

## PRIVACY POLICY

*Effective date: 1<sup>st</sup> July 2021*

We understand 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 otherwise collected by us when providing our website and team insights and management software as a service “TeamForm” and related services to you (together, our **Services**). In this Privacy Policy we, us or our means TeamForm Pty Ltd ABN 98 650 292 943.

This Privacy Policy is based on the requirements under the Australian *Privacy Act 1988* (Cth). If we enter into a Data Processing Addendum with a client and the Data Processing Addendum conflicts with or is inconsistent with this Privacy Policy, we will act in accordance with the requirements in the Data Processing Addendum. Note that in such circumstances, we may not be able to assist you in exercising a privacy rights request (such as an access or correction request) until we have instructions from our client.

### Types of information

**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.

**Sensitive information:** is a sub-set of personal information that is given a higher level of protection. Sensitive information means information relating to your racial or ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation or practices, criminal records, health information or biometric information.

### The information we collect

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

If you are a business contact for a client or potential client of ours:

- your name;
- your business contact details, including email address, mailing address, street address and/or telephone number;
- the business you work for and your role;
- your preferences and/or opinions;
- any information you provide to us, including as feedback or through customer surveys; and/or
- details of products and services we have provided to you and/or that you have enquired about, and our response to you.

If you are a user of our website or software as a service (also known as SaaS) (i.e. where you are an authorised users of our client’s SaaS account):

- your name;
- your email address;
- your employer’s internal ID assigned to you;
- the business you work for and your role;
- the password you choose;
- your preferences and/or opinions;
- any information you provide to us, including as feedback or through customer surveys;
- details of your use of our website and/or software as a service, which may include:
  - your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour;

- information about your access and use of our Services, including through the use of Internet cookies, your communications with our online Services, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider;
- additional personal information that you provide to us, directly or indirectly, through your use of our Services, associated applications, associated social media platforms and/or accounts from which you permit us to collect information; and/or
- any other personal information requested by us and/or provided by you or a third party.

If information is input into our Services about you (i.e. where you are an employee, contractor or supplier of a client of ours):

- your name and any unique ID you are assigned within our software as a service;
- the business you work for and your role;
- your employer's internal ID assigned to you;
- the teams within the business you are part of;
- information about the functions and activities you perform within the business;
- information about your contact details;
- information about your salary or salary band;
- information about your skills and capabilities; and/or
- any other personal information provided about you by our business client or a third party.

**Sensitive information:** We do not actively request sensitive information about you unless our client directs us to do so. If at any time we need to collect sensitive information about you, unless otherwise permitted by law, we will collect sensitive information as permitted by law and we will only use sensitive information as required or authorised by law.

### How we collect personal information

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

- **Directly:** We collect personal information which you directly provide to us, including if you contact us via the contact details on our website, when you request software support assistance from us or when you actively sign up for our marketing list.
- **Indirectly:** We may collect personal information which you indirectly provide to us while interacting with us, such as when you use our website and/or software as a service, in emails, over the telephone and in your online enquiries.
- **From third parties:** We collect personal information from third parties, such as our client who maybe be your employer or may engage you as a contractor or supplier, if our client uses our SaaS to input and analyse information about their workforce. We may also collect details of your use of our website and software from our analytics and cookie providers and marketing providers. See the "Cookies" section below for more detail on the use of cookies.

### Purposes of collection, use and disclosure of personal information

**Personal information:** We may collect, hold, use and disclose personal information for the following purposes:

If you are a business contact for a client or potential client of ours:

- to contact and communicate with you about our Services;
- for internal record keeping, administrative, invoicing and billing purposes;
- to offer additional benefits to you;
- for analytics, market research and business development, including to operate and improve our Services and associated applications;
- for advertising and marketing, including to send you promotional information about our products and services and information that we consider may be of interest to you;
- to comply with our legal obligations and resolve any disputes that we may have; and/or

- if otherwise required or authorised by law.

If you are a user of our website or software as a service:

- to enable you to access and use our Services, including to provide you with a login or offer a single sign on solution, such as via your employer's chosen authentication service or an open service like Google, LinkedIn, Microsoft or Facebook;
- to enable you to access and use our associated applications;
- to contact and communicate with you about our Services;
- for internal record keeping, administrative, invoicing and billing purposes;
- for analytics, market research and business development, including to operate and improve our Services and associated applications;
- to comply with our legal obligations and resolve any disputes that we may have; and/or
- if otherwise required or authorised by law.

If information is input into our Services about you:

- to provide our Services to our client, including to process and create results using the information provided by our client or a third party;
- for internal record keeping, administrative, invoicing and billing purposes;
- for analytics, market research and business development, including to operate and improve our Services and associated applications;
- to comply with our legal obligations and resolve any disputes that we may have; and/or
- if otherwise required or authorised by law.

If you apply to work with us: We will also collect and handle your personal information if you have applied for employment or a contractor role with us, to consider your employment application or contractor application and to manage your work with us as an employee or contractor, if you are selected for the role.

**Sensitive information:** We may collect, hold, use and disclose sensitive information for:

- the primary purpose, which is typically to provide our Services to our clients;
- any other purpose you consent to; and
- any reasonably expected secondary purpose which is directly related to the primary purpose.

### Disclosure of personal information to third parties

We may disclose personal information to:

- provide our Services to our clients;
- our client, if you work for a client of ours;
- third party service providers for the purpose of enabling them to provide their services, to us, including (without limitation) marketing or advertising software or service providers, our CRM provider, IT service providers, data storage, web-hosting and server providers, debt collectors, maintenance or problem-solving providers and professional advisors;
- our employees, contractors and/or related entities;
- our existing or potential agents or business partners;
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, 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 to improve our Services, such as Google Analytics (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), Hotjar, Segment, Sentry and/or other relevant analytics businesses; and/or

- any other third parties as required or permitted by law, such as where we receive a subpoena.

**Overseas disclosure:** We host all the personal information collect via our software in Australia. However, we may contractually agree with you to host the information elsewhere. While we host our data in Australia, where we disclose your personal information to third parties listed above, these third parties may store, transfer or access personal information outside of Australia, including but not limited to, the United States of America.

We will only disclose your personal information to countries with laws which protect your personal information in a way which is substantially similar to the Australian Privacy Principles or we will take such steps as are reasonable in the circumstances to have the overseas recipient protect your personal information in accordance with the Australian Privacy Principles.

### 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 provide our Services to you and your use of our Services.

**Information from third parties:** If we receive personal information about you from a third party, such as your employer who you work for, which will be the primary source, 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.

**Anonymity:** Where practicable we will give you the option of not identifying yourself or using a pseudonym in your dealings with 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.

**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.

**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. You also have the right to contact the relevant privacy authority.

### 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. Please see the details of the types of security controls we have in place [here](#).

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.

### Cookies

We may use cookies on our online Services 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 Services and allow third parties, such as Google and Facebook, may cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. If and when you or a third party, such as your employer, choose to provide our online Services 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), our online Services may not perform as designed, or you may not be able to access all or parts of our online Services.

### Links to other websites

Our Services may contain links to other 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.

### 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 our Privacy Officer [here](#):**

TeamForm Pty Ltd ABN 98 650 292 943