

# Privacy Policy

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# Privacy Policy

This privacy policy (hereinafter "Privacy Policy") applies to the personal information we collect and the protection of your privacy when you interact with PROJECTAI ASIA-PACIFIC PTY LTD (ProjectAI), and in particular while you use our website(s), hereinafter referred to as "the website".

In addition to the collection of personal information obtained by ProjectAI through other means, including but not limited to face-to-face meetings, events and conferences, or third-party referrals, the Privacy Policy applies to any use and interaction with the ProjectAI websites. Websites are located at [www.projectai.com](http://www.projectai.com) as well as any website which provides a link or reference to this Privacy Policy.

The website is owned and operated by: PROJECTAI ASIA-PACIFIC PTY LTD (ACN 618 485 653) (hereinafter "we" or "us").

We are committed to the protection of your privacy. We take your privacy very seriously so we urge you to read this policy very carefully because it contains important information about:

- who we are;
- how and why we collect, store, use and share personal information;
- your rights in relation to your personal information, and
- how to contact us in the event that you have a complaint.

## Interpretation

In this Privacy Policy, unless the context otherwise requires, the following rules of interpretation shall apply:

- a) Words referring to one gender include every other gender.
- b) Words referring to a singular number include the plural, and words referring to a plural include the singular.
- c) Words referring to a person or persons include companies, firms, corporations, organisations and vice versa.
- d) Headings and titles are included in this Privacy Policy for convenience only and shall not affect the interpretation of this Privacy Policy.
- e) Each Party must, at its own expense, take all reasonable steps and do all that is reasonably necessary to give full effect to this Privacy Policy and the events contemplated by it.
- f) Any obligation on a Party not to do something includes an obligation not to allow that thing to be done.

## Who We Are

We collect, use and are responsible for certain personal information about you. When we do so we are regulated under Australian privacy laws. We may also be regulated by the General Data Protection Regulations ("GDPR") which apply across the European Union ("EU"), including the United Kingdom ("UK") and we may be responsible as "controller" of that personal information for the purposes of those laws.

## Collection of Personal Information

We collect personal information in a number of ways when we interact with you. This section provides further information about the information we collect, how we collect it, and the purposes for which we collect it.

## Personal information you provide to us

- a) We collect the following personal information that you provide to us:
  - i. First Name
  - ii. Last Name
  - iii. Company Name
  - iv. Job Title
  - v. Telephone number
  - vi. E-Mail Address
- b) We collect this information from your interaction with the website including:
  - i. Electronic or 'web forms'
  - ii. Webinar registration forms
  - iii. Event registration forms
- c) We collect this information for the purposes of facilitating the use of our products, for marketing communications about ProjectAI, our products or services, events and our partner/vendor products, services or events.

## Cookies and similar technologies when using our website

A cookie is a small text file which is placed onto your computer or electronic device when you access our website. Such technologies can be used to track users' actions and activities, and to store information about them. We may use these cookies and/or similar technologies on this website.

This information helps us to build a profile of our users. Some of this information may be aggregated or statistical, which means that we will not be able to identify you individually.

In addition, it should be noted that in some cases our cookies or similar technologies may be owned and controlled by third parties who will also collect personal information about you.

On the first occasion that you use our website we will ask whether you consent to our use of cookies. If you do not, cookies will not be used. Thereafter you can opt-out of using cookies at any time or you can set your browser not to accept cookies and the websites below tell you how to remove cookies from your browser. However, some of our website features may not function as a result.

## Marketing

We would like to send you information about products, services, events, offers and our business which may be of interest to you. Such information could be sent by post, email, telephone or text message.

We will ask whether you would like us to send you marketing messages on the first occasion that you provide any relevant contact information. If you do opt in to receive such marketing from us you can opt out at any time. If you have any queries about how to opt out, or if you are receiving information that you do not want you can contact us using the details provided below.

## Email Opt-in/Out

If you receive an email from us and would prefer not to receive such correspondence in the future, you may follow the instructions in the email to opt out of future correspondence. You may also contact us, using the details at the bottom of this Privacy Policy, in order to opt out of future correspondence. We will make all reasonable efforts to promptly comply with your requests. However, you may receive subsequent correspondence from us while your request is being handled.

## Combining Information

We may combine, link or aggregate some of your information in order to obtain a better understanding of your requirements. This may enable us to better design our events, communications or website and may also assist with our business or administration requirements.

We may also share aggregated information with third parties but only if that aggregated information does not contain any information that identifies you personally.

## Who Your Information May Be Shared With

We may provide some of your personal information from time to time to our trusted third-party service providers, vendors, suppliers and partners so that they can help us to serve you.

We may use third-party service providers to assist with information storage (such as cloud storage).

We may provide some of your personal information to third-party service providers for the purpose of analysing data or tracking usage. For example, we may use these services to find out where page requests come from, dates and times of page requests, details of any website that referred you to the website and other details about your usage of the website. This information enables us to understand patterns of usage of the website, and to improve the website.

We may use third-party service providers to host the website. If this occurs, that third party service provider is likely to have access to some of your personal information.

We may allow third-parties to advertise or promote events on the website. These third parties may use cookies in connection with their advertisements (see the "Cookies and similar technologies" clause in this Privacy Policy).

However, we only share your personal information with a third-party service provider if that provider agrees to our privacy standards as set out in this Privacy Policy or has evidenced that it has substantially similar controls in place to handle personal information.

Notwithstanding the other provisions of this Privacy Policy, we may provide your personal information to a third-party or to third parties in order to protect the rights, property or safety, of us, our customers or third parties, or as otherwise required by law.

