## **PRIVACY NOTICE**

**Last modified: December 25, 2024**, to update our Privacy Notice for use by SRDITA.

This Privacy Notice describes how SRDITA and our subsidiaries (collectively "we," "us," "our," or "SRDITA") protect personal information of our customers, job applicants and visitors who use our websites, mobile applications, online products or services (collectively, our "users"). This Privacy Notice describes how your personal information is collected, disclosed and used by us, as well as an explanation of the related data rights you may have. To learn more about the SRDITA corporate family covered by this Privacy Notice, visit: <u>https://SRDITA.edu.au</u>. This Privacy Notice applies to all SRDITA websites, emails, job application services, platforms, brands, products, services and mobile applications (collectively, the "Services").

This Privacy Notice does not apply to the personal data collected or disclosed by users who manage the data of others while using our Services.

## CATEGORIES OF INFORMATION WE COLLECT ABOUT YOU

In the course of your use of the Services, we obtain information about you as described below.

## INFORMATION YOU VOLUNTARILY PROVIDE TO US

We collect the following information from you when you provide it to us:

- Information that you provide prior and during any registration process, including in connection with a co-branded offer (such as your name, company name, email address, phone number, billing address or credit card information, geographic location and industry).
- Information you provide as a job candidate as you complete the job application process (such as your resume or CV, and transcript or certifications).
- Information you provide when you call us, email us, or contact us in chat for support or otherwise.

- Information you provide when you use our Services such as through email, phone calls, chats or screen sharing services.
- Payment information, including credit card data and billing address when you purchase some of our Services.

## INFORMATION WE COLLECT ABOUT YOUR USAGE AND DEVICES

We collect data relating to your online activity on our websites, including the following:

- Your IP address, browser type and version, geographic location and operating system version. Any device or other method of communication you use to interact with our Services including device identifiers.
- How you got to our Services and any links you click on to leave.
- Pages you view including your interactions with any videos we offer.
- When you update your information, communicate with us or order new Services.
- Metadata about your use of our Services and emails we send to you (including clicks and opens).
- Metadata about how your customers, contacts and users interact with the Services we provide you.
- Issues you encounter requiring our support or assistance.

We store the data we collect in a variety of places within our infrastructure, including system log files, back-end databases and analytics systems.

### **INFORMATION WE ACQUIRE FROM SOCIAL MEDIA**

- We collect information (such as your name, social media account name and email address to pre-populate our sign-up form) from third party social networking sites, when you use your social network credentials to log into some of our Service.
- You can control the level of privacy settings you have in place at the social networking site. Find out more at the social networking site you use.

# INFORMATION WE ACQUIRE FROM OTHER SOURCES

We also collect the following information from other sources:

- Information you provide to us at seminars or to our partners.
- Information you provide to us in surveys.
- Information that is publicly available.
- Information from third parties with your consent.

We may collect and store demographic information (such as your zip code, date of birth, and/or age), and use this data to tailor your experience on our websites, ensure you are at least 18 years of age to make purchases, provide content that we think you might be interested in, perform general improvements to the websites, and display the content according to your preferences. Such demographic information may be provided to partners, market researchers and other third parties on an aggregate and non-personally identifiable basis. No personally identifiable information will be linked to such aggregated demographic information that is provided to third parties.

We also collect information that you may provide during your telephone conversations with us, which we may monitor or record.

We may combine any information we collect about you with other information we have about you to help us update, expand and analyse our records, identify new customers, and provide products and services that may be of interest to you. If you provide us personal information about others, or if others give us your information, we will only use that information for the specific reason for which it was provided to us.

#### HOW WE USE YOUR INFORMATION

We use the information we collect, both on its own and combined with any other information we collect about you, for the following business and commercial purposes:

- To provide the requested Services to you.
- To provide you with useful content.
- To ensure the proper functioning of our Services.
- To offer and improve our Services.
- To provide you with requested information or technical support.
- To evaluate your qualifications as a job applicant.
- To facilitate your movement through our websites or your use of our Services.
- To do a better job of advertising and marketing our Services (subject to your consent where required by applicable law).
- To advertise and market third party products and services (subject to your consent where required by applicable law).

- In connection with our security and compliance programs.
- To administer our websites.
- To communicate with you.
- To create directories (only when you explicitly ask to be included).
- To bill for Services.
- To target current or prospective customers with our products or Services through online advertisements served on third-party sites by third-party vendors, such as Google (subject to your consent where required by applicable law).
- To assist us in offering you a personalized experience or otherwise tailor our Services to you.
- As otherwise described in this Privacy Notice.

