

Success Resources Australia Privacy Policy

Success Resources Australia Pty Ltd ('Success Resources Australia') respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

1. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how Success Resources Australia collects and processes your personal data, including any data you may provide when you sign up to our online programs, newsletter, purchase tickets for an event, a product or service or take part in a competition.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

Success Resources Australia Pty Ltd is the controller and responsible for your personal data (collectively referred to as "Success Resources", "we", "us" or "our" in this privacy policy).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways:

Email address: sonal+DPO@srglobal.com

You have the right to make a complaint at any time to the Office of the Australian Information Commissioner (OAIC), the Australian supervisory authority for data protection issues (www.oaic.gov.au). We would, however, appreciate the chance to deal with your concerns before you approach the OAIC so please contact us in the first instance.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, marital status, title, date of birth and gender. We may also collect the name and contact details of individual consumers receiving the benefit of our services.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers. We may also collect details of phone numbers used to call our organisation and the date, time and duration of any calls.
- **Employee Data** if you work for one of our customers, the information we collect about you may include your contact information, details of your employment and our relationship with you.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Visitor Data** includes information about your access to portals for online programs and/or attendance at one of our events, This includes but is not limited to the date and time, modules accessed, calls participated in, who you are visiting, the type of event and images or sounds of you attending our events or enjoying our services and products. We may make videos, take photographs or make audio recordings of our events, services and products which may include you.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Visitor Data to calculate the percentage of visitors accessing a program. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any information about criminal convictions and offences.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us Identity, Contact and Financial Data by filling in forms or by corresponding with us directly in person (for example at an event) or by post, phone, email or otherwise. This includes personal data you provide when you:

- purchase or access one of our online programs
 - attend one of our events;
 - apply for our products or services;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey;
 - give us feedback or contact us; or
 - your organisation makes a complaint or there is a dispute with you or your organisation
- **Visitor Data.** When you access our online programs or attend one of our events, we will automatically collect Visitor Data as detailed above.
- **Employee Data** from your organisation who should have informed you that your information would be provided to us, and provided you with a copy of this policy.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
- **Contact, Financial and Transaction Data** from our business partners and subcontractors providing technical, payment and delivery services and credit information on you from third party reference agencies.
 - **Identity, Contact Data and Employee Data** from publicly available sources such as the Australian Business Register, Electoral Rolls, your employer website or LinkedIn.
 - **Identity and Contact Data** from a third party (such as our sub-contractors, event trainers and speakers or internally from one of the Success Resources Group companies) for the purposes of sending you information about our relevant products and services which you might be interested in. If a third party collected your name and contact details, we will give you a fair processing notice and respect any communication preferences you give us.
 - **Identity and Contact Data** from one of our group companies. In this case the relevant group company will have informed you when we collected the data if we intend to share the data internally.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) (c) If you are an employee of the organisation that entered a contract with us as necessary for our legitimate interests (in managing our relationship with your organisation)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to take part in a prize draw, competition or complete a survey	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant advertisements to you and measure or understand the effectiveness of the advertising we serve to you	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To create videos, take photographs or make audio recordings of our events, services and products which may include your image or voice	Necessary for our legitimate interests (to develop our products/services and grow our business). You consent to being included in those videos, photographs and audio recordings

To make suggestions and recommendations to you about goods or services that may be of interest to you	Necessary for our legitimate interests (to develop our products/services and grow our business)
Collecting and using Visitor Data	Necessary for our legitimate interests in administering your visit, ensuring site security and visitor safety.

The use of cookies technology

A 'cookie' is a packet of information placed on a user's computer by a website for record keeping purposes. Cookies are generally used on our websites including our event specific websites for the following purposes:

- Monitoring website traffic - we use tracking companies and software to gather information about how people are using our website, this information includes time of visit, pages visited, and some system information about the type of computer you are using. We use this information to enhance the content and services offered on our website.
- Manage advertising - we use advertising companies to deliver parts of our online advertising. When you see one of our ads on a third-party website, cookies are sometimes used to collect information about what pages you visit and the type of software you are using.
- Cookies may also be used for other purposes on our website but in each case none of the information collected can be used to personally identify you.
- You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent.

Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.

- If you disable the use of cookies on your web browser or remove or reject specific cookies from our website or linked sites then you may not be able to gain access to all of the content and facilities in those websites.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Transaction and Visitor Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any external third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by logging into your account on our website to adjust your marketing preferences or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table above.

- Internal Third Parties which are other companies in the Success Resources Group acting as joint controllers or processors and who are based worldwide for the purposes of sharing CRM and finance systems, as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, and for system maintenance support and hosting of data and to provide you with information about products and services we think you might be interested in unless you have opted out of receiving such marketing messages.
- External Third Parties such as our contractors and designated agents so that they can carry out their services. The following activities are carried out by third-party service providers: administration, CRM system, digital marketing, email marketing system, event administration and management, event sponsors, event technology systems, event venues, feedback and review platforms, IT services, payment processing systems, trainers and speakers at events and training partners.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets.

Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

We share your personal data within the Success Resources Group. This will involve transferring your data outside Australia. For further information on our group of companies, please see www.srglobal.com Also, many of our external third parties are based outside Australia so their processing of your personal data will involve a transfer of data outside Australia. You consent to the collection, use, storage, and processing of your personal information in an overseas country.

Whenever we transfer your personal data out of Australia, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data in accordance with Australian Privacy Principles.
- Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of Australia.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for seven years after they cease being customers for tax purposes.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for

research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You have a right under the Privacy Act 1988 (Cth) (Privacy Act) to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

Fees

We may charge a reasonable fee to access your personal data (or to exercise any of the other rights). In ordinary circumstances we will give you full access to your personal information. However, there may be some legal or administrative reasons to deny access. If access is denied, we will provide you with the reason why.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.