and Registration Data:** This includes information you provide to create your account with us and may include first and last name, billing information, password(s), a shipping address, and a valid email address.
- (b) **Service Data (including Session and Usage data):** When you use our Services, we receive information generated through the use of the Service, either entered by you or from the Service Infrastructure itself, (for example, duration of session, connection information, etc.) We may also collect usage and log data about how the services are accessed and used, including information about the device you are using the Services on, IP addresses, location information, language settings, what operating system you are using, unique device identifiers, and other diagnostic data to help us support the Services.
- (c) **Third Party Data:** We may receive information about you from other sources, including publicly available databases or third parties from whom we have purchased data, and combine this data with information we already have about you. We may also receive information from other affiliated companies that are part of our corporate group. This helps us to update, expand, and analyse our records, identify new prospects for marketing, and provide products and services that may be of interest to you.
- (d) **Location Information:** We collect your location-based information for the purpose of providing and supporting the service and for fraud prevention and security monitoring. If you wish to opt-out of the collection and use of your collection information, you may do so by turning it off on your device settings.
- (e) **Device Information:** When you use our Services, we automatically collect information the type of device you use, operating system version, and the device identifier (or "UDID").

4. HOW WE COLLECT PERSONAL INFORMATION

We endeavour to ensure that information we collect is complete, accurate, accessible and not subject to unauthorised access.

We may collect personal information either directly from you, or from third parties, including where you:

- (a) contact us through our website;

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- (b) communicate with us via email, telephone, SMS, social applications (such as LinkedIn, Facebook or Twitter) or otherwise;
 - (c) use our automated referral system or manual referral service;
 - (d) interact with our website, social applications, services, content and advertising; and
 - (e) invest in our business or enquire as to a potential purchase in our business.

We may also collect personal information from you when you use or access our website or our social media pages. This may be done through use of web analytics tools, 'cookies' or other similar tracking technologies that allow us to track and analyse your website usage. Cookies are small files that store information on your computer, mobile phone or other device and enable and allow the creator of the cookie to identify when you visit different websites. Cookies may be used to serve relevant ads to website visitors through third party services such as Google Adwords. These ads may appear on this website or other websites you visit.

If you do not wish information to be stored as a cookie, you can disable cookies in your web browser.

5. USE OF YOUR PERSONAL INFORMATION

We collect and use personal information for the following purposes:

- (a) to provide services or information to you;
- (b) for record keeping and administrative purposes;
- (c) to provide information about you to our contractors, employees, consultants, agents or other third parties for the purpose of providing services to you;
- (d) to improve and optimise our service offering and customer experience;
- (e) to comply with our legal obligations, resolve disputes or enforce our agreements with third parties;
- (f) to send you marketing and promotional messages and other information that may be of interest to you and for the purpose of direct marketing (in accordance with the *Spam Act 2003* (Cth)). In this regard, we may use email, SMS, social media or mail to send you direct marketing communications. You can opt out of receiving marketing materials from us by using the opt-out facility provided (e.g. an unsubscribe link);
- (g) to send you administrative messages, reminders, notices, updates, security alerts, and other information requested by you; and
- (h) to consider an application of employment from you.

Some specific examples of how we may use the information are to:

- (a) Create and administer your account;
- (b) Send you an order confirmation;
- (c) Facilitate and improve the usage of the services you have ordered;
- (d) Assess the needs of your business to determine suitable products;
- (e) Send you product updates, marketing communication, and service information;
- (f) Respond to customer inquiries and support requests;
- (g) Conduct research and analysis;
- (h) Display content based upon your interests; and
- (i) Analyse data, including through automated systems and machine learning to improve our services and/or your experience.

We may disclose your personal information to cloud-providers, contractors and other third parties located inside or outside of Australia. If we do so, we will take reasonable steps to ensure that any overseas recipient deals with such personal information in a manner consistent with how we deal with it.

We've endeavoured to ensure that our use and collection of your data is clear and as transparent as possible, but in the interests of keeping this policy concise it's not possible to list every circumstance in which we will use your data.

We may use third party service providers for disaster recovery services. To the extent necessary to receive those disaster recovery services, we will provide your data to that third party service provider.

We may also use third party service providers to audit the infrastructure and applications we use to store your data. To the extent necessary to receive those audit services, we will provide your data to that third party service provider.

6. ANALYTICS, COOKIES AND OTHER WEBSITE TECHNOLOGIES

Congruent is continuously improving our websites and products through the use of various third party web tools, including analytics and fraud detection, which help us understand how visitors use our websites, desktop applications, and mobile applications, what they like and dislike, and where they may have problems, among other things. While we maintain ownership of this data, we do not share this type of data about individual users with third parties.

- (a) **Geolocation and Other Data:** We may utilize precise Geolocation data but only if you specifically opt-in to collection of that data in connection with a particular service. We also use information such as IP addresses to determine the general geographic locations areas of our visitors. The web beacons used in conjunction with these web analytics tools may gather data such as what browser or operating system a person uses, as well as, domain names, MIME types, and what content, products and services are reviewed or downloaded when visiting or registering for services at one of our websites or using one of our mobile applications.
- (b) **Google Analytics:** We use Google Analytics as described in "How Google uses information from sites or apps that use our Services" available at <https://policies.google.com/technologies/partner-sites?hl=en-US>. You can prevent your data from being used by Google Analytics on websites by installing the Google Analytics opt-out browser add-on available at <https://tools.google.com/dlpage/gaoptout>.
- (c) **Stripe:** We use Stripe services for the processing and management of payments for our Services. Our usage of Stripe may include fraud detection measures. The Stripe Privacy Policy is available at <https://stripe.com/au/privacy>.
- (d) **Tracking Technologies:** Congruent and our partners use cookies and similar tracking technologies to track user traffic patterns and hold certain registration information. Tracking technologies we may also use are beacons, tags and scripts to collect and track information and to improve and analyze our service. The Help menu on the menu bar of most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie and how to disable cookies altogether. You can still view the website if you choose to set your browser to refuse all cookies; however, you must enable cookies to establish an account and to install the Services.
- (e) **Social Media:** Our services include 3rd party social media identity provider services, including Facebook and Google. These identity providers may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. These services will also authenticate your identity and provide you the option to share certain personal information with us such as your name and email address to pre-populate our sign-up form or provide feedback. Your interactions with these features are governed by the privacy policy of the company providing them.

