

SALYENT PTY LTD
ABN: 62 108 280 897

Privacy Policy

LAST UPDATED ON 16 APRIL 2020

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Introduction

Your privacy is important to us, and Salyent Pty Ltd is committed to providing quality services to you.

The following sets out our policy in respect of how we manage your Personal Information. We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act), and EU General Data Protection Regulation (EU GDPR), which govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at www.aoic.gov.au. Further detail on EU GDPR may be obtained from European Commission at ec.europa.eu/commission/priorities/justice-and-fundamental-rights/data-protection.

Collection of Personal Information.

We collect and hold personal information from clients, customers, subscribers, employees, contractors and other individuals. We collect and hold this information when it is necessary for business purposes.

Examples of Personal Information we collect include:

- Full names
- Home addresses
- Email address
- Passwords
- Job title
- Profile data including photo
- Phone and facsimile numbers.
- Financial information such as credit card information.
- Courses and subscription data e.g. Purchase behavior.

This Personal Information is obtained in many ways including but not limited to the following methods:

- when you are contacting us (Including unsolicited information)
- Visit website www.salyent.com, Apps and social media
- Create a user account on our website www.salyent.com
- face to face meetings
- correspondence by phone and email.
- Surveys and Poll
- Webinar and Event Registration such as Global Forum, Conference and Training
- from media and publications
- from other publicly available sources and from third party provider.

Privacy on our website and applications

This policy also applies to any personal information we collect via our websites, and applications including mobile applications, in addition to personal information you provide to us directly - such as where you make a request, complete a registration form and/or create a user account in our website.

We also collect information automatically, including technical information related to your mobile device, your device's unique identifier, your mobile network information, the type of mobile browser you use and information about the way you use our products, services or apps.

We or our service providers use web analytics to collect a range of information about your interactions with our websites. Web analytic software collects the information using several techniques including cookies (both first and third party) and Java Script. We also use web analytics to collect information from the browsers of those who use our websites or participate in our LinkedIn group.

The information we collect includes IP address, domain name, date and time of visit, the pages visited, and time spent on each page, whether you have visited the site before and what site referred the visitor to the web page. We use this information to evaluate the effectiveness of our websites and the level of interest pages.

Third party websites

Please note that our websites contain links to other sites. We use third-party advertising services like LinkedIn and Google's ad services, and other ad networks and ad servers to deliver advertising about our Services on other websites and applications you use. The ads may be based on things we know about you, and things that these ad service providers know about you based on their tracking data. The ads can be based on your recent activity or activity over time and across other sites and services and may be tailored to your interests.

Depending on the types of advertising services we use, they may place cookies or other tracking technologies on your computer, phone, or other device to collect data about your use of our Services, and may access those tracking technologies in order to serve these tailored advertisements to you. We are not responsible for the privacy practices or policies of those sites and we suggest that you review the privacy policies of those other sites.

Cookies

Our server automatically recognizes and stores the domain name of visitors to our websites. In addition, our websites use cookies (both first and third party) which automatically collect information from you such as pages viewed.

A cookie is a packet of information stored on your computer that allows our server to identify and interact more effectively with your computer. We also use cookies for tracking the statistics of our websites which means that we can better understand your needs and interests as well as improve the layout and functionality of our websites.

If you are uncomfortable with the use of cookies, you can manage and control them by deleting them from your 'browser history' (cache) when you leave the site. In most cases, you can refuse a cookie and still fully navigate our websites.

The Use of Personal Information

We collect your Personal Information for the primary purpose of providing our services to you, We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. For example, we might collect personal information as part of undertaking surveys, research on current issues or as part of projects or initiatives we are conducting with other organisations.

We use the data we collect through your use of the Services to:

- Provide and administer the Services, including to display customized content
- Process your requests and orders on our products and services.

