

Situ: Privacy Policy

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Privacy Policy

General

Situ Communications Pty Ltd ACN 631 181 149 (ABN 51 631 181 149) and its related entities (referred to in this document ('**Policy**') as '**we**', '**us**', '**our**' or '**the company**') operate the <https://situ.com.au/> website, mobile applications and other online platforms ('**Site**').

We are committed to protecting the personal information we collect from you when you use our Site. The *Privacy Act 1988* (Cth) ('**Privacy Act**'), and the *Australian Privacy Principles* ('**APP**') govern the way in which we must manage your personal information and this Policy sets out how we collect, use, disclose and otherwise manage personal information about you.

We will not share or use your personal information, except as described in this Policy or unless you have otherwise provided us with your consent to do so.

Collection & Notice

Types of information collected

To assist us in providing you with the services provided via our Site ('**Services**'), we may collect information that personally identifies you or allows us to contact you ('**Personal Information**').

Personal Information can include *but is not limited to*:

- your name;
- your date of birth and/or age;
- contact details (including your address, email address and/or phone number);
- financial information (such as credit card or bank account numbers and billing information);
- information that your browser sends us whenever you visit our Site ('**Log Data**'). Log Data may include information such as your computer's internet protocol ('**IP**'), your location, the pages of our Site that you visit, the time and date of your visit and the time spent on those pages and other statistics, as well as the browser you use and language settings on your computer, phone, tablet or other device you are using to access our Site and/or Services.

The type of Personal Information that we collect and hold about you depends on your interaction with us (as explained in more detail below) and our Site.

As a further overview, we have set out below examples of information we may collect and hold from you:

- Profile Information:

Age, gender, residential address and other contact details. If you have attended an event, we may collect information relating to your event habits (e.g. the festivals, sporting events etc that you like to attend) if relevant to the Services.

- Social Media Information

Information that you choose to make available to us (e.g. the profile information on your Facebook page).

- Additional User Information

Your communications and feedback for the purposes of improving our Services.

- Contests and Promotions

We may collect your name, address, telephone number and other information that you have provided to us when signing up for contest and promotions, if relevant to the Services.

- Computer and Mobile Device Information

We access information from Microsoft and Google about the device and applications you use to access our Services. Device data mainly means your operating system version, device type and browser version. We will also collect your IP address.

- Information from Cookies and similar technologies

We may use cookies to track your movement throughout our website, for security. The cookie expires (and therefore is automatically deleted) when you end your browsing session (such as when you log out or close the browser). We also use Google Analytics and Microsoft Application Insights to track your behaviour across our sites and applications. Additional information on our use of cookies and similar technologies is outlined further in this policy.

- Information from Third Parties

If you access our Services from an external source (such as a link on another website or in an email), we record information about the source that referred you to us. Google analytics information is completely anonymised and can only be viewed by us in aggregate.

Purpose of collection

Personal Information is requested when you utilise our Site, request our Services or make an enquiry. Some provision of Personal Information is optional. However, if you do not provide us with certain types of Personal Information, you may not be able to enjoy the full functionality of our Site or access all Services.

We use your Personal Information in connection with our Services for the following primary purposes:

1. To provide you with the Services;
2. To help you quickly find software, services or information;
3. To help us create content most relevant to you;
4. To help us adapt the app to your required needs;
5. To alert you to product upgrades, special offers, updated information and other new services;
6. Account information:

We collect this information when you set up an account with us as either:

- (a) **‘Member Account Holder’** which is where you have received an invitation to join the platform or applications and are a member of an

