

SQUIDLY PRIVACY POLICY

Last updated: February 23, 2025

Squid Eye Pty Ltd (ABN 18 666 550 947) (**Squidly, we, us or our**), understands that protecting your personal information is important. This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or collected by us, when interacting with you.

This Privacy Policy takes into account the requirements of the *Privacy Act 1988* (Cth) and the Australian Privacy Principles, as well as the *New Zealand Privacy Act 2020* and the *Information Privacy Principles*.

In addition to the Australian laws, individuals located in the European Union or European Economic Area (**EU**) may also have rights under the *General Data Protection Regulation 2016/679* and individuals located in the United Kingdom (**UK**) may have rights under the General Data Protection Regulation (EU) 2016/679 (UK GDPR) and the Data Protection Act 2018 (DPA 2018) (together, the **GDPR**). **Appendix 1** outlines the details of the additional rights of individuals located in the EU and UK as well as information on how we process the personal information of individuals located in the EU and UK.

In addition to the Australian laws, individuals located in the United States of America (**USA**) may also have privacy rights. **Appendix 2** outlines the details of the additional rights of individuals located in the USA as well as information on how we process the personal information of individuals located in the USA.

1. The Information We Collect

Personal information: is information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable.

The types of personal information we may collect about you include:

- **Identity Data** including your name, age, profession, photographic identification.
- **Contact Data** including your telephone number, address and email.
- **Financial Data** including bank account and payment card details (through our third-party payment processor, who stores such information and we do not have access to that information).
- **Transaction Data** including details about payments to you from us and from you to us.
- **Technical and Usage Data** when you access any of our websites or platforms, details about your internet protocol (IP) address, login data, browser session and geo-location data, statistics on page views and sessions, device and network information,

acquisition sources, search queries and/or browsing behaviour, access and use of our website (including through the use of Internet cookies), and communications with our website.

- **Profile Data** including your username and password for our platform Squidly, profile picture and support requests you have made.
- **Interaction Data** including information you provide to us when you participate in any interactive features, including surveys.
- **Marketing and Communications Data** including your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Professional data** including where you are a worker of ours or applying for a role with us, your professional history such as your previous positions and professional experience, or whether you hold required authorisations or licences.

2. How We Collect Personal Information

We collect personal information in a variety of ways, including:

- when you provide it directly to us, including face-to-face, over the phone, over email, online, or via the platform;
- when you complete a form or input field on the platform;
- when you use any website we operate (such as our platform and website) (including from any analytics and cookie providers or marketing providers. See the "Cookies" section below for more detail on the use of cookies);
- from third parties, including:
 - if you apply for a role with us, such as your referees;
- from publicly available sources.

3. Why We Collect, Hold, Use and Disclose Personal Information

We have set out below a description of the purposes for which we plan to collect, hold, use and disclose your personal information.

- To enable you to access and use our software, including to provide you with a login.
- To work with you as a customer or supplier of our business including to assess your application, manage your use of our platform.
- To contact and communicate with you about our business, including in response to any support requests you lodge with us or other enquiries you make with us.

- To contact and communicate with you about any enquiries you make with us via any website we operate.
- For internal record keeping, administrative, invoicing and billing purposes.
- For analytics, market research and business development, including to operate and improve our business, associated applications and associated social media platforms.
- For advertising and marketing, including to send you promotional information about our events and experiences and information that we consider may be of interest to you.
- To offer additional benefits to you.
- If you have applied for employment with us, to consider your employment application.
- Where you use our platform Squidly to provide services.
- Where you use our platform Squidly to access services.
- To comply with our legal obligations or if otherwise required or authorised by law.

