



Blakthumb Privacy Policy

Last updated: 16 September 2021

In the course of carrying out our activities, Blakthumb Pty Limited (ACN 636 256 785) (**we, us or our**), and our subsidiaries and related bodies corporate, will collect, store, use and disclose personal information. We are committed to the protection of your personal information and to compliance with applicable privacy laws.

Personal information

Personal information and/or personal data (the terms commonly used in applicable privacy laws), is information or an opinion about an identified or reasonably identifiable individual, whether or not the information or opinion is true and whether or not the information is recorded in a material form.

Types of personal information we collect and hold

We may collect and hold personal information about individuals for the provision of our products and services (including our website, mobile applications and other online platforms and services) and purposes connected to those products and services.

Consistent with the provision of our products and services, the types of personal information we may collect, and hold includes:

- (a) *Identity and contact details* – including individuals' name, address (including business address), telephone number and email address;
- (b) *Profile data* – profile information, usernames, passwords and preference data, and related information;
- (c) *Payment details* – information associated with the purchase of any goods and/or services from us, including payment and card details (please note payment transactions are processed by an authorised third party and are encrypted by the acquiring bank so we will not retain any payment card details); and
- (d) *Other information* – text of communications gathered in the course of our interaction with you, including where you comment within our platforms and/or otherwise interact on live-chat, social media and emails, and other information from your interactions with us online, including cookie information, security tokens, IP address, URL's, search histories and other associated information.

Relevant to each of the European Union and United Kingdom's General Data Protection Regulation (together, the **GDPR**), the basis for our processing of your personal information under the GDPR is with your consent and to enable us to perform the contract with you related to the services you have asked us to provide. If you don't provide us with personal information, we are unlikely to be able to provide you with our products and services.



How we collect and hold personal information

We may collect personal information directly from you in the course of providing our products and services, from our website, mobile applications and other online platforms, and/or directly from you, including using cookies (data files placed on your device or computer), log files and security tokens.

In some cases, we may collect information about you indirectly, such as from third party providers of our products and services, providers of data analytics services and providers of third party websites, apps and social media platforms.

Personal information is held securely, is subject to various security protections and is held only for as long as the information remains relevant to the purpose for which it was collected.

Purposes for which we hold, use and disclose personal information

We will not use or disclose personal information for any secondary purpose, unless that secondary purpose is related to the primary purpose for which we have collected that information, and you would reasonably expect the disclosure in the circumstances, or unless you consent to that use or disclosure.

The purposes for which we collect, hold, use and disclose information may include:

- (a) conducting our business, which includes providing our products and services to you;
- (b) to communicate information about our products and services or third party products or services that may be of interest to you;
- (c) (where you have consented, if such consent is required by law) to provide you with information or advertising relating to our products or services (including targeted advertisements) or marketing communications we believe may be of interest to you;
- (d) to improve and optimise our platforms (including our website and mobile applications) and services;
- (e) for our internal administrative, research, planning, marketing and product development purposes; and
- (f) to comply with legal obligations.

We may also disclose personal information to third party technology and marketing partners, including but not limited to Amazon Web Services and Google (including Google Analytics) and other technology and marketing service providers.

Use of cookies

Like most services, we use cookies and similar technologies, including as follows.

- (a) Cookies: being data files that are placed on your device or computer and often include an anonymous unique identifier.



- (b) Log files: these track actions occurring on our website and platform.
- (c) Web beacons, tags, and pixels: these are electronic files used to record information about how you browse our website and platform.

As we and our third party partners adopt additional technologies, we may also gather additional information through other methods.

We will use the term “cookies” throughout this Privacy Policy to cover all these technologies.

Types of cookies and how we use them

Necessary Cookies: These cookies allow us to operate our website and platform. They enable you to move around the website and platform and use their respective features.

Functional Cookies: These cookies let us operate the website and platform according to your preferences. They enable the website and platform to remember choices you make (such as language, or the region you are in). Without these cookies, certain features of our website and platform won't work, and you may find that our website and platform are less convenient and reliable.