We also use the information we receive to produce reports on trends and statistics, such as mobile search trends, email open rates by industry, campaign best practices or the number of users that have been exposed to, or clicked on, our websites or evaluated or purchased our products or Services.

Payment information that you provide to us, including credit card data, will only be used to facilitate payment for the Services.

We also use recorded telephone conversations for quality control purposes, to train our employees and for our own protection.

### **COMMUNICATING WITH PARTNERS**

We provide your personal information to certain third-party partners, including marketing and advertising partners. That information includes your name, email address and other information enabling partners to:

- Assist you in using our Services.
- Contact you with offers, services or products that may be of interest to you.
- Provide you with their products or services.

Our partners may use cookies, web beacons, pixels, tags, scripts, device recognition and similar technologies in order to provide you advertising based upon your browsing activities and interests. For more information and guidance on how to opt out of cookies <u>click here</u> to access our Cookie Notice.

If you are located in a jurisdiction where such disclosing requires your consent, we will only do so with your consent. Please note that if you access our Services through a tool that hides your location, such as through a virtual private network, you may not receive our request for permission because we were not able to identify you as being located in a jurisdiction where your permission is required.

Further, our partners are prohibited from using your contact information for any purpose beyond those set forth above without your consent. We will not provide our partners with your credit card information. Further information about certain partners we communicate personal information is available <u>here</u>.

In the event we collect information from you in connection with an offer that is jointly presented by us and a partner, we will let you know who is collecting the information and whose Privacy Notice applies, as well as any options you may have regarding use of your information.

### COMMUNICATING WITH THIRD PARTY SERVICE PROVIDERS AND VENDORS

Occasionally, we enter into contracts with carefully selected third parties to assist us in servicing you (for example, providing you with customer service, fraud detection and deterrence, job recruitment or access to advertising assets and providing us with information technology and storage services) or to assist us in our own marketing and advertising activities (including providing us with analytic information and search engine optimization services). We disclose information to certain third-party service providers listed <u>here</u>. Our contracts with such third parties prohibit them from using any of your personal information for any purpose beyond the purpose for which it was disclosed.

If you purchase a product or service from a third party through one of our brands, we will pass your personal information to such third party in order for them to fulfill your order.

By providing your personal information and other confidential information to artificial intelligence (AI) services which include features provided by third parties, you are disclosing your personal information to obtain the AI services.

We offer features that allow you to better target who you contact through our Services. These features allow you to optimize your campaigns, segment your lists, and better customize your offerings to your customers. In order to do this, we partner with third parties who can provide you with information about your contacts. If both you and your contacts are located outside of the United Kingdom and the European Union, this may include demographic information and geographic location. We require that these third parties are contractually or legally permitted to receive this information.

In order to provide you with these features, we may send third parties certain pseudonymized personal data about your contacts. These third parties are prohibited from using this personal data for any purpose beyond that for which it was disclosed.

We also use non-personal information with certain third parties, including the media, industry observers, marketing and advertising partners, vendors, customers, potential customers or partners. For example, we disclose mobile search trends, email open rates by industry, campaign best practices or the number of users that have been exposed to, or clicked on, our websites or evaluated or purchased our Services.

Our third party service providers and vendors may use cookies, web beacons, pixels, tags, scripts and similar technologies in order to provide you advertising for our services based upon your browsing activities and interests on our websites. <u>Click here</u> to access our Cookie Notice for more information and guidance on opting out of cookies.

For Directory Listings. If you provide your information in order to be included in our free directories you are consenting to (1) individuals contacting you to solicit your products and services and (2) businesses contacting you to market services you may find useful. Due to the nature of a directory, your information will be published publicly and you may be contacted by phone or email depending on the information you provide. You will never be added to our directories unless you request to be included and you may remove your listing at any time by accessing your Scoot dashboard, calling + 61 721421776 or emailing us at <u>customersupport@srdita.edu.au</u>.

For Promotional Offers and Sweepstakes. When you provide your name for a promotional offer or to enter a sweepstakes or contest, your participation in the contest constitutes the consent for the for the use of your name, likeness, prize, photograph, voice, opinions and/or hometown and state for promotional purposes and to demonstrate the transparency of a competition, in any media, worldwide, without further payment or consideration. We may request the contest winner provide consent to such use in writing. We will file your name with state agencies if required by law.

