



## PRIVACY POLICY

### secd3v Website and Web Service

The secd3v website (**Site**) and web service (**Service**) are operated by secd3v Pty Ltd, ABN 88 663 430 224 (we, our or us). The secd3v Site is available through: <https://www.secd3v.com.au>, and the Service is available at: <https://portal.secd3v.com.au>, <https://support.secd3v.com.au>, and organisation web addresses (for integrated networks). secd3v may also be available through other addresses or channels.

Consent: By accessing and/or using our Site or Service, you agree to the terms of this Privacy Policy.

Variations: We may, at any time and at our discretion, vary the terms of this Privacy Policy by publishing the updated policy terms on our Site. We recommend you check our Site regularly to ensure you are aware of our current terms. Materials and information on this Site and Service (**Content**) are subject to change without notice. We do not undertake to keep our Site or Service up-to-date and we are not liable if any Content is inaccurate or out-of-date.

Personal information we collect: The types of information we collect depends on the nature of our engagement with you and your interactions with the Site or Service. Examples of personal information we may collect from our Site include:

- your Internet Protocol (IP) address
- usage metrics and Site navigation information
- contents of messages and/or attachments you may provide to us
- any other information you may choose to provide.

In providing you access to our Service we may also collect the following personal information:

- information in identification documents (for example: passport or driver's licence)
- phone number
- date of birth and gender
- payment and billing details
- your Internet Protocol (IP) address
- usage details and licensing arrangements
- usage metrics and Service navigation information



- contents of messages and/or attachments you may provide to us, and
- any other information you may choose to provide

It may be necessary in some circumstances for us to collect sensitive information about you in order to provide specific items within our Service. Examples of the types of sensitive information that may be collected in such circumstances include professional memberships or some aspects of biometric information.

It is generally not practical to remain anonymous or to use a pseudonym when dealing with our Service as usually we need to use your personal information to provide specific services to you, or which relate to or involve you.

How we collect personal information: Generally, we collect your personal information from you directly (for example, when we deal with you in person or over the phone, when you send us correspondence, including via email, when you access a portal, complete a questionnaire, form or survey, when you subscribe to our publications or when you use our Site or our social media).

We may also collect personal information about you from your use of our websites and information you provide to us through contact mailboxes or through the registration process on our Site or Service.

Where you provide us with personal information about someone else: If you provide us with someone else's personal information, you should only do so if you have their authority or consent to provide us with that information. You should also take reasonable steps to inform them of the matters set out in this Privacy Policy or any Privacy Collection Statement we give you.

If you become aware of any breach within the meaning of any applicable privacy law relating to personal information about someone else that you have provided us, you must notify us of the breach and cooperate with us in any investigation of the breach and the implementation of any measures reasonably required to be taken in response to the breach.

Holding personal information: We hold personal information predominately in electronic format and take security measures to protect the personal information we hold including physical (for example, access-controlled offices) and technological (for example, restriction of access, firewalls, the use of encryption, passwords and multi-factor authentication).



We also have policies and processes which govern document retention and data breach incidents. In some cases, we engage third parties to host electronic data (including data in relation to the Service we provide) on our behalf.

Purpose for collecting, holding and disclosing personal information: We collect, hold and use personal information for a number of purposes, including but not limited to:

- to create your account, identify and authenticate your access to the Site and/or Service and provide you with the Service you have requested
- to process your payment for the Service you have purchased
- to provide and enhance our Site and Services
- to provide personalised experiences
- to conduct user research and development
- to respond to requests or queries and send you information you have requested
- to maintain contact with our clients and other contacts, and keep them informed of our services, industry developments, seminars and other events
- to verify your identity
- for other administrative purposes
- for recruitment purposes
- for purposes relating to the employment of our personnel, providing internal services or benefits to our partners and staff and for matters relating to the partnership
- when engaging service providers, contractors or suppliers relating to the operation of our business
- to manage any conflict of interest or independence (including auditor independence) obligations or situations
- to conduct surveys
- for seeking your feedback
- to meet any regulatory obligations, or
- to develop our expertise and know how, for benchmarking purposes, analytics, quality assurance and thought leadership, and other purposes related to our business
- to protect the rights, safety and property of secd3v, you, or any third-party
- for other purposes, for which we obtain your consent.

As part of an engagement, if you are a customer, an employee, a contractor or supplier of services to one of our clients, then we may disclose your personal information as part of providing services to that client.



The types of third parties to whom we may disclose your personal information include:

- experts or other third parties contracted as part of an engagement
- our agents, third party contractors and suppliers
- our professional advisers
- government or regulatory bodies or agencies, as part of an engagement or otherwise.

We do not disclose personal information to third parties for the purpose of allowing them to send marketing material to you. However, we may share non-personal, de-identified or aggregated information with select third parties for research or promotional purposes other than direct marketing.