Analytics Cookies: We use these cookies to analyse how our website and platform are accessed, used or performing. These cookies collect information about how visitors use our services, for instance which pages visitors go to most often, and if they get error messages from webpages. We use this information to maintain, operate, and continually improve the website.

Targeted Advertising Cookies: We use these cookies to serve you with advertisements that may be relevant to you and your interests. They are usually placed by advertising networks, such as Facebook, LinkedIn and Twitter, with our permission.

Your Choices

You have the options to control or limit how we and our partners use cookies and similar technologies for advertising and analytics purposes.

Although most browsers and devices accept cookies by default, their settings usually allow you to clear or decline cookies. If you disable cookies, however, some of the features of our Services may not function properly.

You can change your settings through your web browser to:

- (a) notify you when a cookie is being set or updated; and
- (b) to block or disallow cookies.

Please refer to the 'help' or 'settings' sections on your applicable web browser for more information.

Use your mobile device settings to control how data about your use of mobile applications is used for purposes of showing ads that are targeted to your interests on your mobile device.



Blocking cookies on one device (e.g. your computer) will not affect your consent choices different devices (e.g. your mobile device).

In addition to managing your cookie settings for your browser or mobile, you can opt-out of tracking directly with the businesses that operate the tracking technologies. For example, to opt-out of analytic tracking by Google Analytics, you may visit <https://tools.google.com/dlpage/gaoptout>. This paragraph is not an exhaustive list of our partners that operate tracking technologies, please contact us below if you have any questions about other partners.

For individuals located in the European Economic Area (EEA) and in the UK, you can change your cookie consent choices within our consent management functionality available [here](#).

Access and correction

We will take all reasonable steps to ensure any personal data we collect, use or disclose is up to date and accurate. If you believe personal information that we hold about you is not up to date or accurate, you may ask us to correct it.

You may ask us to provide you with details of the personal information we hold about you, and copies of that information. We will respond to your request and attempt to provide you with the data within 30 days of receipt of your request.

If we provide you with copies of the information you have requested, to the extent permitted by law, we may charge you a reasonable fee to cover the administrative costs of providing you with that information.

Please direct all request for access and correction to privacy@blakthumb.com.

Some other rights in relation to your privacy

Relevant to the GDPR, some individuals also have a right, in certain circumstances, to have the information held about them erased. You can talk to us further about this at privacy@blakthumb.com. Such individuals can also request that we restrict or suspend the processing of your personal information. If you do so, note that we will then be most likely unable to provide the services to you.

The GDPR also provides that in some circumstances, individuals have a right to data portability, to withdraw their consent at any time, to object to data processing and to object to processing of data for marketing purposes.

Overseas disclosure

Relevant to the GDPR, in order to provide our services to you, we may disclose the information which we process to countries outside the EEA and the UK. Regardless of the location of our processing, we will impose adequate data protection safeguards and implement appropriate measures to ensure that your personal data is protected in accordance with applicable data protection laws.

In relation to our Australian operations, we may, in the course of providing products and services, disclose personal information to overseas entities including by utilising overseas data servers to process information. Those overseas entities and their servers may be located in the United States, the UK and/or the EEA.

Changes to this Privacy Policy



We will review and may update this Privacy Policy from time to time as needed without notice. Therefore, you should review the terms of this Privacy Policy periodically to make sure that you are aware of how we collect, hold, store and use personal information. The date this policy was last updated will be set out at the start of the Privacy Policy.

Complaints

If you consider a breach of the *Privacy Act 1988* (Cth) or GDPR has occurred, you may direct your query to our Privacy Officer using the details set out below and we will attempt to resolve your complaint.

If you do not consider our response satisfactory, you may contact the Australian Privacy Commissioner at its website www.oaic.gov.au or by telephone on 1300 363 992. For EU individuals, you can contact your relevant local data protection authority, which can be located at via the European Data Protection Supervisor and/or this [link](#). UK individuals may contact their local supervisory authority, the Information Commissioner's Office (see [here](#)).

Contacting us

If you have any questions about this Privacy Policy and would like further information, please contact us at privacy@blakthumb.com.