

Privacy Policy

1. General

- 1.1. This Privacy Policy ("Policy") explains in general terms how Klient Culture protects the privacy of your personal information and collects, stores, uses and discloses your personal information.
- 1.2. We have developed this Policy in line with the Australian Privacy Principles in Schedule 1 of the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* (Cth) ("Privacy Act").
- 1.3. We are firmly committed to protecting the privacy and confidentiality of personal information and maintain robust physical, electronic and procedural safeguards to protect personal information in our care.
- 1.4. We are committed to the protection, privacy and security of your personal information.
- 1.5. This Policy applies in general terms to the collection, storage, use and disclosure by us of your personal information, how you may access personal information that we keep or complain about a suspected privacy breach.

2. What is personal information?

- 2.1. Personal information is information about an individual whose identity is apparent or can reasonably be ascertained from the information.

3. Collection of your personal information?

- 3.1. Generally, we will collect information when we invite you to complete surveys or questionnaires on behalf of a service provider of yours.
- 3.2. We may also collect information directly from a service provider of yours, in accordance with our terms of service. We take reasonable steps to ensure that, prior to us collecting any information, the service provider has notified you of their desire

to do this and has provided you with a copy of this Privacy Policy, giving you the opportunity to decline to participate.

- 3.3. We do not use or share your personal information for any purpose other than for the purpose for which it was disclosed, typically, for the use of a discreet service provider of yours, collected with the intention of improving their service to you.

4. What personal information do we collect?

- 4.1. The type of personal information we collect about you depends on the type of information that is needed to facilitate the operation of our client feedback platform, but is, typically, limited to your name, email address and other incidental information.
- 4.2. We do not wish to collect information which is sensitive information as defined under the Privacy Act.

5. How do we use personal information?

- 5.1. We will not use your personal information for our own purposes.
- 5.2. We will only use your personal information to provide your feedback to the discreet service provider of yours on whose behalf we have conducted a survey.

6. Is the information disclosed to third parties?

- 6.1. Where we engage third party contractors to perform services for us, those third party contractors may be required to handle your personal information. Under these circumstances those third party contractors must safeguard this information and must only use it for the purposes for which it was supplied.
- 6.2. Other than as set out in this Policy or a collection notice, we will not disclose your personal information without your consent unless disclosure is necessary to prevent a threat to life or health, authorised or required by law, regulation, legal process, governmental request or industry code, or otherwise reasonably necessary to enforce the law or necessary to investigate a suspected unlawful activity.
- 6.3. In all circumstances where your personal information is disclosed, we will ensure that these third parties undertake to protect your privacy.
- 6.4. In the event of a merger, acquisition, sale of the whole or part of our business or restructure, we reserve the right to transfer your personal information as part of any such transaction. However, your personal information would remain subject to this Policy.

7. Cross-border data flows

- 7.1. We advise that our client feedback platform is hosted within Australia.

- 7.2. Nevertheless, in providing our products or services to you it may be necessary for us to forward your personal information to relevant overseas third party service providers (see 6.1 above).
 - 7.3. Prior to the disclosure of personal information to a person overseas, we will take such steps as reasonable in the circumstances to ensure that the overseas recipient treats your personal information securely and otherwise complies with the relevant Australian Privacy Principles in relation to the personal information.
8. Security of information
 - 8.1. Klient Kulture has implemented physical, electronic and managerial security procedures (including SSL encryption) and will use its reasonable endeavours to protect personal information from loss, misuse, alteration or destruction. Klient Kulture regularly reviews security and encryption technologies and will strive to protect information to the fullest extent possible.
 - 8.2. Despite our reasonable endeavours, we are of course unable to guarantee the security of any personal information transmitted to us.
9. Access and correction of personal information
 - 9.1. We will use our reasonable endeavours to keep your personal information that we collect accurate, up-to-date and complete within 21 days of receipt of your enquiry. Subject to the exceptions set out in the Privacy Act, we invite you to access and correct any personal information we may hold on you by contacting privacy@klientkulture.com.
 - 9.2. If we deny access, we will provide you with the reason for such denial. Proof of identity may be required before such information will be provided.
10. Use of cookies
 - 10.1. A cookie is a small piece of text that is placed within the memory of a computer and can be later retrieved by web page servers. When you visit our website, details are recorded about your visit, such as time and date, your server address, pages accessed, time spent and type of browser so that next time you visit our website we remember your login details. This information is used in an anonymous form for statistical purposes and as such cannot identify you individually. We use cookies to enhance your interaction and convenience with our website and do not use cookies to record any personal information. If you do not wish to use cookies, you can adjust the settings on your browser to reject cookies or notify you when they are being used. If you reject our cookies, you may still use our website, but you may be limited in the use of some of the features and this may affect the functionality of our website.

11. Feedback and complaints

11.1. We welcome your inquiries or comments about our Policy. Should you have any comments or complaints please email privacy@klientkulture.com.

11.2. We will endeavour to:

11.2.1. provide an initial response to your query or complaint within 10 business days.

11.2.2. investigate and attempt to resolve your query or complaint within 30 business days or such longer period as is necessary and notified to you by our Privacy Officer.

12. Changes to our policy

12.1. From time to time it may be necessary for us to review and revise this Policy. We reserve the right to change our Policy at any time, should this occur the amendment would be posted on our website. Your continued use of our products, services or website following any such amendment will be confirmation of your acceptance of the amendments. We reserve the right to modify this Policy at any time, so please review it frequently.