



Privacy Policy – Candoo Culture PTY LTD

Effective Date: 1/01/2026

1. Introduction

Candoo Culture PTY LTD (“we”, “us”, “our”) is committed to protecting personal information and handling data with transparency, accountability, and care. This Privacy Policy explains how we collect, use, store, disclose, and protect personal information in accordance with:

- The Privacy Act 1988 (Cth) and Australian Privacy Principles (APPs)
- UAE Federal Decree-Law No.45 of 2021 on the Protection of Personal Data (UAE PDPL)
- The General Data Protection Regulation (GDPR), where applicable
- Other relevant international data protection laws

Where services are provided to individuals or organisations in the United Arab Emirates, processing is conducted in accordance with UAE PDPL requirements.

Candoo Culture PTY LTD acts as the Data Controller for the personal information described in this Policy.

2. What Personal Information We Collect

We may collect personal information including:

- Name, email, phone number, job title, and company information
- Industry and business characteristics
- Responses to surveys, diagnostics, or feedback forms
- Platform usage information and interaction history
- Technical data (IP address, device type, browser version, approximate location)

In some cases, we may collect sensitive personal data, including:

- Wellbeing or mental health indicators
- Cultural background or identity information
- Views on workplace behaviour or emotional responses

Sensitive information is collected only where necessary, with explicit consent, and subject to additional safeguards, purpose limitation, and restricted access controls.

3. How We Collect Your Information

We collect personal and sensitive information through:

- Direct interactions (surveys, interviews, onboarding forms)
- Use of our website or Platform (cookies, analytics tools)
- Third-party sources such as business directories or publicly available data where permitted by law



4. Lawful Basis for Processing

Depending on the context, we process personal information based on one or more lawful grounds, including:

- Your explicit consent
- Performance of a contract or delivery of requested services
- Legitimate business interests that do not override individual rights
- Compliance with legal or regulatory obligations

You may withdraw consent at any time where processing relies on consent.

5. How We Use Personal Information

We may use personal information for the following purposes:

- Delivering consultancy services, reports, diagnostics, and cultural insights
- Producing aggregated survey analytics and organisational metrics
- Research, analytics, and internal product development
- AI and machine learning improvements using anonymised or de-identified data only
- Marketing communications (you may opt out at any time)
- Legal compliance, fraud prevention, and risk management

AI tools are used to support analysis and insight generation. Automated processing does not make independent legal, employment, or disciplinary decisions.

We will not use personal information for unrelated purposes without consent or a lawful basis.

6. Personalised Reports and Survey Insights

When you participate in surveys through our Platform, we may generate reports that:

- Include your name and role where agreed with your organisation
- Summarise response trends (e.g. positive or negative indicators)
- Present aggregated team or group-level insights

Reports do not display raw written responses to third parties.

By submitting responses, you consent to the collection, analysis, and summarisation of your data as described in this Policy.

If you do not wish to be identified in reporting, you may contact us [here](#).

7. Data Retention and Security

We implement encryption, access controls, and secure cloud-based protections to safeguard data.

- Personal information is generally retained for up to seven (7) years, or as required for legal or compliance purposes.
- After this period, data is permanently deleted or de-identified.
- You may request deletion at any time, subject to legal obligations.



8. Disclosure and Third-Party Sharing

We do not sell personal information.

We may share information with trusted third parties where necessary, including:

- Cloud service providers and secure storage platforms
- Analytics and insights tools (with anonymisation where possible)
- Research collaborators using de-identified datasets
- Legal or regulatory authorities where required by law

Where data is transferred outside Australia or the UAE, we implement appropriate safeguards, including contractual protections and internationally recognised transfer mechanisms to ensure adequate protection.

9. Cross-Border Data Transfers

Because our services operate globally, personal information may be processed in jurisdictions outside your country.

Where data is transferred internationally, we ensure transfers comply with:

- UAE PDPL cross-border transfer requirements
- Applicable Australian privacy obligations
- Appropriate contractual and security safeguards

10. Your Rights and Choices

Depending on your jurisdiction, you may have the right to:

- Access your personal information
- Correct inaccurate data
- Request deletion or erasure
- Object to or restrict certain processing activities
- Request a copy of your data (data portability)
- Withdraw consent at any time
- Request review of automated processing outcomes where applicable

To exercise these rights, contact [here](#).

11. Cookies and Tracking Technologies

We use cookies and similar technologies to improve platform performance, understand usage patterns, and enhance user experience. You can manage cookie preferences through your browser settings.

12. Data Protection Contact

For privacy enquiries, requests, or concerns, contact:

Email: admin@candoooculture.com

Business Name: Candoo Culture PTY LTD

We will respond within a reasonable timeframe and in accordance with applicable data protection laws.



13. Data Breach Notification

If a data breach occurs that is likely to result in serious harm, we will notify affected individuals and relevant regulatory authorities where required under applicable data protection laws, including Australian and UAE requirements.

14. Updates to This Policy

We may update this Privacy Policy periodically. Where significant changes occur, we will notify users via email or through our website.

The latest version is available [here](#).