

STRAWBERRY SEED CONSULTING PRIVACY POLICY

Our Commitment

Indy & Co Pty Ltd t/a Seed Consulting (ABN47 626 983 819) (“Strawberry Seed”) and its related entities are committed to maintaining the privacy and confidentiality of our consumers’ personal information (“You” or “Users”).

Your Personal Information

Personal information may be information recorded or otherwise stored about an identified or reasonably identifiable to an individual.

Strawberry Seed respect the importance of your privacy and acknowledge that when you provide your personal information, you do so, on the provision that unless you directly give Strawberry Seed permission, consent, or otherwise, Strawberry Seed will only collect and use your personal information in accordance with this Privacy Policy. By downloading or using our website, you acknowledge that you have read and accept the terms of our Privacy Policy.

Through the provision of our services we may collect or be provided with sensitive information. For the purposes of this Policy, Sensitive Information shall include but not be limited to Personal Information in respect of disability, religious beliefs, racial or ethnic origin, political beliefs or genetic information.

Collection

Strawberry Seed collects personal information about individuals, including our clients, persons associated or employed by our clients, or our business contacts, only where necessary to provide one or more of our Services and to effectively manage our Site.

The types of personal information Strawberry Seed collects may be your contact details, date of birth, payment and billing details (including credit card details where relevant), email address and any personal information held by your employer.

Strawberry Seed may also collect and use Personal Information for secondary purposes including our marketing, events or research purposes. Strawberry Seed will not use your information for any other purpose without your consent.

Strawberry Seed generally collects Personal Information when you:

- Provide us with your personal information and contact details;
- Visit and browse our website;
- Engage our Services;
- Complete an enquiry form;
- Subscribe to Strawberry Seed’s newsletter service or promotions;
- Interact with Strawberry Seed electronically, via social media (including Facebook and Twitter, email or our website);
- Or via telephone;
- When you attend a training session conducted by us; or

- From your employer.

Strawberry Seed will not collect Sensitive Information about you except with your consent or only where it is reasonably necessary to collect such information or required by law.

Strawberry Seed may also collect personal information from a third party (other than your employer) where:

- You have consented to the collection of the information;
- We are required or authorised under Australian law, court/ tribunal, or someone other than you;
- It is unreasonable or impracticable to obtain the information from you; or
- Where the information is publicly available.

Use and Disclosure

We first and foremost use personal information to provide our services.

Strawberry Seed generally only uses and discloses your Personal Information to:

- Communicate with you or other users;
- provide our specified Services;
- monitor Site performance and maintenance;
- Assist with any enquiries;
- Provide you with information in relation to our events or offers;
- Share information about business-related developments and information of relevance or interest;
- Provide you with stories or publications; or
- Overseas recipients for the provision of the Services.

We may also share information internally or to Related Bodies Corporate (as defined in the Corporations Act 2001 (Cth)) within Strawberry Seed and its related entities, in order to communicate information about our wide range of Services or latest business solutions.

We store personal information in cloud-based software which is hosted in New Zealand and in the United States. This means we are disclosing your personal information to entities outside of Australia. If you do not agree with our using your personal information in this way, please let us know, however it may mean that we are unable to provide our services to you.

Generally, Strawberry Seed will obtain your consent in writing or implied, prior to disclosing your Personal Information to a related or unrelated third party. However, in some circumstances we may use and disclose your Personal Information and Sensitive Information without obtaining your consent where permitted by law.

Strawberry Seed are also likely to provide links on their website to direct you to third parties. When you leave our website, Strawberry Seed is no longer

responsible for your personal information and you should read the privacy policies of the third-party sites. We do not sell or trade information to any third party.

Marketing

Strawberry Seed may use your Personal Information to send you direct marketing. When you receive our marketing, Strawberry Seed will always provide you with an option to opt out of receiving future direct marketing. If you do not elect to opt out of receipt of future marketing, Strawberry Seed may provide you with further marketing materials unless you select to opt out.

Please be aware that some of Strawberry Seed's off-shore service providers may also send you direct marketing where you have provided Personal Information via a link on our website.

