

VIRTUAL SUCCESS ACADEMY

1. PRIVACY POLICY

Your privacy is important to us. We are committed to protecting the privacy, confidentiality and security of the personal data we hold by complying with the requirements under applicable laws and regulations. We are equally committed to ensuring that all our employees, service providers and agents uphold these obligations. This policy explains how we manage personal data within our group.

We may review and update this Privacy Policy from time to time to take account of new laws and technology. All personal information held by us will be governed by the most up-to-date version of this Privacy Policy posted on our website success-academy.com.au.

2. WHAT KINDS OF PERSONAL INFORMATION IS COLLECTED AND HELD?

Personal information collected and held by us may include the following:

- name, postal and email address
- date of birth
- contact details including telephone numbers (landline and mobile)
- gender
- occupation and employment details
- 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.

We will collect this information from you directly where it is reasonable and practicable to do so.

We may collect personal information directly from you when you:

- provide information to us in any way (including by completing a form, disclosing information over the phone, registering for an event or providing us with a business card)
- visit our website
- acquire goods from us or use our services (including via our website)
- request information about us, our products or our services
- provide feedback
- fill in a form on our website; or
- where we are required or authorised by law to do so

3. HOW IS YOUR PERSONAL INFORMATION USED?

We collect personal information primarily to record appropriate details for any service or order you have placed with us or any of our resellers or channel partners, and to enable us (or our resellers or channel partners, as the case may be), to:

- administer our customer relationship
- provide you with information, products or services you have requested

- inform you of new or updated offers, events, goods or services
- deliver goods, content or services you have purchased or licensed from us (or our resellers or channel partners, as the case may be), or to enable you to use our services (including via our website) or the services or website of our resellers or channel partners, as the case may be
- receive information you may request relating to our products or our services or the services or website of our resellers or channel partners, as the case may be
- receive your feedback or
- comply with any law or regulation.

You consent to us using your personal information in those ways and for sending you information about our products, services and special offers, as well as the products and services of our affiliates and third parties, now and in the future. You also consent to us sending you the information by direct mail, telemarketing, email, SMS and MMS messages and other forms of social marketing.

We may stream, or make available for online purchasing or viewing, videos, photographs or audio recordings of our events, services and products which may include your image or voice. You consent to being included in those videos, photographs and audio recordings.

4. OVERSEAS DATA TRANSFERS

Your personal information may be disclosed, transferred, stored, processed or used in countries other than your own either by us or by our third-party service providers. This may happen when you use our website, when we outsource certain activities overseas or if transactions, information, services or products have an overseas connection. You consent to the collection, use, storage, and processing of your personal information in another or overseas country.

5. ACCESSING YOUR PERSONAL INFORMATION

You have a right under Privacy legislation to request access and seek correction to your personal information. You may do so by contacting us using the contact details above. 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.

6. SECURITY OF YOUR PERSONAL INFORMATION

We are committed to maintaining the security and confidentiality of the data you provide us and we will take all reasonable precautions to protect your personal information with the aid of our stringent security procedures and the latest technology. Any personal information you provide to us will be collected and held by us or on our behalf. Access to and use of personal information within our group is appropriately limited to prevent misuse or unlawful disclosure of the information.

If other organisations provide support services, we require them to appropriately safeguard the privacy of the information provided to them.

Where the personal information we collect is no longer required, we delete the information or permanently de-identify it.

We will not otherwise disclose your personal information unless the disclosure:

- is in accordance with this Privacy Policy or any agreement you enter into with us
- is required by law
- is authorised by law; or
- is made with your consent.

7. PERSONAL INFORMATION QUALITY

We aim to ensure that your personal information is accurate, complete and up to date. To assist us in this, you need to provide true, accurate, current and complete information about yourself as requested, and properly update the information to us to keep it true, accurate, current and complete.

Please contact us at privacy.sgm@srglobal.com if you believe that the information is inaccurate or incomplete, and we will use all reasonable effort to correct the information.

If we do not believe the information to be incorrect, we will take reasonable steps to add a statement to the information to the effect that you believe the information is not accurate, complete or up-to-date.

8. 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 website success-academy.com.au 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.
- managing 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.

9. GOOGLE ANALYTICS

Our website uses Google Analytics, a web analytics service provided by Google, Inc. (Google). Google Analytics uses cookies to help the website analyse how users use our website.

The information generated by the cookie about your use of our website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of our website. By using our website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

10. RETENTION OF PERSONAL DATA

Your personal data will not be kept longer than required.

We may retain your personal data for a period of 5 years. At our discretion, we may retain personal data for longer than the said period if we consider it necessary or desirable to do so to meet our legal or regulatory obligations.

