

CrowdSpot Privacy Policy

This Privacy Policy describes how CrowdSpot Pty Ltd (ABN 36 160 702 296) (**CrowdSpot**) collects and uses your personal information.

CrowdSpot is a technology and geo-spatial consultancy which advises on and delivers technological solutions and data driven reports to its clients combining urban planning, digital media and geo-science service offerings (**CrowdSpot Services**).

CrowdSpot respects the rights and privacy of all individuals engaging with the CrowdSpot Services and is committed to complying with the *Privacy Act 1988* and the Australian Privacy Principles and protecting the personal information CrowdSpot holds.

By providing your personal information (defined below) to CrowdSpot, you consent to CrowdSpot using, storing and disclosing that personal information in accordance with this Privacy Policy.

If you do not agree to the terms of this Privacy Policy, we recommend that you leave the CrowdSpot website and do not engage with us and our services and other offerings.

This Privacy Policy is provided free of charge. If you wish to obtain the Privacy Policy in another form (e.g. translated or TTY), please contact CrowdSpot on the details below to discuss your needs.

What is personal information?

“Personal information”, as defined in the Privacy Act 1988 (Cth), means information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable.

Personal information collected by CrowdSpot includes the kinds of personal information set out in this Privacy Policy below.

Why does CrowdSpot collect personal information?

In order to provide and deliver the CrowdSpot Services, CrowdSpot needs your personal information. A critical part of the CrowdSpot Services involves CrowdSpot consulting with and obtaining your views on various projects that CrowdSpot is running. This can be done through CrowdSpot’s website, its applications and other various platforms.

CrowdSpot also needs your personal information to perform the other functions and purposes set out in this Privacy Policy (see below) – for example administering its relationship with you.

How does CrowdSpot collect your personal information?

Personal information can be collected in a number of ways and through a number of mediums, for example:

- (a) when you provide your personal information, or agree to your personal information being provided via one of CrowdSpot’s websites or smart phone applications;
- (b) when you email or contact CrowdSpot by telephone, mail or other electronic means;
- (c) when you engage with CrowdSpot via social media;
- (d) when you elect to receive CrowdSpot related newsletters or other information via our website;

- (e) when you engage with a project that is being conducted by, or on behalf of, CrowdSpot as part of the CrowdSpot Services;
 - (f) when you engage with CrowdSpot at a physical or digital promotional display;
 - (g) when you provide CrowdSpot with information in a survey, feedback form or complaint,
- (collectively, **the Collection Channels**).

What personal information does CrowdSpot collect?

CrowdSpot collects the following types of personal information required to assist with providing CrowdSpot Services:

- (a) 'contact information', such as your name, phone numbers, address details, email address and social media details (Facebook name, or Instagram or Twitter handle, for example);
- (b) your date of birth, age, gender;
- (c) details of your cultural background, nationality, and language(s) spoken, if you elect to provide that information to us;
- (d) copies of communications between CrowdSpot and you;
- (e) any views or opinions of yours related to the CrowdSpot Services that you elect to provide to us;
- (f) other personal information provided voluntarily by you. For example, this could be information provided by you in response to CrowdSpot surveys; and/or
- (g) non-personally identifiable information, such as your browser user token, browser type, web pages visited (that may, if combined with other information, be personal information).

Can you remain anonymous or withhold personal information?

Yes. Where practical, you may choose not to identify yourself, deal with us on an anonymous basis or use a pseudonym.

Please be aware that whilst you have control of the personal information you choose to provide to us, if you decide not to give us some of, or all, of the personal information that we request, this may affect, by way of example:

- (a) our ability to communicate effectively with you;
- (b) our ability to update you about the CrowdSpot Services; and/or
- (c) your ability to participate in future CrowdSpot Services.

How does CrowdSpot use your personal information? To whom will it be disclosed?

CrowdSpot may use your personal information for the primary purpose for which it was collected, i.e. the purpose specified in a privacy collection statement or the purpose that could be reasonably expected at the time the information was collected.

CrowdSpot will only ever use and disclose your personal information for the primary purpose for which it was provided by you (i.e. the purpose specified in a privacy collection statement or the purpose that could be reasonably expected at the time the information was collected),

for secondary purposes related to the primary purpose, and as otherwise permitted by Australian privacy laws.

So that you are kept aware of the ways in which we use your personal information, such primary and secondary purposes may include, by way of examples:

- (a) To perform the CrowdSpot Services that you have chosen to participate in;
- (b) To provide you with information about the CrowdSpot Services that you have chosen to participate in;
- (c) To provide you with information about other CrowdSpot Services that you may be interested in;
- (d) To complete an activity that you have chosen to undertake with CrowdSpot;
- (e) To administer CrowdSpot's relationship with you;
- (f) To monitor online activity on the CrowdSpot website(s) and/or application(s);
- (g) To market, improve and add to the CrowdSpot Services (including online); or
- (h) To disclose to authorities where required or authorised by law.