#### COMMUNICATING WITH RESELLERS AND PRIVATE LABEL PARTNERS

As it relates to SRDITA's trusted resellers and private label partners (collectively, "Resellers"), SRDITA may process customer Personal Data on behalf of Reseller. In such cases, Reseller is the data controller and SRDITA is the data processor and each party's obligations will be outlined in the Reseller Agreement between the parties. In the event of a data subject access request sent by a third party to a Reseller, Reseller will make a similar request to SRDITA by visiting our DSAR portal here, and submitting the appropriate form. All data collected through this relationship will be treated in accordance with this Privacy Notice.

## **CORPORATE REORGANIZATIONS**

If we are involved in a merger, acquisition, a sale of all or a substantial portion of our assets, or other similar sale transaction, your information will be transferred as part of that transaction. We will notify you by email and/or a prominent notice on our website of any such transfer and any choices you may have regarding your information.

## AUTHORIZED USERS

All users authorized by you to have access to your account can view personal information stored in the account. A primary account holder can view personal information saved in subaccounts to which they have authorized access. We use information about authorized users only for legitimate purposes consistent with this Privacy Notice, including servicing your account and marketing products and services to you.

## LEGAL PROCESS

If legally required to do so, or if we have a good faith belief that such disclosure is reasonably necessary, we may disclose your personal information to courts of law, public authorities (including to meet national security or law enforcement requirements) and other relevant third parties, such as internet service providers, to conduct an investigation, respond to a third party or law enforcement subpoena or court order, to bring legal action, prevent harm to others or pursue other relief when you or a third party are or may be:

- Violating our terms and conditions of use.
- Causing injury or other harm to, or otherwise violating the property or other legal rights, of us, other users, or third parties.
- Violating federal, state, local, or other applicable law.

## SECURITY

The transmission of information via the internet, email or text message is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your information transmitted through websites or over email; any transmission is at your own risk. Once we have received your information, we will take appropriate technical and organizational measures to safeguard your personal information against loss, theft and unauthorized use, access or modification.

## TRACKING TECHNOLOGIES AND ONLINE ADVERTISING

We use cookies, web beacons, pixels, tags, scripts and other similar technologies in the course of our business. Information about the technologies we use, why we use them (for example, in connection with online advertising) and how you can control them can be found in our Cookie Notice found <u>here</u>.

## CHOICE/OPT-OUT

## MARKETING COMMUNICATIONS FROM US

We will need to contact you directly or through a third party service provider as necessary to deliver transactional or service related communications regarding products or Services you have signed up or purchased from us. We will also contact you with offers for additional services if you have given us consent to do so or we are allowed based on legitimate interests. You do not need to provide consent to receipt of marketing communications in order to receive our Services.

## EMAIL

You always have the opportunity to opt out of our marketing communications or change your preferences by following the link in the footer of all non-transactional email messages from us or by emailing us at privacy@SRDITA.edu.au.

Some communications from us are considered transactional or service communications (for example, important account notifications and billing information). You agree to receive these transactional and service communications as a condition of the Services that we provide to you. You must cancel your accounts for all Services, if you do not wish to receive any transactional or service communications from us. To cancel your account, please follow the instructions found in the terms of service for the applicable Service. You may still receive marketing communications from us even after you cancel your account unless you also opt out of our marketing communications as described above.

## PHONE, TEXT (SMS) MESSAGES AND POSTAL MARKETING

If you have given your consent to send you email, phone or text (SMS) marketing, or if you have provided us with your postal address, we will use the personal data you give to us to contact you from time to time. If you register on our site, you can choose to provide your consent to receive marketing communications by e-mail, phone and/or cell number (including use of automated dialing equipment and/or pre-recorded calls), text (SMS) message, social networks or any other means of communication that your device may be capable of receiving. If you do not want to receive postal or electronic communications, you may withdraw your consent at any time, by clicking the link in a communication, or emailing us using the address provided below. You don't need to provide consent as a condition to purchase our products or services. If you want to withdraw your consent to receive marketing calls by phone, you may contact customer support at the brand from which you purchased your Services and indicate your preference to us. Contact information for specific brands can be found on the homepage of each brand

### COOKIES

For information about how to manage and opt out from cookies, please visit our <u>Cookie Notice</u>.

