



DSPARK AUSTRALIA PRIVACY POLICY

1. Who is DSpark?

DSpark provides a range of data analytics services and related products. This policy describes how your personal information is handled.

DSpark Pty Ltd ABN 23 002 864 897 (**DSpark**) is located in Australia. It is owned by DataSpark Pte Ltd, which has operations in Singapore and other parts of Southeast Asia.

DSpark provides a range of data related services and products. For more information on DSpark's business, the type of work it does using data and the type of clients and partners it has, please see our website, available at www.dsparkanalytics.com.au.

For more information about DataSpark Pte Ltd, including DSpark's relationship with Singtel, see the Singtel website, available at www.singtel.com/about-us/company/company-profile.

In this policy, "**we**", "**us**" or "**our**" means our Australian company only, DSpark Pty Ltd.

2. Our commitment to you and the importance of privacy to us

We respect your right to privacy and are committed to protecting your personal information. We have established a number of safeguards, protocols and processes to help us establish and maintain that commitment.

We must comply the *Privacy Act 1988 (Cth.) (Privacy Act)*, including the Australian Privacy Principles (**APPs**), and other privacy and data protection laws (together, **Australian Privacy Law**).

We take privacy seriously and are committed to ensuring the protection of your personal information, no matter where you are located. We strive to be as open and transparent as possible.

This policy aims to help you understand how we collect, handle, store and use personal information.

3. The use of de-identified, anonymised and aggregated data in our products and services

We are a data company that provides a range of products and services using large volumes of de-identified, anonymised and aggregated data to provide useful insights on where, when, why and how people move.

Our products and services use data relating to the location and movements of people. This mobility data is not Personal Information (as defined under Australian Privacy Law). This data is both de-identified (in that it does not contain personally identifiable information) and

anonymised (in that it cannot be linked back to identifiable records).

We do not de-identify or anonymise the data. It is provided to us de-identified and anonymised, and we do not have the ability to re-identify that data.

Based on this de-identified, anonymised and aggregated, data we provide insights to our clients, in the form of services, reports and technology based products. These insights are about groups of individuals, and not about any one individual. We have in place safeguards, protocols and processes to ensure that our clients are not able to re-identify these insights, and they also undertake not to re-identify these insights.

4. When do we collect personal information and what do we collect?

We collect personal information about you when you deal with us. We may occasionally also collect personal information about you from other people and organisations.

Personal information we collect from you

We collect personal information from you when you inquire about, or use, our products and services, when you deal with us and for recruitment, employment, administration or business operation purposes.

The personal information we collect from you will depend on the functions and activities for which we are collecting that information. This personal information we collect may include:

- information about your identity, including your name, address, date of birth and gender;
- your contact details, including your telephone number and e-mail address;
- your device ID or IP address when you visit our website; and

- other personal information to undertake our business operations, administrations, employment and human resources activities.

Except if required by law, we do not collect sensitive information, such as information about your religion, ethnicity or health.

Personal information we collect from others

Occasionally we collect personal information about you, from others. Where we do, we will ask for your permission.

5. How do we use and share your personal information ?

We use your personal information to deliver and market our products and services and to keep you informed of our products and services. We also use your personal information for other reasons.

We use your personal information so that we can:

- fulfil the administrative function to provide you with, and enable you to use, our products, services;
- improve your experience with us, such as by providing you with customer support;
- maintain our relationship with you, where you have shown interest in us maintaining contact with you;
- market to you, by informing you about our products and services, the industry in which we operate in, seminars and events we are holding, and other direct marketing activities;
- monitor visitors and activities on our website; and
- undertake business operations, administrations, employment and human resources activities.

If you do not want to receive any marketing communication from us, please let us know.

6. Who do we share your personal information with?

We may share your personal information with DataSpark Pte Ltd. We may also share your personal information with other third parties, including the Singtel Group.

DataSpark is part of the Singtel Group, and we may transfer your personal information to other members of the Singtel Group. This is to enable us to deliver and market our products and services, as well as to undertake our business operations, administration, employment and human resource functions.

We may also share your personal information with third parties, to help us deliver our products and services, as well as to undertake our business operations, administration, employment and human resource functions. These third parties may include:

- our service providers, partners and other businesses, including companies such as a cloud service providers, debt collectors, webhosting service;
- banks and financial institutions, for billing and payments purposes;
- our auditors and insurers; and
- current or future employers.