We will not knowingly share your personal information with any third-parties other than in accordance with this Privacy Policy.

If your personal information might be provided to a third-party in a manner which is other than as explained in this Privacy Policy, you will be notified. You will also have the opportunity to request us not to share that information.

We promise not to sell or rent your personal information to anyone else.

## Related Entities

We may share your personal information, including personal information that identifies you personally, with any of our parent companies, subsidiary companies, affiliates or other trusted related entities.

However, we only share your personal information with a trusted related entity if that entity agrees to our privacy standards as set out in this Privacy Policy.

## Storage Of Your Personal Information

Your personal information will be kept, in a form which permits your identification, for no longer than is necessary for the purposes which we have described in this Privacy Policy.

Notwithstanding the preceding sub-clause, your personal information may be stored for longer periods insofar as the personal information will be processed solely for archiving purposes in the public interest, historical research purposes or statistical purposes.

## Reasons We Can Collect And Use Your Personal Information

We rely on the following as the lawful basis on which we collect and use your personal information:

- a) legal obligation: the processing is necessary for us to comply with the law (not including contractual obligations);
- b) consent: you have given clear consent to us to process your personal data for a specific purpose; and
- c) legitimate interests: the processing is necessary for our legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect your personal data which overrides those legitimate interests.

## Keeping Your Information Secure

By continuing to use the website, you agree to the terms of this Privacy Policy. You acknowledge, agree and accept that no transmission of information or data via the internet, or electronic storage of data, is completely secure. You acknowledge, agree and accept that we do not guarantee or warrant the security of any information that you provide to us, and that you transmit such information at your own risk. However, we take the protection and storage of your personal information very seriously.

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We will also use technological and organisation measures to keep your information secure.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

While we will use all reasonable efforts to secure your personal data, in using the website you acknowledge that the use of the internet is not completely secure and for this reason we cannot guarantee the security or integrity of any personal data that are transferred from you or to you via the internet. If you have any particular concerns about your information, please contact us using the details below.

## Protecting User Confidentiality

Protecting the data of our customers and the users of our products is at the heart of everything we do. It is only through maintaining the confidentiality of users that we are able to develop the trust needed to collect honest feedback to provide project managers with the insights needed to make important decisions.

All of the feedback and comments provided by users are combined and presented in an aggregated and confidential form.

### What is ProjectAI's policy for revealing the identify of a user?

We will only reveal the identity of a user in exceptional circumstances, and where there is a lawful and legitimate basis for doing so. For example, we may consider (based on comments left by a user) that a user is experiencing, or at risk of physical, mental or emotional harm (including self-harm) and requires support. There may also be times when we could reveal the identify of a user to prevent or detect an unlawful act (such as fraud or other criminal act).

Apart from these exceptional circumstances, we do not provide customers with access to raw user data (the responses to Pulse surveys alongside the personal information of the user) – which helps us to maintain the trust of our users and customers using the platform.

We only reveal identity when a request is considered in line with our policy on revealing confidentiality, and refers to a circumstance where the employee in question is experiencing or at risk of physical, mental or emotional harm and requires support. We have an escalation process and approval workflow to ensure that we handle identity requests in a responsive and rigorous way that prioritises the best interests of the respondent.

## Limitation of Liability

By continuing to use the website, you acknowledge, agree and accept that in no event will ProjectAI or its subcontractors be liable for any loss or damages, including incidental, consequential, indirect or special damages, resulting from any data provided on the website (including, but not limited to modification or termination of employment, modification or cancellation of a contract, or any other financial or reputational impact resulting from the information provided by users.)

## Transfers Of Your Information To Other Jurisdictions

Our business is based in Australia. We may need to share some of the information that we collect about you with organisations both inside and outside Australia. In some cases, we may need to ask you before we do this.

Australia has strict data protection laws but they vary in some respects from the data protection laws in the UK and the European Economic Area ('EEA').

If we transfer, share, store or handle your information outside of the UK or the EEA, it will only be done with relevant protections in place. We will take steps to ensure that your information will be protected in accordance with applicable data protection laws and in accordance with legally recognised data transfer mechanisms.

Any transfers to these countries will be undertaken on the basis that the country, territory or one or more specific sectors in that country, or an international organisation ensures an adequate level of protection.

## Accessing, Updating And Correcting Your Personal Information

We are committed to ensuring that any of your personal information which we are holding is accurate and kept up to date.

We will take all reasonable steps to ensure that personal information which is inaccurate (having regard to the purposes for which it was processed) is erased or rectified without delay.

You have the right to request access to any of your personal information which we are holding.

You have the right to request that any of your personal information which we are holding be updated or corrected.

In order to request access, an update or a correction to your personal information, you may contact us using the details at the end of this Privacy Policy.

## Governing Law

This Privacy Policy is subject to the laws of Western Australia, Australia and each party submits to the jurisdiction of the courts of Western Australia, Australia.

## How To Complain

We take customer satisfaction very seriously. If you have a complaint in relation to our handling of your personal information, we will endeavour to handle it promptly and fairly. If you have a complaint in relation to our handling of your personal information, please email [info@projectai.com](mailto:info@projectai.com) in the first instance.

## Changes To the Privacy Policy

We may change this Privacy Policy from time to time.

You should check this Privacy Policy occasionally to ensure you are aware of the most recent version that will apply each time you access this website. An updated Privacy Policy will also be made available to you on request.

## Contact Us

If you have any questions about this Privacy Policy or regarding the information we hold about you, please email [info@projectai.com](mailto:info@projectai.com)