

SAFELY PRIVACY POLICY

Last updated: 30 March 2020

Safely Holdings Pty Ltd ABN 75 637 709 954 (**Safely, we, us or our**) is committed to protecting the personal information of individuals who use the Safely mobile application (the **Safely App**), and related services (**Services**).

We have created this Privacy Policy to demonstrate our commitment to the Australian Privacy Principles (**APPs**) contained in the Privacy Act 1988 (Cth) (**Privacy Act**). The APPs govern the way in which we collect, use, disclose, store, secure and dispose of your personal information.

To the extent that we offer products and services to individuals in the European Union and the United Kingdom (Great Britain and Northern Ireland), or otherwise monitor the behaviour of individuals in the European Union and the United Kingdom (Great Britain and Northern Ireland), this Privacy Policy sets out how we comply with the European Union's *General Data Protection Regulation* (**GDPR**). For the purposes of the GDPR, we are both a 'data controller' and a 'data processor' of personal information and are responsible for how personal information is collected and used.

For the purposes of this Privacy Policy, **personal information** has the meaning currently given in the Privacy Act. In general terms, personal information includes information or an opinion (whether true or not) that identifies an individual.

By using the Safely App and/or accessing and/or using the Services you agree, and where required, consent, to the collection, use and disclosure of your personal information as set out in this Privacy Policy.

If you do not agree to us collecting, using and disclosing your personal information as set out in this Privacy Policy, then you should not use the Safely App or access or use the Services or submit any personal information to us.

What types of personal information do we collect?

The types of personal information we collect depends on the type of dealings you have with us and includes information that is needed to facilitate the operation of the Safely App and Services. This may include, but is not limited to, any or all of the following information about you:

- name;
- mailing and electronic address(es);
- telephone number;
- information about the device you use to access and use the Safely App and/or the Services;
- access logs and system usage information;
- location data (only where you have authorised your mobile device to send such information via the privacy settings on that device);
- background account information such as user settings; and
- any other information you elect to upload or provide to us as part of using the Safely App or the Services.

How do we collect your personal information?

We primarily collect personal information directly from you when you use the Safely App, or access or use the Services, including when you set up a user account with us. We may also collect personal information from you when you have other dealings with us, for example, if you participate in any user surveys, send us post incident details or otherwise provide us with feedback.

We also collect information automatically through your use of the Safely App and/or the Services. This includes information we receive from devices you use when you use the Safely App or access or use the Services, including from third party providers such as Google Analytics. We use cookies, web beacons, unique identifiers and similar technologies to collect information regarding your interaction

with the Safely App and/or the Services. When you use the Safely App or our Services, details may be recorded about your use.

We may also collect your personal information from third parties if you have consented to this.

Why do we need your personal information?

Generally, we will tell you why we are collecting your personal information when we collect it and we will also tell you how we plan to use it, or this will otherwise be obvious when we collect the information. We will only use your personal information for the purpose disclosed, or otherwise as set out in this Privacy Policy.

We will not use your personal information for any other purpose without first seeking your consent, or otherwise where authorised or required by law.

We only collect or hold your personal information where it is reasonably necessary for our business functions or activities.

In particular, we require your personal information:

- to provide you with the Safely App and the Services and other products and services and to improve the quality and design of them;
- to provide you with customer support;
- to establish and maintain our relationship with you by, among other things, providing updates on promotions, products and services we think may be of interest to you;
- to comply with legal requirements and to exercise our legal rights;
- to conduct user surveys and research and measure user satisfaction;
- for business analysis purposes and internal accounting and administration purposes; and
- to market and advertise to you including by sending you newsletters, alerts, special offers or promotions (except where you have 'opted-out' – see further information relating to direct marketing below),

(the **Primary Purposes**).

You do not have to provide us with any personal information, however if you do not, we may not be able to carry out some or all of the Primary Purposes.

How do we use or disclose your personal information?

By submitting your personal information to us, you consent to us using or disclosing your personal information for:

- the Primary Purposes set out above; and
- any purpose related to the Primary Purposes that could be reasonably anticipated at the time your personal information was collected.

We may also use and disclose your personal information:

- with your consent;
- where we are authorised or required to do so by law;
- to our related entities, third party partners or third party service providers who work with us in our business (for example, website hosting and cloud service providers, payment processors, security service providers and support service providers), to provide, promote or improve our products and services (including the Safely App and the Services);
- where reasonably necessary to assist a law enforcement agency; and
- as permitted under the APPs.

Disclosure of personal information outside Australia

Note that some of our related entities, partners and service providers (or the services they provide) may be based outside Australia (including in the United Kingdom, the European Union and the United States of America). By providing us with your personal information, you acknowledge that your personal information may be used, stored and disclosed overseas, including in jurisdictions that may not provide equivalent levels of data protection as your home jurisdiction.

Use and disclosure of personal information in anonymised and aggregated form

In some cases, we may use and share personal information in anonymised and aggregated form to improve the quality and design of our products and services. This statistical compilation and analysis of information may also be used by us or provided to others as a summary report for marketing, advertising, financing or research purposes.

We may also share non-personally identifiable information publicly and with our partners, financiers and prospective buyers. For example, we may share information publicly to show trends about the general use of the Safely App or the Services or demographic spread of our customers.

