

Tambla Limited Privacy Policy

18 December 2020

Tambla Limited (ACN 000 648 082) and its subsidiaries (referred to as “**we**” or “**us**”) provide workforce management software and services in Australia, New Zealand and the United Kingdom. We recognise the importance of protecting our customer’s (referred to as “**you**” below) personal information and our Privacy Policy is designed to assist you in understanding how we collect, use and safeguard the personal information you provide to us and to assist you in making informed decisions when using our site. This Privacy Policy will be continuously assessed against new technologies, business practices, and our customers' needs.

Our commitment in respect of protecting your privacy is to abide by the Australian Privacy Principles and the Notifiable Data Breach Scheme for the protection of personal information, as set out in the *Privacy Act 1988 (Cth)* and any other relevant law. In addition to the Privacy Act, individuals who are located in the European Union may have certain rights under the General Data Protection Regulation (**GDPR**). The GDPR provides for the harmonisation of data privacy laws in each EU State and gives more rights to individuals who are located within an EU State. We have set out the details of how we will protect the additional rights of individuals located in the EU in Schedule.

What is personal information?

Personal information includes any information or opinion, about an identified individual, or an individual who can be reasonably identified from their information.

What information do we collect?

When you visit this website, use our products or services, register for any of our products, services or newsletters or use our mobile apps or are dealing with us in some other way, we may collect identification information. If you do not allow us to collect all the information that we request, we may not be able to deliver all of our products and services effectively.

The information we collect may include:

- information about your identity – including your name, address, telephone or mobile number, email address, date of birth;
- details of the products you have purchased;
- financial and transaction information;
- information relating to your use of our website including your location information, IP address and any third party sites you access (please refer to “How do we use the information we collect electronically” below);
- additional personal information about you such as records of complaints or queries and our responses; and
- any other information we think is necessary.

Sensitive Information

The Privacy Act restricts the collection of sensitive information. This includes information about your religion, racial or ethnic origin, political opinions, criminal record and sexual orientation. It also includes health information and biometric information.

Generally we would not collect this type of information unless it is necessary to provide you with a specific product or service and you have consented to that collection.

Agents and Authorised representatives

You may need to provide personal information about other individuals to us (for example, about your agents or authorised representatives). If so, we rely on you to inform those individuals that you are providing their personal information to us and to advise them that we can be contacted for further information (see "How to contact us" at the end of this policy).

Unsolicited Information

Sometimes people share information (including sensitive information) with us that we would not have sought out. If we receive unsolicited personal information (including sensitive information) about you, we will determine whether we would have been permitted to collect that information. If yes, then we will handle this information the same way we do with other information that we seek from you or in the manner described in this policy. If no and the information is not contained in a Commonwealth record, then we will destroy or de-identify it as soon as practicable, but only if it is lawful and reasonable to do so. Often, it is not possible for us to neatly unbundle this information then destroy or de-identify only certain sections or parts of it, and we may need to store this information for future use. We have many security safeguards in place to protect the information from interference, misuse, loss, unauthorised access, modification or disclosure.

Website use information

Similar to other commercial websites, we use a standard technology called "cookies" (see explanation below, "What are Cookies?") and web server log files to collect information about how our website is used. Information gathered through cookies and web server logs may include the date and time of visits, the pages viewed, time spent on our website, and the websites visited just before and just after our website.

What are cookies?

A cookie is a very small text document, which often includes an anonymous unique identifier. When you visit a website, that site's computer asks your computer for permission to store this file in a part of your hard drive specifically designated for cookies. Each website can send its own cookie to your browser if your browser's preferences allow it, but (to protect your privacy) your browser only permits a website to access the cookies it has already sent to you, not the cookies sent to you by other sites. Browsers are usually set to accept cookies. However, if you would prefer not to receive cookies, you may alter the configuration of your browser to refuse cookies. If you choose to have your browser refuse cookies, it is possible that some areas of our site will not function as effectively when viewed. A cookie cannot retrieve any other data from your hard drive or pass on computer viruses.

How we use your personal information?

Broadly speaking, we use personal information for the purposes of administering our business activities; providing the products and services you requested; monitoring the use of your service: marketing and promotional efforts; improving our content and service offerings, customising our site's content, layout, services; and for other lawful purposes. These uses improve our site and enable us to better tailor it to meet your needs.

Occasionally, we may also use the information we collect to notify you about important changes to our website, new services, special offers and products from us and our agents, business partners and affiliates that might serve your needs (such as by way of updates or newsletters), to run promotions and to communicate other offers or opportunities in which think you will find valuable. We may offer you these products and services by mail, telephone, email, SMS or other electronic means and third party channels such as through social media or targeted advertising through Tambla Group and non-Tambla Group websites. Please notify us at any time if you do not wish to receive these offers by emailing us at the link provided in the relevant communication.