- Communicate with you about your account by: Responding to your questions and concerns; sending you administrative messages and information, including messages from instructors and notifications about changes to our Service, and updates to our agreements.
- Sending you information and in-app messages about rewards programs, new services, new features, promotions, newsletters, and other available services (which you can opt out of at any time)
- Sending push notifications to your wireless device to provide updates and other relevant messages (which you can manage from the “options” or “settings” page of the mobile app)
- Manage your account preferences
- Facilitate the Services’ technical functioning, including troubleshooting and resolving issues, securing the Services, and preventing fraud and abuse
- Solicit feedback from users
- Market and administer surveys and promotions (which you can opt out of at any time)
- Learn more about you by linking your data with additional data through third-party data providers or analysing the data with the help of analytics service providers
- Tailor advertisements across devices
- Improve our Services and develop new products, services, and features
- Analyse trends and traffic, track purchases, and track usage data;
- Advertise the Services on third-party websites and applications
- As required or permitted by law; or
- As we, in our sole discretion, otherwise determine to be necessary to ensure the safety or integrity of our users, employees, third parties, the public, or our Services.

If we collect, hold or use personal information in ways other than as stated in this policy, we will ensure we do so pursuant to the requirements of the Australia Privacy Act and EU GDPR.

Disclosure of Personal Information

We may only disclose your personal information:

- Where the disclosure is necessary to fulfill your request and involves a third-party organization with which we have a relationship (see “Contractors and Partners” below);
- As required by a court order or any other legal or regulatory requirement.
- Where the disclosure is reasonably related to the sale or other disposition of all or part of our business.
- you give your consent.
- to protect the rights, property or personal safety of any member of the public and interest of Salyent Pty Ltd.

Sensitive Information

We only disclose sensitive information such as health information, criminal history, racial or ethnic origin, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, and sexual preferences or practices for the purposes for which you gave it to us or for directly related purposes you would reasonably expect.

Contractors and Partners

We disclose personal information to contracted service providers who assist us with a number of our functions and services including service providers of technology, data processing, contact center, legal, accounting, business consulting, auditing, archival, delivery, banking, payments,

market research, content production and mailing but only for the purpose of fulfilling those services.

Events

We disclose the name, title and post nominal of event participants to speakers, organisers, hosts or facilitators under strict conditions to enable them to carry out their role in relation to an event, for example, to organise table lists, or facilitate introductions. We also disclose this information to sponsors and potential sponsors to enable them to assess whether to sponsor an event and disclose this to providers of special participant offers from time to time under strict conditions

Overseas disclosure

From time to time, we may send your personal information overseas to some of our service providers that are located in other countries. We will take reasonable steps to ensure that the host does not breach and violate the data. The steps we take include:

- Adding provisions in our contract with the service provider that require them to protect the personal information they hold; and
- When choosing a service provider, including in our considerations the privacy law or scheme (if any) that applies in the country in which the service provider operates.
- The service provider cannot engage another provider in performing their duties and responsibilities without our authorisation.
- Ensure the service provider satisfy its security obligations, data protection impact assessment and data breach notifications.

In each case, we comply with the Australian Privacy Principles and EU General Data Protection Regulation (EU GDPR) as well as with any legal requirements applicable in the relevant jurisdiction when disclosing your personal information to that overseas recipient.

Security and Retention of Personal Information

We regularly assess the risks of misuse, interference, loss, unauthorised access, modification or disclosure of personal information and ensure that we have adequate measures, including policies, procedures and technology to address those risks. As with any internet-enabled system, there is always a risk of unauthorised access, so it's important to protect your password and to contact us if you suspect any unauthorised access to your account.

We limit staff access to personal information to that which they need to carry out their role. We conduct regular internal and external audits to assess whether we have adequately complied with or implemented these measures.

The steps we take to secure the personal information we hold include ICT security (such as encryption, firewalls, anti-virus software and login and password protection), secure office access, personnel security and training and workplace policies.

Payment security

We process purchases, subscriptions and other payments using online technologies such as a *secured online banking merchant facility and PayPal*. We ensure that all transactions processed meet industry security standards to ensure payment details are protected.

Website security

While we strive to protect the personal information and privacy of website users, we cannot guarantee the security of any information that you disclose online: you disclose that information

at your own risk. If you are concerned about sending your information over the internet, you can contact us by phone, email or post.

You can also help to protect the privacy of your personal information by keeping passwords secret and by ensuring that you log out of the website when you have finished using it. In addition, if you become aware of any security breach, please let us know as soon as possible.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. Unless one of the below user rights complied to EU GDPR is exercised by the user, the information will be stored in our files for **a minimum of 5 (Five) years**.