Direct marketing: We may use your personal information for the purpose of marketing our Service, Service enhancements, or other products and services to you. If you do not wish to receive marketing material from us, you can contact us on the information detailed below:

- for electronic communications, you can click on the unsubscribe function within our communications, or
- for hard copy communications, you can email [unsubscribe@secd3v.com.au](mailto:unsubscribe@secd3v.com.au), or
- through our contact details at the end of this policy

Privacy on our Site and Service: Automatic collection of personal information occurs through cookies, web beacons and other technology used by us and our service providers on our Site. This can also occur through email and allow us to automatically collect certain types of information. The collection of this information allows us to customise your online experience (including tailored marketing), to improve the performance, usability and effectiveness of our online presence and to measure the effectiveness of our marketing activities.

If you register or log into a Site or Service and provide information about your preferences, we will use your information to personalise your user experience. If you register or log into a Site using a third party account (such as LinkedIn, Apple, Google or Twitter), we may collect any information you have permitted the third party service to share, including your name and email address, depending on the privacy settings you have set with the third party service and their privacy policy.

IP address: An IP address is a number assigned to your computer whenever you access the internet. It allows computers and servers to recognise and communicate with one another.



Public IP addresses from which visitors appear to originate may be recorded for IT security and system diagnostic purposes. This information may also be used in aggregate form to conduct Site or Service trend and performance analysis, and to enhance user experiences.

**Cookies:** Like any other website, our Site uses 'cookies'. These cookies are used to store information including visitors' preferences, and the pages on the website that the visitor accessed or visited. The information is used to optimise the users' experience by customising our web page content based on visitors' browser type and/or other information.

Although most browsers automatically accept cookies, you can choose whether to accept cookies via your browser's settings (often found in your browser's Tools or Preferences menu).

You may also delete cookies from your device at any time. However, please be aware that if you do not accept cookies, you may not be able to fully experience some of our Site or Service features.

Cookies by themselves do not tell us your email address or otherwise identify you personally. In our analytical reports, we may obtain other identifiers including public IP addresses, but this is for the purpose of identifying the number of unique visitors to our web sites and geographic origin of visitor trends and is not used to identify individual visitors.

For more general information on cookies, please read: [What are cookies.](#)

**Analytic tools:** The Site and Service uses analytics tools, such as Google Analytics and Salesforce Service Analytics. To provide website visitors with more choice on how their data is collected by Google Analytics, Google has developed the [Google Analytics Opt-out Browser Add-on](#).

The add-on communicates with the Google Analytics JavaScript (ga.js) to indicate that information about the website visit should not be sent to Google Analytics.

The Google Analytics Opt-out Browser Add-on does not prevent information from being sent to the Site itself or to other web analytics services.

More information about how Google Analytics is used can be found in the [Google Terms of Service](#) and more information about [Salesforce Service Analytics](#).

**Web beacons:** A web beacon is a small image file on a web page that can be used to collect certain information from your computer such as an IP address, the time that content was viewed, a browser type, and the existence of cookies previously set by the same server.



The Site or its service providers may use web beacons to track the effectiveness of third-party websites that provide us with recruiting or marketing services or to gather aggregate visitor statistics and manage cookies.

You have the option to render some web beacons unusable by rejecting their associated cookies. The web beacon may still record an anonymous visit from your IP address, but cookie information will not be recorded.

In some of our newsletters and other communications, we may monitor recipient actions such as email open rates through embedded links within the messages. We collect this information to gauge user interest and to enhance future user experiences.

Location based tools: The Site may collect and use the geographical location of your computer or mobile device. This location data is collected for the purpose of providing you with information regarding services which we believe may be of interest to you based on your geographic location, and to improve our location-based products and services.

Social media widgets and applications: Some aspects of the Site may include functionality to enable information sharing via third party social media applications, such as the Facebook Like button, Twitter widget and LinkedIn reshare.

These social media applications may collect and use information regarding your use of the Site. Any personal information that you provide via such social media applications may be collected and used by members of that social media application separate to us.

Such interactions that are monitored by social media applications are governed by the privacy policies of the relevant companies that provide the applications. We do not have control over, or responsibility for, those companies or their use of your information.

In addition, our Site or affiliate websites may host blogs, forums, crowd-sourcing and other applications or services (collectively "social media features"). The purpose of social media features is to facilitate the sharing of knowledge and content.

Any personal information that you provide on any of our social media features may be shared with other users of that social media feature (unless otherwise stated at the point of collection), over whom we may have limited or no control.



**Log files:** Our Site logs visitor details when you access our Site. All hosting companies do this as part of hosting services' analytics. The information collected by log files include IP addresses, browser type, Internet Service Provider (ISP), date and time stamp, referring/exit pages, and possibly the number of clicks. These are not linked to any information that is personally identifiable. The purpose of the information is for analysing trends, administering the site, tracking users' movement on the website, and gathering demographic information.

