



## DATA PRIVACY POLICY

Syncly Pty Ltd (ACN 647 348 543) (**we, us or our**), understands 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 Syncly integration platform (**Services**) or when otherwise interacting with you.

### The information we collect

**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.

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

- **Identity Data** including first name, last name and job title.
- **Contact Data** including billing address, email address and telephone numbers.
- **Financial Data** including bank account and payment card details (through our third party payment processor).
- **Transaction Data** including details about payments to you from us and from you to us and other details of products and services you have purchased from us or we have purchased from you.
- **Technical and Usage Data** including internet protocol (IP) address, your login data, your browser session, 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 website, including through the use of Internet cookies and your communications with our website.
- **Profile Data** including your username and password for our Syncly integration platform, purchases or orders you have made with us, support requests you have made, your interests, preferences, feedback and survey responses.
- **Interaction Data** including information you provide to us when you participate in any interactive features of our Services, including surveys, activities or events.
- **Marketing and Communications Data** including your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Professional data** including where you are a worker of ours or applying for a role with us, your professional history such as your previous positions and professional experience.
- **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. We do not actively request sensitive information about you. If at any time we need to collect sensitive information about you, unless otherwise permitted by law, we will first obtain your consent and we will only use it as required or authorised by law.

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### How personal and sensitive data is managed, used and stored

#### How we collect personal and sensitive data

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

- **Directly:** We collect personal information which you directly provide to us, including when you register for an account, through the 'contact us' form on our website or when you request our assistance via email, or over the telephone.
- **Indirectly:** We may collect personal information which you indirectly provide to us while interacting with us, such as when you use our website, Syncly platform, in emails, over the telephone and in your online enquiries.
- **From third parties:** We collect personal information from third parties, such as details of your use of our website from our analytics and cookie providers and marketing providers. See the "Cookies" section below for more detail on the use of cookies.
- **From publicly available sources:** We collect personal data from publicly available resources such as the Australian Securities and Investment Commission (ASIC) and professional networking sites such as LinkedIn.

### Why we collect, hold, use and disclose personal information

We have set out below, in a table format, a description of the purposes for which we plan to collect, hold, use and disclose your personal information.

Purpose of use / disclosure	Type of Personal Information
To enable you to access and use our software, including to provide you with a login.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> </ul>
To provide our Services to you, including the Syncly integration platform.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> </ul>
To contact and communicate with you about our Services including in response to any support requests you lodge with us or other enquiries you make with us.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Profile Data</li> </ul>
To contact and communicate with you about any enquiries you make with us via our website.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> </ul>
For internal record keeping, administrative, invoicing and billing purposes.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Financial Data</li> <li>• Transaction Data</li> </ul>
For analytics, market research and business development, including to operate and improve our Services and associated applications.	<ul style="list-style-type: none"> <li>• Profile Data</li> <li>• Technical and Usage Data</li> </ul>
For advertising and marketing, including to send you promotional information about the Syncly platform and information that we consider may be of interest to you.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Technical and Usage Data</li> <li>• Profile Data</li> <li>• Marketing and Communications Data</li> </ul>
To offer additional benefits to you.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Profile Data</li> <li>• Interaction Data</li> </ul>

	<ul style="list-style-type: none"> <li>• Marketing and Communications Data</li> </ul>
If you have applied for employment with us; to consider your employment application.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Professional Data</li> </ul>
To comply with our legal obligations or if otherwise required or authorised by law.	<ul style="list-style-type: none"> <li>• Any relevant Personal Information</li> </ul>

### How we store, manage and disclosure personal and sensitive data third parties

We may disclose personal information to:

- our employees, contractors and/or related entities;
- IT service providers, data storage, web-hosting and server providers such as Microsoft;
- marketing or advertising providers such as Mailchimp, Hubspot and WordPress;
- professional advisors, bankers, auditors, our insurers and insurance brokers;
- payment systems operators;
- 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, 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/](http://www.google.com/policies/privacy/partners/) or any other URL Google may use from time to time), or other relevant analytics businesses; and
- any other third parties as required or permitted by law, such as where we receive a subpoena.

**Google Analytics:** We may have enabled Google Analytics Advertising Features. We and third-party vendors may use first-party cookies (such as the Google Analytics cookie) or other first-party identifiers, and third-party cookies (such as Google advertising cookies) or other third-party identifiers together.

You can opt-out of Google Analytics Advertising Features including using a Google Analytics Opt-out Browser add-on found [here](#). To opt-out of personalised ad delivery on the Google content network, please visit Google's Ads Preferences Manager [here](#) or if you wish to opt-out permanently even when all cookies are deleted from your browser you can install their plugin [here](#). To opt out of interest-based ads on mobile devices, please follow these instructions for your mobile device: On android open the Google Settings app on your device and select "ads" to control the settings. On iOS devices with iOS 6 and above use Apple's advertising identifier. To learn more about limiting ad tracking using this identifier, visit the settings menu on your device.

### Overseas disclosure

While we store personal information in Australia, where we disclose your personal information to the third parties listed above, these third parties may store, transfer or access personal information outside of Australia. We will only disclose your personal information overseas 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, 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. If we cannot provide access to your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal. If we can provide access to your information in another form that still meets your needs, then we will take reasonable steps to give you such access.

**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. If we cannot correct your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal.

**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. If you are not satisfied with our response, you also have the right to contact the Office of the Australian Information Commissioner.

## 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.

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 website 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. If and when you choose to provide our online website 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) you may not be able to access all or parts of our website.

## Links to other websites

Our website may contain links to other party's 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 us at:**

Syncly Pty Ltd (ACN 647 348 543)

Email: [privacy@syncly.io](mailto:privacy@syncly.io)

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