Additional Personal Information Rights

With additional compliance to EU GDPR, we give you a number of rights with respect to how we process your personal data. These rights may be exercised by emailing us at info@salyent.com. We will endeavor to respond the requests within 30 days.

Right to be Informed

You have the right to be informed of the use that your personal data will be put to, along with details of the Data Controller and your rights. Where you provide your personal data directly to us, these details will be made available at the time your data is obtained.

Where we obtain your personal data from a third party, these details will be made available within a reasonable period of having obtained the data. If your personal data is to be used to communicate with you, these details will be provided at the latest, when the first communication takes place.

Right to Access

You have the right to access and obtain a copy of your personal data held and processed by us on request. Unless there is a lawful reason not to, we will give you access to it and allow you to correct any incorrect information.

In order to protect your Personal Information, we may require identification from you before releasing the requested information.

Should you wish to exercise your right please email us at info@salyent.com in writing to provide a clear trail of correspondence and evidence of your actions.

Right to Rectification

You have the right to request us to correct inaccurate or incomplete personal data. Our policy is to take reasonable steps to correct that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up-to-date, complete, relevant and not misleading.

If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

Right to Erasure (to be Forgotten)

You have the right to request us to erase your personal data from its systems and records. This is not an absolute right and does not normally apply for compliance with legal obligation.

Below is the example of circumstances where you have the right to require us to securely delete or destroys your personal information:

- If the personal information we hold about you is no longer necessary for the purposes for which we originally collected it.
- The processing is based on consent - if you have previously given your consent to collecting and processing your personal information, and you notify us that you withdraw your consent. Please note that withdrawing your consent does not mean the processing of your personal data which occurred before the withdrawal was unlawful.
- We are processing your personal information for direct marketing purposes, and you want us to stop.
- If you think we have processed your personal information unlawfully.

If you think any of the above situations apply, we may ask you for an explanation and further information to verify this.

Right to Restrict Processing

You have the right to request us to stop or restrict the processing of your personal data. This could be for example, if your personal data is no longer necessary for purpose of processing.

We may restrict your personal information by temporarily moving the information to another processing system, making the information unavailable to users, or temporarily removing published information from a website. We may also use technical methods to ensure the personal information is not subject to further processing and cannot be changed. When we have restricted processing of personal information, this will be clearly indicated on our systems.

Right to data portability

You have the right to request a copy, in a portable format, of the personal data which you have provided directly to us and which is automatically processed. This right shall not apply to processing necessary for the performance of a task carried out in the public interest or in compliance to local law and regulation. Refer to Right to Access.

Right to object

You have the right to object to the processing of your personal data unless we demonstrate compelling legitimate grounds for processing for the establishment, exercise or defence of legal claims.

Rights related to automated decision-making including profiling

'Profiling' is automated use of personal data held on computer to analyse or predict things which have a legal effect, or other similarly significant effect, on the individual. Examples would include economic situation, health, personal preferences or interests and location.

We are permitted to make automated decisions with no human intervention in the following circumstances:

- The automated decision is necessary to enter into, or perform a contract, or complete a contract involving you and Salyent Pty Ltd.
- The automated decision is allowed under a law passed at European Union level, or at the level of European Union or EEA member state level (i.e., is allowed under a national law) or Australian law level. The law will provide safeguards to protect your rights and freedoms.

You have the right not to be subject to a solely automated decision (that is, a decision made electronically, with no human intervention), and this may include profiling, which may significantly affect yourself, unless you provide a consent.

Policy Updates

Salyent Pty Ltd operates in a dynamic business environment and we aim to review this policy annually to keep it current. We may update this privacy policy at any time by publishing an updated version on Salyent Pty Ltd website and email notification with a summary of the key changes as required by the applicable law.

As permitted by applicable law, if you continue to use the Services after the effective date of any change, then your access and/or use will be deemed an acceptance of (and agreement to follow and be bound by) the revised Privacy Policy. The revised Privacy Policy supersedes all previous Privacy Policies.

Privacy Policy Complaints and Enquiries

In the event that you have any question, concern or complaint regarding the way in which we handle your personal information, you should contact our Privacy Officer direct at info@salyent.com or at:

Salyent Pty Ltd

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AUSTRALIA