Use of your personal information for direct marketing

Where we have your express or implied consent, or where we are otherwise permitted by law, we may use your personal information to send you information about promotions, products or services we offer, as well as other information. We may send this information by mail, email, SMS and telephone or via an in-app notification.

If you no longer wish to receive these communications, you may opt out at any time by using the unsubscribe facility that we use in our commercial electronic messages (via email or SMS). Alternatively, you may contact us at <http://support.safely.io>.

Public information

Any information posted by you on review forums or communicated in chat areas becomes public information and we therefore cannot guarantee the security of this information. We are not responsible for personal information (or other information) you chose to submit in such forums.

Can you use a pseudonym or remain anonymous?

We will allow you to use a pseudonym or to remain anonymous unless this is impractical or against the law.

In some instances, if you do not provide us with certain personal information we may not be able to provide you with the relevant product, service or information you have requested.

How do we store and protect your personal information?

The security of your personal information is important to us and we take all reasonable steps to keep your personal information secure and ensure it is protected against misuse, loss, unauthorised access, modification or inappropriate disclosure.

We follow generally accepted industry standards to store and protect the personal information submitted to us, both during transmission and once we receive it. For example, we store personal information in computer storage facilities and use appropriate website protection measures such as firewalls and anti-virus software, security restrictions on access to our computer systems, and controlled access to our corporate premises. We will store your personal information in accordance with applicable law after which we take reasonable steps to destroy or permanently de-identify personal information when we no longer need it. We will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

If we are involved in a merger, acquisition, asset sale or change in control, we will use our reasonable endeavours to continue to ensure the confidentiality of any personal information and provide affected users' notice before personal information is transferred or becomes subject to a different privacy

policy. We reserve the right to transfer or assign the information we have collected as part of such merger, acquisition, sale or other change in consent and you consent to the transfer of your personal information in such circumstances.

How long will we keep your personal information?

We retain your personal information for as long as necessary to fulfil the purposes for which we collected it unless a longer period is required or permitted by law.

If you tell us that you do not wish to receive marketing communications, we will keep this information about you until you tell us otherwise. This is to ensure that we do not send you any further marketing communications in error.

Using other sites

Our products may contain links to other websites, platform or applications. Unless the other website, platform or application is one of our products, we are not responsible for the privacy practices of the owners of those websites, platforms, or applications. We recommend that you read the privacy policy of any website, platform, or application that asks you to provide Your Information.

Accessing and correcting your personal information

We will use our reasonable endeavours to keep your personal information accurate, complete and up to date. To assist us, you must provide true, accurate, current and complete information about yourself as requested.

If you wish to access the personal information that we hold about you (including a summary of your personal information we hold), then you may make a request via <http://support.safely.io>. For your protection, we may require you to confirm your identity before access to your personal information is granted.

We will endeavour to respond to your request within a reasonable timeframe (but not more than 30 days). If we need more time, we will seek to agree a longer period of time with you. If you do not agree, we may not be able to address your request.

We will give you access to or correct your personal information unless there is a lawful reason for refusing your request. If we deny access, we will provide you with the reason for such denial. We may reject requests that are unreasonably repetitive, require disproportionate technical effort, risk the security of our products or services or the privacy of others, or are otherwise impracticable.

In most cases, we can provide you with a summary of your personal information free of charge. However, in some circumstances, we may recover from you our reasonable costs of supplying you with access to your personal information, subject to the Privacy Act and any other relevant laws.

In some instances, you may request that we delete your personal information. In accordance with and subject to relevant privacy laws (including the Privacy Act and the GDPR), you may object to certain personal information being processed and request that processing of your personal information to be limited.

Users based in Europe

If you access our products or services from Europe, you may have additional rights under the GDPR in relation to the handling of your personal information.

When you use the Safely App and/or access or use the Services, we may monitor your activity using automated processes.

In certain circumstances, in addition to the rights listed in the 'Access and correcting your personal information' section above, you may also have a right to:

- request a copy of personal information that that you have provided to us, in a commonly used electronic format;

- request that we delete any personal information that we hold about you, subject to any legal obligations we have to retain your personal information; and
- withdraw your consent to the processing of the personal information that we hold about you. Once you have withdrawn your consent, we will no longer process your personal information for the purpose(s) you originally agreed to, unless we are required to do so by law. This will not affect the lawfulness of any processing of personal information based on your consent before its withdrawal.

Where your personal information is transferred outside of Europe, it will only be transferred to countries that have been identified as providing adequate protection for personal information, or to a third party where we have approved transfer mechanisms and/or contractual obligations in place to protect your personal information.

Queries and complaints

If you have any questions or complaints, please contact us at <http://support.safely.io>.

If we cannot resolve a complaint related to your personal information, you may wish to contact the Office of the Australian Information Commissioner (**OAIC**) directly. See www.oaic.gov.au for further information.

Changes to our Privacy Policy

We may make changes or updates to this Privacy Policy at any time. We will publish any updated Privacy Policy at www.safely.io/ and otherwise take reasonable steps to notify you of any changes, most likely via an in-app notification.

It is your responsibility to review our Privacy Policy regularly and make sure you keep up to date with any changes.