Our Service follows a standard procedure for the collection of log files across various areas such as Service operations (procurement, payment, use and subscription maintenance of the Service), performance, user interaction with the Service and applications, and security events. The information collected by these log files may include Service components used, date and time stamp, session duration, name(s), usernames, email address, passwords, device type, operating system, browser types, language settings, IP address, network name.

**Links to third party websites:** The Site and Service may contain links to third parties' websites, including sites maintained by our affiliates and partners. Those other websites are not subject to our privacy policy and procedures. You will need to review those websites to view a copy of the relevant privacy policy.

Unless expressly advised, we do not endorse, approve, or recommend the services or products provided on third party websites.

**Third party privacy policies:** Our Site Privacy Policy does not apply to other advertisers or websites. Thus, we are advising you to consult the respective Privacy Policies of these third-party ad servers for more detailed information. It may include their practices and instructions about how to opt-out of certain options.

You can choose to disable cookies through your individual browser options. To know more detailed information about cookie management with specific web browsers, it can be found at the browsers' respective websites.

**Advertising partners privacy policies:** Third party ad servers or ad networks use technologies like cookies, JavaScript, or Web Beacons that are used in their respective advertisements and links that appear on the Site, which are sent directly to users' browser. They automatically receive your IP address when this occurs. These technologies are used to measure the effectiveness of their advertising campaigns and/or to personalise the advertising content that you see on websites that you visit.

Note that the Site has no access to or control over these cookies that are used by third party advertisers.



Your choices: You have several choices regarding your use of our Site or Service. In general, you are not required to provide personal information when you visit our Site or Service. However, if you make an enquiry or subscribe to receive information about our services, events and industry updates or wish to submit a service ticket, provision of certain personal information will generally be required to facilitate such requests.

Our Service may require you to provide and maintain personal information for the purpose of maintaining, accessing or utilising a subscription, the Service and the associated licensing and services.  
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California Consumer Privacy Act( CCPA) privacy rights (do not sell my personal information): Under CCPA, among other rights, California consumers have the right to:

- Request that a business that collects a consumer's personal data disclose the categories and specific pieces of personal data that a business has collected about consumers.
- Request that a business delete any personal data about the consumer that a business has collected.
- Request that a business that sells a consumer's personal data, not sell the consumer's personal data.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us.

GDPR data protection rights: We would like to make sure you are fully aware of all your data protection rights. Every user is entitled to the following:

- The right to access – You have the right to request copies of your personal data. We may charge you a small fee for this service.
- The right to rectification – You have the right to request that we correct any information you believe is inaccurate. You also have the right to request that we complete the information you believe is incomplete.
- The right to erasure – You have the right to request that we erase your personal data, under certain conditions.
- The right to restrict processing – You have the right to request that we restrict the processing of your personal data, under certain conditions.
- The right to object to processing – You have the right to object to our processing of your personal data, under certain conditions.





- The right to data portability – You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us through our 'How to contact us' section.

Gaining access to personal information we hold: You can request access to your personal information, subject to some limited exceptions as permitted or required by law. Such a request must be made in writing to our Privacy Liaison. Please see the 'How to contact us' section for details.

Keeping personal information current: If you believe that any personal information we have collected about you is inaccurate, not up-to-date, incomplete, irrelevant, or misleading, you may request correction. To do so, please contact our Privacy Liaison and we will take reasonable steps to correct it in accordance with the requirements of the Privacy Act. Please see 'How to contact us' for details.

Our Site does not knowingly collect any Personal Identifiable Information from children under the age of 13. If you think that your child provided this kind of information on our website, we strongly encourage you to contact us immediately and we will do our best efforts to promptly remove such information from our records.

Complaints: If you wish to make a complaint to us about our handling of your personal information, you can contact our Privacy Liaison as set out in 'How to contact us'. Following your initial contact, you will be asked to set out the details of your complaint in writing in a form provided.

We will endeavour to reply to you within 30 days of receipt of the completed complaint form and, where appropriate, will advise you of the general reasons for the outcome of the complaint.

In some circumstances, we may decline to investigate the complaint (for example if the complaint relates to an act or practice that is not an interference with the privacy of the person making the complaint).

If you are not satisfied with the outcome of your complaint, you can refer your complaint to the Office of the Australian Information Commissioner.



How to contact us: If you have a query in relation to this Privacy Policy, or would like to notify us that you: no longer wish to receive marketing material from us, wish to want to access or correct your personal information or wish to make a complaint about our handling of your personal information; please contact us as follows:

Privacy Liaison

secd3v Pty Ltd

Email: [privacy@secd3v.com.au](mailto:privacy@secd3v.com.au)

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