11. ACCESS AND CORRECTION

If you want to access any of the personal data that we hold about you or to correct some aspect of it (e.g. because you think it is incomplete or incorrect), please contact our privacy compliance team using the contact details set out below. To protect the integrity and security of the information we hold, we may ask that you follow a defined access procedure, which may include steps to verify your identity. In certain cases we may charge you an administration fee for providing you with access to the information you have asked for, but we will inform you of this before proceeding. There may be cases where we are unable to provide the information you request, such as where it would interfere with the privacy of others or result in a breach of confidentiality. In these cases we will let you know why we cannot comply with your request.

Even if you do not request access to and/or correct your personal data held by us, if we are satisfied that, having regard to the reasons for which we hold your personal data, that personal data is inaccurate, incomplete, out-of-date, irrelevant or misleading, we may take reasonable steps to correct that information.

12. YOUR CONSENT

By using our site, providing personal data and/or using any of our products or services, you agree that:

- you consent to this privacy policy, as updated from time to time; and
- if you have provided personal data to us relating to any other person, you:
 - have a right to provide that information;
 - have provided a copy of this privacy policy, as updated from time to time, to that person; and
 - each such person has agreed to those terms.

13. CHANGES TO THIS POLICY

We may make changes to this policy from time to time, to take into account changes to our standard practices and procedures or where necessary to comply with new laws and regulations. The latest version of this policy will always be available on our website.

14. ADDITIONAL POLICIES IN COMPLIANCE WITH THE EEA PRIVACY LAWS

In addition to the other policies described in this Privacy Policy, residents of the European Union or the EEA are afforded the following additional rights and protections as required by the General Data Privacy Regulation (GDPR). These additional rights and protections apply only to residents of the European Union or the EEA.

14.1 GDPR DEFINITIONS

The GDPR defines the words and phrases used in this section 14 as follows:

PERSONAL DATA means any information relating to a natural person.

PROCESSING is any operation or set of operations which is performed on personal data.

RESTRICTION OF PROCESSING is the marking of stored personal data with the aim of limiting their processing in the future.

PROFILING means any form of automated processing of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

CONTROLLER OR CONTROLLER RESPONSIBLE for the processing is person or body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

PROCESSOR is a person or other body which processes personal data on behalf of the controller.

14.2 COLLECTION OF GENERAL DATA AND INFORMATION

We collect your information in a number of different ways. These may include (but may not be limited to),: (1) from your browser (2) from your operating system , (3) from the website or link from which z you accessed our website (a referrer), (4) the date and time of access (5)

your IP address (6) your Internet service provider and (8) any other similar data and information that may be used in the case of an attack on our information technology systems.

When using this general data and information, we do not draw any conclusions about you. Rather, we need this information to (1) deliver the content of our website correctly, (2) optimize the content of our website and its promotion, (3) ensure the long-term viability of our information technology systems and website technology, and (4) if necessary, provide law enforcement authorities with information for criminal prosecution in the case of a cyber-attack. Data and information is analysed statistically and anonymously, with the aim of increasing the data protection and data security of our enterprise.

14.3 REGISTRATION ON OUR WEBSITE

You may sometimes be required to register on our website and disclose your personal data which will be collected for internal use and unless otherwise specified, for our own purposes only. We may be obliged to disclose some of your personal data to third parties from time to time (e.g. a courier service).

By registering on our website, your IP address and time of the registration are also stored. This is necessary to prevent the misuse of our services, and, if necessary, to make it possible to investigate committed offences. This data is not passed on to third parties unless there is a statutory obligation to do so or to assist with a criminal prosecution.

We will register your data to enable us to identify you for offers (and where necessary, deliver) of information and services intended only to registered users. You may change or remove all, or some of, your personal data at any time.

Upon request, we must provide you with information as to your personal data stored and in the absence of any statutory storage obligation, we must correct or erase your personal data as and when requested by you.

15. CONTACT POSSIBILITY VIA THE WEBSITE

You may contact us electronically either via a link contained in our website or by email privacy.sgm@srglobal.com. Any personal data transmitted by you will be automatically stored in our backend systems for the purpose of processing or making contact with you. We will not disclose any of your personal data to third parties unless required by law or in the defence of any legal process.

15.1 ROUTINE ERASURE AND BLOCKING OF PERSONAL DATA

We will process and store your personal data only for so long as it is necessary or otherwise legally permissible, whereafter it will be automatically erased.

15.2 YOUR RIGHTS

To the extent any of the rights in this section conflict with the rights generally of our privacy policy, the rights in this section will prevail to the extent of the inconsistency.