In limited circumstances, we may share your personal information with other persons, such as government agencies, regulatory bodies, law enforcement agencies, and others, where we are entitled or required by law to do so. We may share your personal information where we have a reasonable basis to believe that sharing your information is necessary to protect, enforce or defend the legal rights, privacy, safety or property of you or others, to protect against fraud, for risk management purposes, to comply with the law or legal processes in country or to respond to requests from public and government authorities.

Aside from the above, we will only share personal information with others if you've given us permission, or if the disclosure relates to the main reason we collected

the information, and you'd reasonably expect us to do so.

Sending your personal information overseas

We may send your personal information overseas. Where we do send your personal information overseas, we will ensure that overseas recipients comply with any applicable data protection and privacy laws.

We may share your personal information with our parent company, DataSpark Pte Ltd, whose head office is in Singapore. We may transfer your personal information to other members of the Singtel Group, located in Asia.

If we do send your personal information overseas, we make sure that this transfer is in accordance with all applicable data protection and privacy laws, and we undertake to ensure that the overseas recipient undertakes to put arrangements in place to protect your personal information.

7. How do we protect your personal information and keep it safe?

We have implemented stringent measures to ensure that your personal information is safe, secure and protected. We will keep your personal information for as long as we need it.

We have in place various systems, protocols and procedures to ensure your personal information is safe, secure and protected. These include:

- training our staff on applicable privacy and data security laws and how to keep your personal information safe and secure;
- systems and safeguards to prevent security breaches in our network and database systems. For example, we have firewalls and virus scanning software tools to ensure that your personal information is not accessed by

unauthorised third parties. We also have strict verification processes to prevent any unauthorised access to personal information;

- storing your personal information on secure premises;
- limiting access to personal information to a need-to-know basis;
- destroying or de-identifying any personal information when we no longer need it;
- encrypting, anonymising and aggregating personal information before sharing it; and
- retaining your personal information for only as long as there is a business or legal reason to do so.

8. Accessing your personal information

If you ask us, we will usually give you access to the personal information we hold about you. If the personal information we hold about you is not correct, we will update it, if you let us know.

You can contact us and ask us to provide a copy of the personal information which we hold about you. We will always confirm your identity before giving you a copy of your personal information. For more information on how to contact us, see, section 13.

There is generally no cost for accessing the personal information which we hold about you, unless the request is complex or resource intensive. If there is a charge, it will be reasonable charge, and we will let you know what it is going to be so that you can agree to it, before we proceed with your request.

In some cases, we can refuse to provide you with a copy of the personal information which we hold about you, such as where it is subject to an exception under applicable privacy and data protection law, or where that information is commercially sensitive. Where we

cannot give you a copy of the personal information we hold about you, will provide you reasons.

9. Quality of personal information, updating and correcting it

We aim to keep the personal information we hold about you accurate, up-to-date and complete.

If you think the personal information which we hold about you misleading, incomplete or inaccurate, please contact us. See section 13 on ways to contact us.

If you notify us that the personal information which we hold on you is misleading, inaccurate or incomplete, you may request that we update or correct it, and we will use reasonable efforts to update it and correct it. To the extent that we have received that misleading, incomplete or incorrect personal information from a third party, we will either inform them of this, or provide you with the details of the third party from whom we received that information from. We won't charge a fee for this.

10. How do you make a complaint?

If you have a complaint or concern about your privacy, please let us know, and we will try to fix it.

If you make a complaint to us, we will acknowledge receipt of your complaint, we will make a written record of your complaint and try to investigate and respond to you about your complaint within 30 days.

If you are unhappy with the outcome, and your complaint is about the way in which we handle your personal information, you can contact the Office of the

Australian Information Commissioner, which is available at:

Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001
Australia

Phone: 1300 363 992

oaic.gov.au

11. General Information

We may amend or modify this Privacy Policy from time to time, such as in response to changes to legislation. We remain committed to safeguarding your personal information and being open about our data protection practices.

12. Optus Privacy Policy and Singtel Data Protection Policy

For the avoidance of doubt, Singtel has its own Data Protection Policy and Optus has its own Privacy Policy. Those policies do not apply to us and does not describe the way in which we collect, handle, store and use personal information.

13. Questions?

To ask a question, make a query in relation to this Privacy Policy, to access your personal information, or to make a correction or a complaint, please feel free to contact our Privacy Officer at:

Email: privacy@dsparkanalytics.com.au

DSpark Pty Ltd
1 Lyonpark Road
Macquarie Park
NSW 2113

14. Updates

We update our privacy policy from time to time. The most up to date version of this policy is available on our website.