4. Our Disclosures of Personal Information to Third Parties

Personal information: We will only disclose personal information (excluding sensitive information) to third parties where it is necessary as part of our business, where we have your consent, or where permitted by law. This means that we may disclose personal information (excluding sensitive information) to:

- our employees, contractors and/or related entities;
- IT service providers, data storage, web-hosting and server providers (including: our hosting provider (as at the date of this policy – GCP, AWS, Twilio), our email service provider (as at the date of this policy - Microsoft), & our CRM database provide (as at the date of this policy - GCP);
- marketing or advertising providers;
- professional advisors, bankers, auditors, our insurers and insurance brokers;
- payment systems operators or processors (currently Stripe);
- our existing or potential agents or business partners;
- if we merge with, or are acquired by, another company, or sell all or a portion of our assets, your personal information may be disclosed to our advisers and any prospective purchaser's advisers and may be among the assets transferred;

- courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;
- third parties to collect and process data, such as analytics providers and cookies (including: GCP); and
- any other third parties as required or permitted by law, such as where we receive a subpoena.

5. Your Rights and Controlling Your Personal Information

Your choice: Please read this Privacy Policy carefully. If you provide personal information to us, you understand we will collect, hold, use and disclose your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us, however, if you do not, it may affect our ability to work with you as a customer or supplier of our business.

Information from third parties: If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

Restrict and unsubscribe: To object to processing for direct marketing/unsubscribe from our email database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

Access: You may request access to the personal information that we hold about you. An administrative fee may be payable for the provision of such information. Please note, in some situations, we may be legally permitted to withhold access to your personal information. If we cannot provide access to your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal. If we can provide access to your information in another form that still meets your needs, then we will take reasonable steps to give you such access.

Correction: If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to promptly correct any information found to be inaccurate, out of date, incomplete, irrelevant or misleading. Please note, in some situations, we may be legally permitted to not correct your personal information. If we cannot correct your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal.

Complaints: If you wish to make a complaint, please contact us using the details below and provide us with full details of the complaint. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take in response to your complaint. If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner (if you are an Australian resident), or the Office of the New Zealand Privacy Commissioner (if you are a New Zealand resident).

6. Storage and Security

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures, to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

While we are committed to security, we cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk.

7. User-Generated Content

We may enable you to post reviews, comments, photos and other user-generated content. Any content you choose to submit will be accessible by anyone, including third parties not associated with us. We have no control over how others may use or misuse information you make publicly available. We are not responsible for the privacy, security or accuracy of any user-generated content you choose to post or for the use or misuse of that information by any third parties.

8. Cookies and Analytics

We may use cookies on our website from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do recognise you when you return to our online website and allow third parties to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. If and when you choose to provide our online website with personal information, this information may be linked to the data stored in the cookie.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

Google Analytics: We may use Google Analytics Advertising Features. We and third-party vendors may use first-party cookies (such as the Google Analytics cookie) or other first-party identifiers, and third-party cookies (such as Google advertising cookies) or other third-party identifiers together. These cookies and identifiers may collect Technical and Usage Data about you.

You can opt-out of Google Analytics Advertising Features including using a Google Analytics Opt-out Browser add-on found [here](#). To opt-out of personalised ad delivery on the Google content network, please visit Google's Ads Preferences Manager [here](#) or if you wish to opt-out permanently even when all cookies are deleted from your browser you can install their plugin [here](#). To opt out of interest-based ads on mobile devices, please follow these instructions for your mobile device: On android open the Google Settings app on your device and select "ads" to control the settings. On iOS devices with iOS 6 and above use Apple's advertising identifier. To learn more about limiting ad tracking using this identifier, visit the settings menu on your device.

To find out how Google uses data when you use third party websites or applications, please see [here](#).

9. Links to Other Websites

Our website may contain links to other party's websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

10. Use of Location Services Data

We do not seek to specifically collect or identify your location but location data may be available via your IP address for the following purposes:

- for security and safety; and
- to prevent and detect fraud.

We collect this information when you use our platform. If you do not want us to use your location for the purposes above, you should turn off the location services.

11. Amendments

We may, at any time and at our discretion, vary this Privacy Policy by publishing the amended Privacy Policy on our website. We recommend you check our website regularly to ensure you are aware of our current Privacy Policy.