If you require further information in relation to opting out of our Marketing, please contact Strawberry Seed's Privacy Policy Officer.

Data quality & Security of your Personal Information

Protecting your Personal Information is a priority at Strawberry Seed. We may hold your Personal Information in electronic and physical files or on secure servers and archiving and take reasonable steps to ensure that your Personal Information is protected.

It is important to us that the information we maintain, and use is accurate, complete and up to date. If at any time your Personal Information changes, please let us know immediately so that we may update our records. Strawberry Seed may also make copies of any information held.

The information we hold about you is treated confidentially and is only accessed when necessary. Whilst we take caution to protect your personal information and data, no data transmission over the internet or electronically can be completely secure. Once we have received your information, Strawberry Seed takes all appropriate measures to use procedures and security programs to ensure its security on our systems. We take reasonable steps to protect the information we retain from misuse, loss and from unauthorised access, modification or disclosure.

Strawberry Seed may also provide links to external websites and content referenced to third parties on our website. We do not make any representations as to the quality of these external links, the content they provide or the privacy policies applicable to any external website access via a link on our website. We will not be liable for any loss, corruption, delay or loss of confidentiality arising from any data or information transmitted electronically if we have followed appropriate virus checking and privacy procedures.

You may also assist us to keep your personal information secure by ensuring appropriate back-ups, security and virus check procedures are in place for any data or information provided to or received from Strawberry Seed electronically. Please use your discretion and exercise caution when providing your personal information.

We will not retain any of your information for any longer than it is required by us, except to the extent permitted by law to satisfy legal requirements. Strawberry Seed may also de-identify your information where applicable.

Accessing, Correcting and Deleting your Personal Information

You may request access to your personal information that we hold about you at any time. However, this right of access is subject to some exceptions permitted by law. To make a request, please put your request in writing to the Privacy Officer using the contact details below.

In normal circumstances we will give you full access to the personal information held about you as soon as practicable. However, in some circumstances we may require proof of identity or deny your request if it would be unreasonable to provide you with access or would impact on the privacy of another person.

You can request that information about you be corrected or deleted. If you request that your personal information be deleted, Strawberry Seed shall take all reasonable steps to delete it unless it is needed for legal reasons. Personal information may also be retained in certain files in order to resolve disputes or for auditing purposes. However, some personal information may also be retained in our technical systems in accordance with our data security procedures.

Cookies

Strawberry Seed may use cookies and other similar technologies which often include an anonymous unique identifier. A “cookie” is technology that allows our web site to store information in your browser used only by our site while you are on our site. Cookies allow us to store your electronic information, including your internet protocol address (IP), browser type and time you accessed our website. They serve to help us track web traffic and users’ preferred locations and languages. Each web site can send its own cookies to your browser if your computer software allows it. We may receive information from you via our cookies.

If you prefer not to receive cookies, you may alter your web browser configurations to decline cookies and therefore deliver no information. If you require further information in relation to cookies please contact us on the details below.

Anonymity

You may deal with us anonymously where it is lawful, practicable and reasonable to do so.

Changes to this Policy

Strawberry Seed may review and change this policy statement as needed. If changes are made, please note that the new privacy procedures will be implemented within a reasonable period of time. The amended Privacy Policy will be published on our web site and will apply whether or not Strawberry Seed has

given you specific notice of any change. Check the Privacy Policy periodically if you would like to monitor any changes.

Complaints

If you believe there has been a breach of your Privacy, you may make a complaint by advising us in writing, using the contact details below. We will respond to your complaint within a reasonable period of time.

If the complaint cannot be resolved, you may refer your complaint to the Office of the Australian Information Commissioner ("OAIC").

Governing Law

This Policy and use of our web site are governed by the laws of Australia. If a dispute arises under this Policy we agree to attempt to resolve the dispute under those laws.

Contact Details

The Privacy Officer

41 Onshore Drive

Torquay, Victoria 3220

E-mail: carli@strawberryseed.com.au

If you require a copy of our Privacy Policy in another form, please contact us.

Updated: June 2019