How do we collect information electronically and use it?

Cookies

As you visit and browse our website, the site uses cookies to differentiate you from other users. In some cases, we also use cookies to prevent you from having to log in more than is necessary for security. Cookies, in conjunction with our Web server's log files, allow us to calculate the aggregate number of people visiting our website and which parts of the site are most popular allowing us to better understand our users' behaviours and habits. We may use cookie information to display targeted advertisements or content on this website and also on third party networks and websites such as Google and Facebook (**Third Party Websites**). We may use re-marketing tools such as Google and Adwords to tailor our marketing to (for example) better suit your needs and only display advertisements that are relevant to you. This helps us gather feedback to constantly improve our website and better serve our clients.

Cookies do not allow us to gather any personal information about you and we do not intentionally store any personal information that your browser provided to us in your cookies. The cookies cannot read your hard drive or obtain any information from your browser or have your computer perform any action and cannot be sent to another site.

IP addresses

IP addresses are used by your computer every time you are connected to the Internet. Your IP address is a number that is used by computers on the network to identify your computer. IP addresses are automatically collected by our web server as part of demographic and profile data known as traffic data so that data (such as the Web pages you request) can be sent to you.

When you visit our website or related landing pages to read, browse, submit or download information, our system will record/log information such as your IP address, date and time of your visit to our site, the pages viewed and any information downloaded. We may automatically collect non-personal information about you such as the site from which you linked to our website.

Web Beacons

A web beacon is typically a transparent graphic image invisible to the user that is placed on a website. The use of a web beacon allows the website to record the simple actions of the user (such as opening the page that contains the beacon) through a tracking pixel. We may use web beacons (and cookies) for purposes such as site usage analytics, advertising auditing and reporting, as well as content and "advertising/ marketing personalisation". We may share any data collected from web beacon (and cookies) with third parties to provide you with relevant advertising when browsing Third Party websites.

Information from Third parties

Our website may contain links to Third Party Websites (for example, third party providers of goods and services). If you accessed Third Party Websites through our website and if those third parties collect information about you, we may also collect or have access to that information as part of our arrangements with those third parties. Where you access a Third Party Website from our website, cookie and web beacon information, information about your preferences or other information you have provided about yourself may be shared between us and the third party.

We are not responsible for the practices employed by websites linked to or from our website or the information or content contained therein. Often links to other websites are provided solely as pointers to information on topics that may be useful to the users of our website.

Please remember that when you use a link to go from our website to another website, our Privacy Policy is no longer in effect. Your browsing and interaction on any other website, including websites, which have a link on our website, is subject to that website's own rules and policies. Please read over those rules and policies before proceeding.

Online Applications for information

When you send a completed online application to us, we retain the information contained in that application. We are able to then use that information to provide any products and services that you require.

Sharing and selling information

We do not sell, lend or lease any of the information that uniquely identifies a subscriber (such as email addresses or personal details) with anyone outside the Tambla Group.

How do we hold personal information?

The majority of information that we hold about you will be stored in secure data centres located in Australia and owned by us or trusted external service providers. Some information about you will be stored in paper files. We use secure buildings and systems to protect the security of the personal information we hold and we aim to only retain the personal information we hold for as long as we need it (such as for business or legal reasons). Some of the measures we have in place to protect the security of your personal information include:

- ensuring that our staff are trained to keep information secure;
- controlling access to information systems by passwords;
- ensuring our systems are secure by the use of firewalls, virus scanning tools and by using secure encryption of data sent from your computer or device to our systems;
- reviewing compliance with internal policies and industry best practice; and
- taking reasonable steps to destroy or permanently de-identify any personal information after it is no longer required.

How do we disclose your personal information?

We may share your personal information with other companies within the Tambla Group.

We may provide personal information about you to organisations outside the Tambla Group. Where this happens, we take reasonable steps to ensure that these organisations are bound by confidentiality and privacy obligations in relation to the protection of your personal information. They also enter into obligations under these contracts to only use the personal information for the specific role that they have been engaged to perform. We may share information with these third parties for the reasons set out in "How do we use your personal information". These third parties may include:

- businesses who are doing work for us such as IT support, debt recovery, direct marketing, statement production, printing, customer enquiries, market research, website analysis and performing other business needs;
- agents and advisors who act on your behalf;
- current or previous employers;
- regulators, government or law enforcement agencies;
- associated businesses that may want to market products and services to you; and
- anyone, where you have provided us with consent.

Some of the above external organisations and entities may be located outside of Australia.