For any questions or notices, please contact us at:

Squid Eye Pty Ltd (ABN 18 666 550 947)

Email: support@squidly.com.au

Last updated: 23 February 2025

Appendix 1: Privacy Policy | Additional Rights and Information for Individuals Located in the EU or UK

Under the GDPR individuals located in the EU and the UK have extra rights which apply to their personal information. Personal information under the GDPR is often referred to as personal data and is defined as information relating to an identified or identifiable natural person (individual). This Appendix 1 sets out the additional rights we give to individuals located in the EU and UK, as well as information on how we process the personal information of individuals located in the EU and UK. Please read the Privacy Policy above and this Appendix carefully and contact us at the details at the end of the Privacy Policy if you have any questions.

What personal information is relevant?

This Appendix applies to the personal information set out in the Privacy Policy above.

Purposes and legal bases for processing

We collect and process personal information about you only where we have legal bases for doing so under applicable laws. We have set out below, in a table format, a description of all the ways we plan to use your personal information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal information for more than one lawful ground depending on the specific purpose for which we are using your data. Please reach out to us if you need further details about the specific legal ground, we are relying on to process your personal information where more than one ground has been set out in the table below.

<i>Purpose of use / disclosure</i>	<i>Type of Data</i>	<i>Legal Basis for processing</i>
To enable you to access and use our software, including to provide you with a login	<ul style="list-style-type: none">• Identity Data• Contact Data	<ul style="list-style-type: none">• Performance of a contract with you
To assess whether to take you on as a new client	<ul style="list-style-type: none">• Identity Data• Contact Data	<ul style="list-style-type: none">• Performance of a contract with you• To comply with a legal obligation
To work with you as a customer or supplier of our business, including to manage your appointments	<ul style="list-style-type: none">• Identity Data• Contact Data	<ul style="list-style-type: none">• Performance of a contract with you
To contact and communicate with you about our business, including in response to any	<ul style="list-style-type: none">• Identity Data• Contact Data• Profile Data	<ul style="list-style-type: none">• Performance of a contract with you

support requests you lodge with us or other enquiries you make with us.		
To contact and communicate with you about any enquiries you make with us via our website.	<ul style="list-style-type: none"> • Identity Data • Contact Data 	<ul style="list-style-type: none"> • Legitimate interests: to ensure we provide the best client experience we can offer by answering all of your questions
For internal record keeping, administrative, invoicing and billing purposes.	<ul style="list-style-type: none"> • Identity Data • Contact Data • Financial Data • Transactional Data 	<ul style="list-style-type: none"> • Performance of a contract with you • To comply with a legal obligation • Legitimate interests: to recover debts due to us and ensure we can notify you about changes to our terms of business and any other administrative points
For analytics, market research and business development, including to operate and improve our business, associated applications and associated social media platforms.	<ul style="list-style-type: none"> • Profile Data • Technical and Usage Data 	<ul style="list-style-type: none"> • Legitimate interests: to keep our website updated and relevant, to develop our business, improve our business and to inform our marketing strategy
For advertising and marketing, including to send you promotional information about our events and experiences and information that we consider may be of interest to you.	<ul style="list-style-type: none"> • Identity Data • Contact Data • Technical and Usage Data • Profile Data 	<ul style="list-style-type: none"> • Legitimate interests: to develop and grow our business

	<ul style="list-style-type: none"> Marketing and Communications Data 	
To offer additional benefits to you.	<ul style="list-style-type: none"> Identity Data Contact Data Profile Data Interaction Data Marketing and Communication Data 	<ul style="list-style-type: none"> Legitimate interests: to facilitate engagement with our business and grow our business
If you have applied for employment with us, to consider you employment application.	<ul style="list-style-type: none"> Identity Data Contact Data Professional Data 	<ul style="list-style-type: none"> Legitimate interests: to consider your employment application
Where you use our platform Squidly to provide services.	<ul style="list-style-type: none"> Technical and Usage Data Profile Data Professional Data 	<ul style="list-style-type: none"> Performance of a contract with you To comply with a legal obligation
Where you use our platform Squidly to access services	<ul style="list-style-type: none"> Technical and Usage Data Profile Data 	<ul style="list-style-type: none"> Performance of a contract with you To comply with a legal obligation
To comply with our legal obligations or if otherwise required or authorised by law.		<ul style="list-style-type: none"> To comply with a legal obligation

If you have consented to our use of data about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your data because we or a third party have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer doing business with us. Further information about your rights is available below.