### **INFORMATION FROM THIRD PARTIES**

To manage the information we receive about you from a social networking site or other third party (if applicable), you will need to follow the instructions from that party for updating your information and changing your privacy settings, where available. The information we collect is covered by this Privacy Notice and the information a third party collects is subject to the privacy practices and notice of that third party. Privacy choices you have made on any third party site will not apply to our use of the information we have collected directly through our Services.

## UNAUTHORIZED ACCOUNTS

If an account or profile was created without your knowledge or authorization, please contact customer support at the brand on which the account or profile is located to request removal of the account or profile.

### **RETENTION OF PERSONAL INFORMATION**

We retain your personal information to provide Services to you and as otherwise necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. We will retain your personal information for no more than seven years following the later of (i) the date on which you terminate your use of the Services or (ii) May 25, 2018, unless we are otherwise required by law or regulation to retain your personal information for longer. For example, where you have a contract with us, we will retain your data for the length of the contract, and will further retain that information for a time period consistent with our legal or regulatory responsibilities after the termination or expiration of your Services with us in order to allow us to resolve disputes, enforce our relevant Service Agreement, and to adhere to the technical and legal requirements and constraints related to the security, integrity and operation of the websites. Job candidate information will be retained for as long as there is a business need or as required by law or regulation. If you have any questions about how long we will keep your specific data, please contact privacy@SRDITA.edu.au.

## YOUR RIGHT TO CONTROL HOW YOUR PERSONAL INFORMATION IS USED

You have the right to make requests regarding your personal information. You can:

- Ask us to access or provide information on how we use, update, remove, restrict, or correct your personal information.
- Ask us to identify what personal information of yours has been disclosed.
- In certain circumstances, receive or (if technically feasible) ask us to provide your personal information to a third party, in a structured, commonly used and machine-readable format, although we will not provide you with certain personal information if to do so would interfere with another's individual rights or where another exemption applies.
- Object to marketing at any time by privacy@SRDITA.edu.au

• Withdraw your consent to process your personal information in circumstances where we are relying on your consent as our basis for processing.

You can view or change the personal information you have provided us by submitting a request through our DSAR portal <u>here</u> or logging into your online account manager, if applicable. To exercise any of your rights, please send an email to <u>privacy@SRDITA.edu.au</u> or visit our <u>Privacy Centre</u>.

Please note that some rights only apply in certain circumstances or to certain information and some exceptions may apply. In some areas you have data subject rights afforded by the laws in that jurisdiction, to find out if the rights apply to you and exercise your rights, go to the DSAR portal <u>here</u>.

## THIRD PARTY LINKS AND INFORMATION COLLECTION AND USE BY OUR USERS

Some of our Services provide links to other websites. Because we do not control the information policies or practices of these third party sites, you should review their privacy policies to learn about how they collect and use personal information and direct any concerns to the site administrator of that website.

SRDITA Digital uses Google's YouTube API Services. By using YouTube's API Services, you agree to YouTube's <u>Terms of Service</u> and <u>Privacy Policy</u>.

You may also log in to some of our Services using sign-in services such as Facebook Connect or an Open ID provider. These services will authenticate your identity and provide you with the option to disclose certain personal information to us, such as your name and email address to pre-populate our sign up form. For example, if you take advantage of certain of our social media features, such as the Facebook Like button, and widgets, such as the "Share This" button or interactive mini-programs that run on our site, the applicable social networking sites may collect your IP address, which page you are visiting on our websites, and may set a cookie to enable it to function properly.

### CHILDREN

Our Services are not directed to persons under 18. We do not knowingly collect personal information from children under 18. If you are a parent or guardian of such a child and become aware that your child has provided personal information to us, please contact us as described in this Privacy Notice and we will take reasonable steps immediately to remove any such information.

## **NOTIFICATION OF CHANGES**

We reserve the right to modify this Privacy Notice at any time, so please review it frequently. If we decide to change this Privacy Notice in any material way, we will notify you here, by email, or by means of a notice on https://SRDITA.edu.au or the website of the SRDITA product or service you use prior to the change becoming effective. In all cases, your continued use of any Services constitutes acceptance to any such changes.

#### **CONTACT US AND COMPLAINTS**

If you have any questions about this Privacy Notice or our data handling practices, or you wish to make a complaint, you may contact our Data Protection Officer at privacy@SRDITA.edu.au or by regular mail at:

SRDITA 8/11 Logandowns Drive Meadowbrook, QLD 4131 Australia. Attn: Data Protection Officer