

ACE ACADEMY PRIVACY POLICY

Ace Academy AU (ABN 34 280 324 637) is committed to providing quality services and products to you and this outlines our ongoing obligations to you in respect on how we manage and protect your personal information. We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 which govern the way in which we collect, use, disclose, store, secure and dispose of your personal information.

Ace Academy (“us”, “we”, or “our”) operates under <https://aceacademy.com.au> and respective domain names. We are committed to protect your personal information collected through this website and respective domains. By using this site(s), you agree to the collection and use of information in accordance with this policy.

Please read this Privacy Policy carefully. Please contact us if you have any questions – our contact details are detailed at the end of this Privacy Policy.

1. Personal Information

- 1.1. Ace Academy is a specialist tuition company providing both products and services to students and scholars in their required fields. Ace Academy may directly or indirectly collect personal information in the ordinary course of conducting its business as set out below.
- 1.2. Ace Academy generally collects and holds personal information on our customers about:
 - 1.2.1. Name;
 - 1.2.2. Date of birth;
 - 1.2.3. Name of legal guardian (if any);
 - 1.2.4. Images;
 - 1.2.5. Contact details, including email addresses and telephone number(s);
 - 1.2.6. Academic and vocational transcripts;
 - 1.2.7. Resumes;
 - 1.2.8. Payment information;
 - 1.2.9. Demographic information, including home address and postcodes;
 - 1.2.10. Preferences and opinions in relation to education;
 - 1.2.11. Any other information requested by our website or otherwise requested by us or provided by you.

2. Collection and Use of Personal Information

2.1. We collect and use the information for the following purposes:

- 2.1.1. Means of contact and communication with you;
- 2.1.2. Processing payments and invoicing;
- 2.1.3. Internal record keeping;
- 2.1.4. Market research and business development;
- 2.1.5. Discount eligibility and offers;
- 2.1.6. Promotional information about our services and products and/or about third parties we think that may be of interest to you;
- 2.1.7. Data analytics purposes;
- 2.1.8. Comply with legal obligations and for the purposes authorized by laws or regulations;

2.2. All bank account and credit card particulars will be securely encrypted and stored in our system for the purposes of processing payments. We adhere to PCI Security Standards Council standards when handling payment information. We have processes in place to ensure the security of your personal information, including encryption of data when it is transferred to our service providers and limitations on access to personal information within our organization. We do not retain or store CVV numbers;

3. Disclosure of Personal Information to Third Parties

3.1. We may disclose personal information in regards to:

- 3.1.1. Credit reporting agencies and courts, tribunals and regulatory authorities where customers fail to pay for goods and services provided by us to them;
- 3.1.2. Courts, tribunals, regulatory authorities and law enforcement officers as required by law, in connect with any authentic or prospective legal proceedings, or in order to establish, exercise or defend our legal rights.
- 3.1.3. Third parties, including agents or contracts, who assist us in providing information, products, services or direct marketing to you. These may include parties located, or that store data, outside Australia; and
- 3.1.4. Third parties to collect and process data including Google Analytics or other relevant business. These also may include parties located, or that store data outside of Australia;

3.2. When disclosing your personal information to third parties for these purposes, we will request that the third party follow this Privacy Policy regarding handling your personal information.

3.3. If there is a change of control of our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible by law our user databases, together with any personal information and non-personal information contained in those databases.

4. Sensitive Information

- 4.1. Sensitive information is a subset of personal information given by the Australian Privacy Principles with a higher level of protection. Referring to 'sensitive information' implies information relating to your racial or ethnic background, political opinions, ethnicity, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation or behaviours' and criminal records, health information, or biometric information.
- 4.2. The type of sensitive information we may collect includes but not limited to:
 - 4.2.1. Racial and/or ethnic origin;
 - 4.2.2. Health information;
 - 4.2.3. Other sensitive information you or your legal guardian (if applicable) supply and/or make available to us;
- 4.3. The sensitive information will be used and disclosed for the purposes relating to the primary purpose for which the sensitive information was collected including:
 - 4.3.1. Providing services and/or goods to you;
 - 4.3.2. Assess your suitability to receive our services and/or goods;
 - 4.3.3. To facilitate your receiving urgent medical attention, if required or during emergencies;
- 4.4. Your sensitive information may also be used or disclosed if required or authorized by law;