CrowdSpot may disclose personal information to other entities with whom it contracts. By way of example, CrowdSpot may provide personal information:

- (a) To third parties with whom CrowdSpot contracts to provide its services; and
- (b) To third parties authorised by you to receive personal information held by us.

Please be aware that we have contractual relationships with third party clients, project partners, suppliers, service providers and IT System administrators who partner with us, work with us and assist us in relation to the CrowdSpot Services. For example, IT vendors who develop, test and maintain IT systems and websites and project partners and clients who engage us to perform the CrowdSpot Services. Whilst highly unlikely, at times these third-party clients, project partners, suppliers, service providers and IT System administrators may be located outside Australia. We will inform you if and when this is the case. These third parties will be required to protect your personal information on the terms set out in their contract with us, including appropriate confidentiality provisions and compliance with Australian privacy laws as applicable.

Generally speaking, with respect to clients and project partners, CrowdSpot will de-identify any personal information that is going to be provided to one or more third parties as part of a particular project which forms part of the CrowdSpot Services. However, there may be instances where such personal information will be disclosed to such third parties. By providing your personal information to us, you consent to CrowdSpot using and disclosing that personal information to such third parties.

Will you receive direct marketing?

If you provide us with your personal information, you authorise us to send you promotional messages and materials related to CrowdSpot's products and services, unless you submit a later request not to receive direct marketing communications. You will not receive direct marketing in relation to third party products and services.

CrowdSpot's direct marketing messages and materials will contain a prominent statement (including, for electronic messages, a functional unsubscribe facility) that you may request not to receive direct marketing communications.

If you do not wish to receive marketing or other communications from us, please do not provide us with your personal information or use the unsubscribe facility provided in the most recent communication from us or contact us via the details provided in this Privacy Policy or the most recent communication.

Does CrowdSpot use “cookies”?

Yes. When you use CrowdSpot's website(s), CrowdSpot or its IT service providers may obtain information using technologies such as cookies, tags, web beacons, and navigational data collection (log files, server logs, and clickstream data). For example, CrowdSpot or its IT service providers may collect information like the date, time and duration of visits and which webpages are accessed.

This information is generally not linked to your identity, except where it is accessed via links in CrowdSpot e-message or where you have identified yourself.

What security measures does CrowdSpot use to protect my personal information?

CrowdSpot aims to keep your personal information secure. Any personal information that is collected via one of the Collection Channels which is held on an IT System is protected by appropriate technical and organisational measures, which may include firewalls, strong data encryption, intrusion detection, two factor authentication and prevention systems and the separation of data.

To give you further comfort that we value the protection of your personal information, we implement further appropriate technical and organisational measures for your benefit, for example;

- (a) limiting user access to our IT systems only to those we believe are entitled to be there, or on a “need to know” basis; and
- (b) proactive monitoring of our IT systems.

However, no server is guaranteed to be 100% secure and unauthorised access may occur, despite us taking all reasonable steps.

How long will we keep your personal information?

We will keep your personal information for the purposes set out in this Privacy Policy and in accordance with applicable laws. We will not retain your personal information for longer than is necessary. Further, if we find that we no longer need your personal information, we will remove it from our IT systems and destroy all record of it.

How can you access and correct your personal information?

You generally have the right to access your personal information free of charge, subject to some limitations contained in the *Privacy Act 1988*.

The APPs set out some circumstances in which CrowdSpot is not required to provide you with such access. If you ask for your personal information and any of these circumstances apply, you may not be given access to the personal information or you may be given access to the personal information in a way that is permitted under the *Privacy Act 1988*.

To protect personal information held by CrowdSpot, you may need to confirm your identity before access to your personal information is granted. It may take a little time to process your application for access and retrieve information from storage (if applicable). Usually, we will respond to you within 30 days.

CrowdSpot encourages you to provide updates in relation to your personal information so that CrowdSpot has accurate, current and complete information. You may correct any errors or request that CrowdSpot deletes all or some of your personal information. You may also opt out of any further contact from us.

How can you complain about privacy breaches?

If you have a complaint in relation to the collection, use or and disclosure of your personal information, please contact the CrowdSpot Privacy Officer via the details provided below. The CrowdSpot Privacy Officer will review all complaints received and respond to each complainant upon due consideration (which may require further information to be provided).

Will this Privacy Policy change?

CrowdSpot may amend this Privacy Policy from time to time. Amendments will be effective immediately upon notification on this website.

Who can you contact about your personal information?

If you would like to contact CrowdSpot about:

- (a) updating or correcting your personal information,
- (b) updating your privacy consents,
- (c) advising us of any privacy concerns,
- (d) making a privacy complaint,

please email the Privacy Officer at info@crowdspot.com.au. Alternatively, write to:

Anthony Aisenberg
Director, CrowdSpot
PO Box 465
Flinders Lane VIC 8009