Transfer of Information overseas

We may disclose your information to a recipient overseas. This includes:

- companies within the Tambla Group;
- where we deal with customers in countries other than Australia, service providers or third parties who store data or operate within the European Union where this is deemed necessary to standard operations; and
- where we must comply with laws and assist law enforcement and government agencies.

You should note that while these overseas recipients will often be subject to confidentiality or privacy obligations, they may not always follow the particular requirements of Australian privacy laws. In the event that a disclosure is made in an overseas country, the information will not be protected by the Australian Privacy Principles. In any event, by providing your details, you consent to your information being disclosed in this manner. Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we are not responsible for that disclosure.

We may store your information in the cloud or other types of networked or electronic storage. You should note that, as electronic or networked storage can be accessed from various countries via an internet connection, it is not always practicable to know in which country your information may be held or accessed.

In addition, the Internet is made up of a large number of international connections. If you are visiting this Web Site from a country other than the country in which our server is located (currently Australia), the various communications will necessarily result in the transfer of information across international boundaries. By visiting this website and communicating electronically with us, you consent to these transfers.

How can you access and correct your information?

You may request access to all your personally identifiable information that we collect online and maintain in our database by contacting us (Refer to “How to Contact Us” below). You can also ask for corrections to be made. We will respond to these requests within a reasonable time from them being made. Please note that there are some circumstances in which we are not required to give you access to this information. If we decline to give you access to or to correct your personal information, we will explain our reasons unless it would be unreasonable or unlawful to do so. There is no fee for requesting access to your information but we may charge a reasonable cost in to cover locating and supplying the information to you.

In some circumstances, we are not required to give you access to your personal information. If we refuse to give you access to your personal information or to correct your personal information, we will provide with an explanation of our refusal setting out our reasons within five business days of making the decision.

If you think that the personal information does not need to be corrected further to your request, you may ask us to include a statement with the information that states that you believe its inaccurate, incomplete, misleading or out of date. We will respond within a reasonable time of your request being made.

What about legally compelled disclosure of information?

We may disclose information when legally compelled to do so, in other words, when we, in good faith, believe that the law requires it or for the protection of our legal rights. We may also disclose account information when we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be violating our Terms and Conditions or to protect the safety of our users and the public.

Your consent

By submitting your data to us and/or by using our website, you consent to our collection and use of your personal information as described in this Privacy Policy. We reserve the right to amend this Privacy Policy at any time with or without notice.

Our commitment to data security

Please note that your information will be stored and processed on our computers and those belonging to the Tambla Group in Australia and the UK (in addition to any information held by overseas recipients as set out in the section on Transfer of Information Overseas). The laws on holding personal data in Australia or other countries may be less stringent than the laws of your country of residence or citizenship. To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect online.

We take protecting the security of your personal information seriously. We have a response plan that is designed to enable us to contain, assess and respond to suspected data breaches in a timely fashion, and to help mitigate potential harm to affected individuals.

Business without identifying you

In most circumstances, it will be necessary for us to identify you in order to successfully do business with you. However, where it is lawful and practicable to do so, we will provide you with the option to remain anonymous or to use a pseudonym, for example, when you make general inquiries about our business or current promotional offers.

Choice/opt-in/opt-out

All marketing correspondence allows recipients to unsubscribe so that they will not receive future messages. After unsubscribing, we will discontinue sending the particular messages as soon as technically feasible.

Acquisition or changes in ownership

In the event that the website (or a substantial portion of its assets) is acquired, your information would be considered part of those assets and may be part of those assets that are transferred.

Policy modifications

We may change this Privacy Policy from time to time. An up-to-date version of this policy is available at any time at www.tambla.com.au, so be sure to check back periodically. However, please be assured that if the Privacy Policy changes in the future, we will not use the personal information you have submitted to us under this Privacy Policy in a manner that is materially inconsistent with this Privacy Policy, without your prior consent.

Resolving your privacy concerns

Please contact us if you are concerned about how your personal information is being handled. We will acknowledge your complaint as soon as we can once we have received it and let you know if we require any further information to resolve it. We will try to resolve your complaint as soon as possible. To make a complaint, please refer to "How to Contact Us" below. We endeavour to resolve complaints within 30 days. If we cannot resolve it within this time, we will contact you to discuss a new timeframe. If you are unhappy with how we manage your complaint, under the Privacy Act, you may complain to the Office of the Australian Information Commissioner about the way we handle your personal information. The contact details are:

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Fax: +61 2 9284 9666

Post: GPO Box 5218, Sydney NSW 2001

How to Contact Us

You may contact us during AEST business hours by:

Calling: +61 (0) 2 9122 6200

Write to Us at: Level 1, 100 Arthur Street, North Sydney NSW 2060

Email us at: info@tambla.com.au