5. Access to your Personal Information

- 5.1. You may obtain access to any personal information which Ace Academy holds about you, unless one of the exceptions applies including:
 - 5.1.1. Providing access is likely to pose a serious threat to the safety of an individual or the public;
 - 5.1.2. Providing access is likely to unreasonably impact the privacy of others;
 - 5.1.3. The request for access is frivolous or vexatious;
 - 5.1.4. Providing access would reveal information which relates to existing or anticipated legal proceedings or would otherwise impact on any negotiations;
 - 5.1.5. Providing access is unlawful (including being unlawful as directed by a court or tribunal order) or is likely to impact on actions being taken in relation to alleged unlawful activities relating to our functions and activities; or
 - 5.1.6. Granting access would impact on a commercially sensitive decision-making process;
- 5.2. You may choose to restrict the collection or use of your personal information. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by contacting us at the email address listed in this Privacy Policy.
- 5.3. An administrative fee may be payable for the provision of information. We may refuse to provide you with information that we hold about you, in certain circumstances set out in the Privacy Act.

- 5.4. If you believe that any information, we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us by email. We rely in part upon customers advising us when their personal information changes. We will respond to any request within a reasonable time. We will endeavor to promptly correct any information found to be inaccurate, incomplete or out of date.
- 5.5. If you believe that we have breached the Australian Privacy Principles and wish to make a complaint about that breach, please contact us by email setting out details of the breach. We will promptly investigate your complaint and respond to you in writing setting out the outcome of our investigation, what steps we propose to take to remedy the breach and any other action we will take to deal with your complaint.

6. Storage and Security

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

7. Cookies and Web Beacon

- 7.1. Cookies are small text files which are transferred to the hard drive of your computer to provide additional functionality to the Ace Academy website and to help Ace Academy analyse usage of the Ace Academy website. Cookies can identify an individual's web browser but not an individual himself or herself. If you wish, you can disable your web browser from accepting cookies. If you disable cookies, you will still be able to access the Ace Academy website but may not be able to access all of Ace Academy services.
- 7.2. Web beacons are small pieces of code placed on a web page to monitor the visitors' behavior and collect data about the visitors viewing a web page. For example, web beacons can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page.
- 7.3. We may use Google Analytics to collect and process data. To find out how Google uses data when you use third party websites or applications, please see www.google.com/policies/privacy/partners/ or any other URL Google may use from time to time.

8. External Links

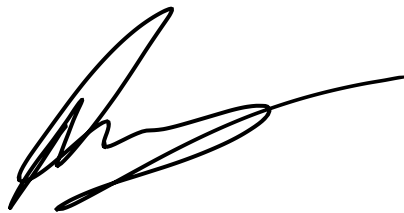
- 8.1. Our website(s) may contain other external links to websites not affiliated with Ace Academy. These links included in our website(s) does not necessarily imply that Ace Academy endorses, agrees or attests to the factuality, legality and correctness of its contents.
- 8.2. We do not have any control over those websites and are not responsible or liable for the protection and privacy of any information you provide whilst visiting such websites(s) and as such, not governed by this Privacy Policy.

9. Policy Updates

- 9.1. This Privacy Policy will be reviewed from time to time to take account of the ever-changing laws and technology changes to our operations and practices within our business environment.
- 9.2. All personal information held with Ace Academy will be governed by Ace Academy's most recent policy. Changes to this Privacy Policy will be published by posting an updated Privacy Policy on the Ace Academy website.
- 9.3. You should review Ace Academy's Privacy Policy regularly to ensure you are familiar with any changes. If you are unsure whether you are reading the most recent version, please do not hesitate to contact us.
- 9.4. Your continued use of the Ace Academy website and its respective domains, services and products after any changes to this Privacy Policy are posted, will be taken as acceptance of those changes.

▪ Contact Information

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Neil Quisumbing

Chief Executive Officer & Chief Technical Officer