You have the following rights granted by the European legislators. If you wish to avail yourself of your rights, you may contact us at privacy.sgm@srglobal.com at any time:

- a) **RIGHT OF CONFIRMATION** – to require us to confirm to you whether or not your personal data is being processed.
- b) **RIGHT OF ACCESS** – to obtain from us information relating to which of your information is stored, its purpose and you are right to lodge complaints with relevant authorities including the manner in which do so.
- c) **RIGHT TO RECTIFICATION** – you have the right, at any time, to supplement amend or delete any incomplete or incorrect personal data.
- d) **RIGHT TO ERASURE (RIGHT TO BE FORGOTTEN)** – you may, at any time, direct us to remove personal data. We must do so immediately on receipt of such request if it is no longer necessary for us to obtain your personal data or if your request is made in terms of any of the following provisions of the GDPR:
 - Article 6(1)(a)
 - Article 9(2)(a)
 - Article 21(1 or Article 21(2).
 - Article 8(1).

Where we have made your personal data public and are obliged under Article 17(1) to erase your personal data, then, taking account of available technology and the cost of implementation, we must take reasonable steps, including technical measures, to inform other controllers processing you will personal data that you have requested erasure by such controllers of any links to, or copy or replication of, your personal data, as far as processing is not required. We will determine the necessary measures in individual cases.

- e) **RIGHT OF RESTRICTION OF PROCESSING** – you may restrict us processing your personal data in any of the following circumstances:
 - your personal data is not accurate.
 - processing is unlawful you prefer to have the dates restricted rather than erased.
 - we no longer need the personal data for the purposes of the processing, but the data is necessary for the establishment, exercise or defence of legal claims.
 - you have objected to processing pursuant to Article 21(1) of the GDPR pending us providing lawful grounds overriding your objection.
- f) **RIGHT TO DATA PORTABILITY** – you have the right to receive your personal data in a commonly used machine-readable format. You also have the right to transmit such data to another controller without hindrance from us, where the processing is carried out by automated means and based on consent given under Article 6(1)(a) or Article 9(2)(a) of the GDPR or by contract under Article 6(1)(b) of the GDPR; provided the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Your right to data portability is subject to the transfer of data are not adversely affecting the rights and freedoms of others.

- g) **RIGHT TO OBJECT** – you have the right to object to the processing or profiling of your personal data. If you do object we must immediately cease to process a profile your personal data unless there are legitimate legal reasons for us to continue to do so.
- h) **AUTOMATED INDIVIDUAL DECISION-MAKING, INCLUDING PROFILING** – unless you specifically agree, you have the right not to comply with any decision made solely by automated processing (including profiling) unless the decision relates to your entry into a contract between us or is authorised by Union or Member State law to which you are subject. If as a result of the above exclusions you of bound by the decision, we must implement suitable measures to protect your rights and allow you to interact with a (human) representative, to express your point of view and contest the automated decision.
- i) **RIGHT TO WITHDRAW DATA PROTECTION CONSENT** – you may withdraw your consent to processing your personal data at any time.
- j) **RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY** – you may lodge a complaint at any time with any relevant supervisory body having authority if you believe that our processing of your personal data infringes any regulation.

15.3 Data protection in relation to job applications

We must collect and process the personal data of job applicants for the purpose of their application procedure strictly in accordance with the rules of the relevant EU member state. The processing may be carried out electronically. If no employment contract is concluded, in the absence of other lawful reason not to do so, the application documents will be automatically erased two months after notification of the application have been rejected., provided that no other legitimate interests of the controller are opposed to the erasure.

15.4 Period for which the personal data will be stored

Your data will be stored for as long as permitted by the laws of your jurisdiction.

15.5 Existence of automated decision-making

As a responsible company, we do not use automatic decision-making or profiling.

16. COMPLAINTS HANDLING

If you are concerned that the way in which we have dealt with your personal information involves a potential breach of the Privacy Act, you may contact us at privacy.sgm@srglobal.com at any time, providing us with details in writing of your complaint. We will investigate such a complaint promptly and will contact you for further information if required.

If you feel that we have not satisfactorily addressed your complaint, you may also make a complaint to the office of the Australian Information Commissioner by visiting

www.oaic.gov.au or by writing to GPO Box 5218 Sydney NSW 2001 Australia or GPO Box 2999 Canberra ACT 2601 Australia.

All complaints should be made in writing detailing relevant information pertaining to the complaint and the parties involved in the alleged breach.

17. FURTHER INFORMATION

If you would like more information about how we handle your personal information, please contact us using the details below:

EMAIL: at privacy.sgm@srglobal.com

PHONE: 1800 244 388

CUSTOMER RELATIONS

Success Global Media Limited
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PYRMONT, NSW 2009 Australia.