Data Transfers

The privacy protections available in the countries to which we send data for the purposes listed above may be less comprehensive than what is offered in the country in which you initially provided the information. Where we transfer your personal information outside of the country where you are based, we will perform those transfers using appropriate safeguards in accordance with the requirements of applicable data protection laws and we will protect the transferred personal information in accordance with this Privacy Policy and Appendix 1. This includes:

- only transferring your personal information to countries that have been deemed by applicable data protection laws to provide an adequate level of protection for personal information; or
- including standard contractual clauses in our agreements with third parties that are overseas.

Data Retention

We will only retain your personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Extra rights for EU and UK individuals

You may request details of the personal information that we hold about you and how we process it (commonly known as a “data subject request”). You may also have a right in accordance with applicable data protection law to have your personal information rectified or deleted, to restrict our processing of that information, to object to decisions being made based on automated processing where the decision will produce a legal effect or a similarly significant effect on you, to stop unauthorised transfers of your personal information to a third party and, in some circumstances, to have personal information relating to you transferred to you or another organisation.

If you are not happy with how we are processing your personal information, you have the right to make a complaint at any time to the relevant Data Protection Authority based on where you live. We would, however, appreciate the chance to deal with your concerns before you approach the Data Protection Authority, so please contact us in the first instance using the details set out above in our Privacy Policy.

For any questions or notices, please contact us at:

Data Privacy Officer (support@squidly.com.au)

Appendix 2: Privacy Policy | Additional Rights and Information for Individuals Located in the USA

Individuals located in the USA may have extra rights which apply to their personal information. This Appendix 2 sets out the additional rights we give to individuals located in the USA, as well as information on how we process the personal information of individuals located in the USA. Please read the Privacy Policy above and this Appendix carefully and contact us at the details at the end of the Privacy Policy if you have any questions.

Disclosure

In the case of our clients who are located in USA, we store your personal information in USA. Where we disclose your personal information to third parties, those third parties may store, transfer or access personal information outside of USA.

Your California Privacy Rights

California residents have the right to request information regarding third parties to whom Squidly has disclosed certain categories of personal information during the preceding year for those third parties' direct marketing purposes under California's "Shine the Light" Law.

Personal information under this California law means any information that identified, described, or was able to be associated with an individual at the time of disclosure.

We do not disclose this type of personal information to third parties for their own purposes, and we permit you to opt-out of any disclosures of non-identifiable personal information.

However, if you are a California resident and would like to inquire further, please contact us using the information provided below. You must include your full name, email address and postal address in your email or mail request so that we can verify your California residence and respond.

Currently, we do not monitor or take any action with respect to signals or other mechanisms for the expression of consumer choice regarding the collection of information about an individual consumer's online activities over time and across third-party websites or online services (e.g., browser do not track signals).

Your Nevada Privacy Rights

Nevada residents have the right to request to opt out of any "sale" of their personal information under Nevada SB 220.

While we do not sell any of your personal information, Nevada law allows you to request to opt out of the future sale of your personal information.

If you are a Nevada resident and would like to make such a request, please contact us using the information below. You must include your full name, email address and postal address in your email or mail request so that we can verify your Nevada residence and respond. In the event we sell your personal information after the receipt of your request, we will make reasonable efforts to comply with such request.

Use by children

Our website is not directed toward individuals under the age of 13 ("**Children**"). We do not knowingly collect personal information from Children, and no personal information should be submitted to our website by Children.

You must be old enough to consent to the processing of your personal information in your country, and you must be at least 18 years of age to use our platform as a provider.

Our platform may be used by Children who wish to access services offered by our clients.

If we have collected or received personal information from a Child, we will delete that personal information as permitted by law.

If you believe we may have any collected personal information from a child under the age of 13 without parental consent, please submit a written request via the email to support@squidly.com.au.

For any questions or notices, please contact us at:

Data Privacy Officer (support@squidly.com.au)