

Privacy Policy

Version 1.

This is the privacy policy of Red and Black Group Pty Ltd and Spec Up (“we”, “us”) regarding the collection, use and disclosure of your personal information when you use our products and services.

Our privacy policy has been prepared to meet the requirements of the *Privacy Act 1988 (Cth)* as amended from time to time and the related Privacy Laws (including the Act, the Australian Privacy Principles, codes, rules, or determinations, and the General Data Protection Regulation (EU 2016/79) in our dealings with businesses or individuals based in the European Union (GDPR). To the extent that this policy is inconsistent with the Privacy Laws or GDPR, the Privacy Laws and GDPR shall prevail in the relevant jurisdiction.

We will not use or share your information with anyone except as described in this Privacy Policy.

We use your personal information for providing and improving our products and services.

1. Information Collection and Use

1.1 Personal Information

While using our products and services, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include, but is not limited to, your email address, name and any correspondences we may have with you (“Personal Information”).

The purpose for which we collect Personal Information is to provide you with the best experience possible using our products and services and for our internal business purposes that form part of normal business practices. This purpose includes (but is not limited to), ensuring that any content we provide to you is presented in an effective manner, providing you with alerts, newsletters, education materials or information that you have requested or have signed up to, allow you to participate in interactive features of our service, when you choose to do so, designing and conducting surveys/questionnaires and collection of statistics in order to improve and further the provision of our products and services.

We may use your data in direct marketing. By using our site, unless you tell us otherwise, you agree that your Personal Information may be used to market our products and services to you, invitations to events such as seminars, webinars, conferences and other live programs or events. When we collect Personal Information, we will seek informed consent for the collection and use of the data at the same time. You may withdraw your consent at any time. Communication may be undertaken via email, direct mail, or telephone.

Some provision of personal information is optional. However, if you do not provide us with certain types of personal information, you may not be able to enjoy the full functionality of our products and services.

1.2 Log Data

We may collect information that your browser sends whenever you visit our website (“Log Data”). This Log Data may include information such as your computer’s internet protocol (“IP”) address, browser type, browser version, the sections of our website that you use, the time and date of your usage and other statistics.

In addition, we may use third party services such as Google Analytics and Web Visitors that collect, monitor and analyse this type of information in order to increase the functionality of our products and services. These third-party service providers have their own privacy policies addressing how they use such information.

1.3 Cookies

Cookies are files with small amounts of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your hard drive.

We use “cookies” to collect information that may provide to third party services. This information includes behavioural data of all website visitors, including pages viewed, visitor source and time spent on site. The visitor IP address is collected to detect the company and geographic location. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our products and services.

2. Compliance with Laws

We may disclose Personal Information in special situations where we have reason to believe that doing so is necessary to identify, contact or bring legal action against anyone damaging, injuring or interfering with our rights or property, users or anyone else who could be harmed by such activities.

We may also disclose your Personal Information where we are required to do so by law or subpoena or if we believe such action is necessary to comply with the law and the reasonable requests of law enforcement or to protect the security or integrity of our products and services.

3. Security

The security of your Personal Information is important to us, however, no method of transmission over the internet or method of electronic storage is 100% secure. We will use all commercially acceptable means to protect your Personal Information, however, we cannot guarantee its absolute security.

4. International Transfer

Your information, including Personal Information, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside Australia and choose to provide information to us, please note that we transfer the information, including Personal Information, to Australia and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

5. Access and Correction

Australian Privacy Principle 6 of the *Privacy Act 1988 (Cth)* allows you to get access to, and correct, the personal information we hold about you in certain circumstances. If you would like to obtain such access, please contact us on the details set out above.

Please note that the access and correction requirements under this Privacy Policy operates alongside and do not replace other informal or legal procedures by which an individual can be provided access to, or correction of, their personal information, including the requirements under the *Freedom of Information Act 1982 (Cth)*.

6. Complaints

Australian Privacy Principle 1 of the *Privacy Act 1988 (Cth)* allows you to make a complaint about any alleged breaches of privacy. In order to lodge a complaint with us, please contact us on michael@andever.com.au with the following information:

- your name and address;
- details of the alleged breach of privacy; and
- URL link to the alleged breach of privacy (if applicable).

Please allow us 30 days to investigate your complaint, after which we will contact you immediately to resolve the issue.

7. Retention of Information

We retain information for as long as required, allowed or we believe it useful, but do not undertake retention obligations. We may dispose of information in our discretion without notice, subject to applicable law that specifically requires the handling or retention of information. We recommend you keep your own, separate back-up records.

8. Links to Other Sites

Our products and services may contain hyperlinks to other sites that are not operated by us. If you click on a third-party hyperlink, you will be directed to that third party's site. We advise you to review the privacy policy of every site you visit. We have no control of and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

9. Business Transaction

In the event that we sell or buy businesses or their assets, or engage in transfers, acquisitions, mergers, restructurings, changes of control and other similar transactions, we may provide your personal information to the acquirer or other such third party. In the event of insolvency, personal information may be transferred to a trustee or debtor in possession.

10. Changes to this Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a notice on our website.

11. Consent

You warrant that you are able to give consents under Australian Law. You hereby expressly and voluntarily grant your informed consent to us to deal with your personal information in accordance with the terms and conditions of this Privacy Policy. Should you retract your consent, please contact us. If you retract your consent, you acknowledge and agree that failure to provide certain types of personal information may not give you access to the full functionality of our products and services.