	event or other project that is being managed through our platform or applications; or (b) ‘Admin Account Holder’ which is where you hold an admin account which enables you to both create and manage events and/or other projects through the platforms and applications that will require individuals to provide you with their personal data (such as, Member Account Holders) as well as provide us with your own personal data. As a Member Account Holder, you may respond to requests for information, complete forms or applications received through your account or log your attendance at particular events. You are a “data subject” as you are providing your personal data to us for processing; and As an Admin Account Holder you will be both a “data subject” for your own data that you provide to us and we collect and a “data controller” for participants data that we process on your instruction; 7. To otherwise communicate with you generally regarding our Services: If you make a payment to us, we may require your account details or other financial information that relates to your payment; 8. Profile Information: We collect this information so that we can provide Admin Account Holders with information as to the nature and demographic of people who are attending particular events; 9. Social Media Information: If you use Facebook or another social media platform to create or log into an account, we will collect information from your Facebook or relevant social media profile. We will only collect the information that you specifically provide to us; 10. Additional User Information: We collect information that you provide to us when you answer emails or surveys which we have conducted; 11. Contests and Promotions: It is necessary for us to collect this information when you voluntarily participate in contests and special promotions. Collection of this Personal Information by us only relates to details collected through our website by individuals voluntarily interacting for the purpose of entering contents and promotions; 12. Computer and Mobile Device Information: This information provides us with more details of who you are and how you access and use our Services; 13. Information from Cookies and similar technologies: This information helps us with security, and also provides us with more detailed information regarding who you are and how you access and use our Services.
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Cookies enable us to gather metrics about your event experiences and to tailor advertising to you.

You can turn off Cookies in your browser settings. More information on this point is contained further below in this policy.

Cookies relate to our website only and not apps developed for clients however, our apps do collect and store data similarly to our website; and

14. Information from Third Parties:

This information gives us a broad snapshot of the nature and use of our Services. However, it cannot be used to personally identify you.

We may also collect, use and hold your Personal Information for the purposes of (without limitation):

- (a) issuing tax invoices for Services we may provide to you from time to time;
- (b) facilitating our internal business operations, including the fulfilment of any legal requirements; and
- (c) analysing our Services and customer needs with a view to developing new or improved services. We may use third party services such as Google Analytics that collect, monitor and analyse this type of information in order to increase our Site's functionality (this is more particularly in reference to our website users) These third party service providers have their own privacy policies addressing how they use such information.

Method of Collection

Personal Information will generally be collected directly from you through the use of our app, user accounts, website or where you otherwise submit your details through our Site, social media or by email. We may also collect information from other sources, for example:

- 1. from third parties such as our related entities, other business partners, or your representatives;
- 2. from publicly available sources of information;
- 3. from our records of how you use our Services; and
- 4. from the third parties we list in the section of this Policy with the heading 'Use and Disclosure'.

We cannot maintain your privacy if you decide to contact us through public forums such as Facebook or other social media channels.

Whenever you add data, we may collect it and store it with your other Personal Information.

Cookies

Our Site uses cookies. Cookies are sent to your browser from a website and stored on your computer's hard drive. The main purpose of cookies is to identify users and to prepare customised web pages for them.

Cookies do not identify you personally, but they may link back to a database record about you. We use cookies to monitor usage of our Site and to create a personal

	record of when you visit our Site and what pages you view so that we may serve you more effectively. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Site or Services. External Links Our Site may contain links to other websites or social media. These linked sites are not under our control and we accept no responsibility for the conduct of those that operate linked websites or social media platforms. Before disclosing your Personal Information on any other website or platform, we recommend you examine the terms and conditions of using that website or platform and its privacy statement.
Use and Disclosure	Generally, we only use or disclose Personal Information about you for the purposes for which it was collected (as set out above) or for purposes which are directly related to one or more of our Services or functions and activities. We may disclose Personal Information about you to: 1.1 parties we involve to provide you with the Services. This includes, for example, financial institutions, advertisers and our related entities and other organisations with whom we have affiliations. 1.2 our third party product or service providers, who assist us in operating our business (including to assist us in providing you with the products and/or Services that you have requested or have expressed an interest in, customer support, market research, fraud detection and prevention services, payment services and marketing services). These service providers may not be required to comply with our Policy. 1.3 a third party where it is reasonably necessary to comply with a law, regulation, or valid legal process. If we are required to release your data or other Personal Information, we will provide you with notice unless prohibited by law. 1.4 a third party if it is necessary and permitted by law in connection with the sale, merger, bankruptcy, sale of assets or reorganisation of our company; and 1.5 inform you of community posts, contests and surveys where you direct your information to be used for this purpose. We do not disclose Personal Information collected by you on behalf of your customers and clients as part of your use of the app and our Services. You are responsible for dealing with such information in accordance with your obligations. We may share your Personal Information to other parties if you direct or consent to us doing so. These third parties are then responsible for the privacy of the shared information and we accept no responsibility or liability for the privacy policies or practices of these third parties. You can revoke your consent to share with the third party at any time by contacting us. We are not likely to disclose your Personal Information to overseas recipients.