7. COOKIES

Examples of Cookies We May Use

- (a) **Cookie Type: Session Cookies**
 - (i) Purpose: We use these cookies to operate our websites.

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- (ii) Description: Some cookies are essential for the operation of Congruent websites. If a user chooses to disable these cookies, the user will not be able to access all of the content and features.

(b) Cookie Type: Preference Cookies

- (i) Purpose: We use these cookies to remember your preferences.
- (ii) Description: When you register at a Congruent website, we may use cookies to store unique, randomly assigned user IDs that we generate for administrative purposes. These cookies enable you to enter the Congruent sites without having to log on each time.

(c) Cookie Type: Security Cookies

- (i) Purpose: These cookies are used for general security purposes and user authentication.
- (ii) Description: We use security cookies to authenticate users, prevent fraudulent use of login credentials, prevent fraudulent payments, and protect user data from access by unauthorized parties.

8. SECURITY

We take reasonable steps to ensure your personal information is secure and protected from misuse or unauthorised access. Our information technology systems are password protected, and we use a range of administrative and technical measure to protect these systems. However, we cannot guarantee the security of your personal information.

9. LINKS

Our website may contain links to other websites. Those links are provided for convenience and may not remain current or be maintained. We are not responsible for the privacy practices of those linked websites and we suggest you review the privacy policies of those websites before using them.

10. INFORMATION SHARING

Ensuring your privacy is important to us. We do not share your personal information with third parties except as described in this privacy policy. We may share your personal information with (a) third party service providers; (b) business partners; (c) affiliated companies within our corporate structure and (d) as needed for legal purposes. Third party service providers have access to personal information only as needed to perform their functions and they must process the personal information in accordance with this Privacy Policy.

Examples of how we may share information with service providers include:

- (a) Fulfilling orders and providing the services to you and others;
- (b) Payment processing and fraud prevention;
- (c) Providing customer support;
- (d) Sending marketing communications;
- (e) Conducting research and analysis; and
- (f) Utilising cloud computing infrastructure.

We may also disclose your personal information to any third party with your prior consent.

11. REQUESTING ACCESS OR CORRECTING YOUR PERSONAL INFORMATION

If you wish to request access to the personal information we hold about you, please contact us using the contact details set out below including your name and contact details. We may need to verify your identity before providing you with your personal information. In some cases, we may be unable to provide you with access to all your personal information and where this occurs, we will explain why. We will deal with all requests for access to personal information within a reasonable timeframe.

Where you are a resident of the European Union and the GDPR applies to your personal information, you have the right to ask for 'subject access request' or 'SAR' being a copy of your personal data held by us. Where we do hold such data about you we will provide you with a copy of the data we hold about you. This will be in a commonly used machine-readable file where you request us to e-mail the information to you. We will also give you a description of the data, tell you why we are holding it and tell you who we could have disclosed it to.

If you think that any personal information we hold about you is inaccurate, please contact us using the contact details set out below and we will take reasonable steps to ensure that it is corrected. We will also stop processing data on your request and you may also request that we delete the data held about you.

If you would like a copy of the information which we hold about you or believe that any information we hold on you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us at support@signata.net.

We reserve the right to refuse to provide you with information that we hold about you, in certain circumstances set out in the *Privacy Act 1988* (Cth).

12. CHANGE OF CONTROL

If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our user databases, together with any personal information and non-personal information contained in those databases. This information may be disclosed to a potential purchaser under an agreement to maintain confidentiality. We would seek to only disclose information in good faith and where required by any of the above circumstances.

13. TRANSFERS OUTSIDE THE EUROPEAN ECONOMIC AREA ('EEA')

Information that we collect in the EEA may from time to time be stored, processed in or transferred between parties located in countries outside of the EEA which may not have as stringent data protection laws as found in the EEA.

Some of our third party service providers may be also located outside the EEA. If we transfer your data outside the EEA in this way (where you are a resident of the European Union and the GDPR applies to your personal information) we will ensure that the third party provider we use is compliant with the GDPR and that your privacy continues to be protected as outlined in this privacy policy.

If Article 27 of the GDPR applies to us, we will appoint a representative within the European Union in accordance with the GDPR. Please contact us and we will let you know the representative's contact details.

14. COMPLAINTS

If you wish to complain about how we handle your personal information or information held by us, please contact us using the details set out below including your name and contact details. We will investigate your complaint promptly and respond to you within a reasonable time.

For data which is subject to the GDPR, you have the right to lodge a complaint with the local regulator in your jurisdiction in Europe if you do not feel we have adequately upheld your rights under GDPR.

15. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy to reflect changes to our information practices. If we make any material changes we will provide notice on this website, and we may notify you by email (sent to the email address specified in your account), prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices. If you continue to use the Services after those changes are in effect, you agree to the revised policy.

16. CONTACT US

For further information about our privacy policy or practices, or to access or correct your personal information, or make a complaint, please contact us using the details set out below:

Email: support@signata.net.

By providing personal information to us, you consent to our storage, maintenance, use and disclosing of personal information in accordance with this privacy policy.