How we use your Personal Information for Direct Marketing	We may also use your Personal Information so that we, and our related entities, can promote and market products and services that we think will be of interest to you (which may include products, services and offers provided by a third party). This marketing may be carried out in a variety of ways (including by email, SMS/MMS or social media) and may continue after you cease acquiring Services from us until you opt-out by calling +61 468 819 710 or emailing hello@situ.com.au You may opt-out of receiving emails by unsubscribing via the “Unsubscribe” link at the bottom of emails.
How we hold your Personal Information	We store your Personal Information in different ways, mainly in electronic form. We take appropriate and adequate precautions to protect your Personal Information from loss, misuse, unauthorised access or disclosure, alteration, or destruction. Your Personal Information is never shared outside the company without your permission, except under conditions explained above. Inside the company, data is stored in password-controlled servers with limited access. If we no longer need your Personal Information for the purposes for which it was collected or for purposes which are directly related to one or more of our Services or other functions and activities, we will take reasonable steps to securely destroy it or permanently remove all identifying features from that information. This obligation is subject to any legal requirement or court order to retain the information.
Our policies for Minors	Our Services are not directed at persons under the age of 18 (‘Minor’). We do not knowingly collect Personal Information from Minors. If you are a parent or guardian and become aware that a Minor under your care has provided us with Personal Information, please contact us. If we become aware that we have collected Personal Information from a Minor without verification of parental consent, we take steps to remove that information from our services.
How we handle data from international visitors	Our Sites are hosted and operated entirely in Australia and are subject to Australian law. Any Personal Information that you provide to us is being provided to us solely in Australia and will be hosted on Australian servers. If you are accessing our Site from outside of Australia, you consent to the transfer of your Personal Information to Australia. If you are accessing our Site or using our Services from outside of Australia, you consent to the application of Australia law and understand that Australian local laws may not offer the same privacy protections as the law of your jurisdiction.

How you can access your Personal Information and notice to parents	You may access the Personal Information we hold about you by making a written request to us. If you believe the Personal Information we hold about you is inaccurate, incomplete or out of date, please notify us immediately. We will take reasonable steps to correct the information so that it is accurate, complete and up to date. If you wish to access any of your Personal Information that we hold or would like to correct any errors in that information, please contact us using the contact details set out in the Contact Section of this Policy, so that we can consider and respond to your request.
Data Breach notification	We take our obligation to keep your Personal Information safe seriously. If any of our personal data systems are breached or data is misused or lost, then we will take all reasonable and practicable means to contact individuals whose Personal Information is involved. We will advise such individuals of the extent of the data breach (if known) and advise individuals of the most appropriate means of regaining control of their Personal Information. If appropriate, we will also report any eligible data breach to the Office of the Australian Information Commissioner in accordance with the Privacy Act.
Complaints	You may use the contact details below to notify us of any privacy complaint you have against us, including if you think that we have failed to comply with the APP or any binding APP code that has been registered under the Privacy Act. If you are unhappy with the way that we handle your complaint you may make your complaint to the Office of the Australian Information Commissioner.
Contact	If you have any queries or concerns about our Privacy Policy or the way we handle your Personal Information, please contact our privacy officer at: Email address: hello@situ.com.au Telephone: +61 468 819 710
Changes to our practices	This Policy is subject to change at any time. Please check our privacy policy on our Site, https://situ.com.au/ regularly for any changes.
More information	For more information about privacy in general, you can visit the Office of the Australian Information Commissioner website at http://www.oaic.gov.au/.
Consent	By accessing or using our Site or Services, you confirm that you have read this Policy and expressly and voluntarily grant your informed consent for us to deal with your Personal Information in accordance with this Policy. You can revoke your consent by contacting us using the contact details in the Content Section above. If you revoke our consent, you acknowledge and agree that failure to provide certain types of personal information may not give you access to the full functionality of the Site or our Services.