

Privacy Policy

Rights to privacy

Twenty Degrees Pty Ltd ('Twenty', 'we' or 'our') understands the importance of protecting an individual's right to privacy. This privacy policy sets out how we aim to protect the privacy of your personal information, your rights in relation to your personal information managed by us and the way we collect, use and disclose your personal information.

In handling your personal information, we are required to comply with:

Within Australia:

- (a) the Privacy Act 1998 (Cth) ('Act');
- (b) the Australian Privacy Principles; and
- (c) any privacy code enacted under the Act.

Outside of Australia we may be subject to any relevant international privacy regulations of the country where any personal information is collected, disclosed or stored.

This policy may be updated from time to time.

Personal information

Personal information is information that identifies an individual or from which an individual's identity can reasonably be ascertained.

Collection of statistical information

When you use our website, we may collect statistical information relating to your use of this website, including:

- (a) your server address;
- (b) your IP address;
- (c) your top level domain name (for example .com, .gov, .au, .uk etc);
- (d) the pages you accessed and documents downloaded;
- (e) the website you visited immediately prior to accessing this website;
- (f) your navigation patterns; and
- (g) the type of browser you are using.

Statistical information on its own may not necessarily identify an individual and may not constitute personal information. However, it provides us with statistics that we can use to analyse and improve our website.

Collection of personal information

Depending on your use of our website or our online platform, we may collect personal information relating to you. The kinds of personal information that we may collect include your name, address, e-mail address, home, mailing and business addresses, telephone numbers company name, job title and employer, nature of your business and information collected for business-related purposes.

We do not collect any personal information other than information that is required or directly relates to the primary purpose for which we have been engaged or may be engaged.

We may also collect personal information from third parties, either in Australia or overseas. We do not use or disclose that information other than for the purpose that the information is provided or disclosed to us.

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How does Twenty° collect personal information?

Generally, we collect your personal information directly from you, by requesting that you provide your personal information when you fill out an application form or other similar document or submit information to us via our website or online platform. There may be other occasions when we collect your personal information from you or from other sources, such as from a publicly maintained record, from an information services provider or from a related business of Twenty°.

Why do we need your personal information?

We collect your personal information for the purposes of:

- (a) providing access to our website and other related services;
- (b) providing access to and using our online platform;
- (c) responding to queries and feedback you submit to us;
- (d) processing your subscription to become a member of Twenty°;
- (e) facilitating our internal business operations;
- (f) providing you with information about our services that may be of interest to you; and
- (g) any other legal requirements which we must comply with.

You are under no obligation to provide your personal information to us. However, without receiving certain information from you, we may not be able to provide our services to you.

Who do we disclose your personal information to?

We disclose your personal information for the purpose for which we collect it or where you have consented to us disclosing this information.

The types of organisations to which we may disclose the personal information you provide us with include:

- (a) any third party service provider which we may engage to provide administration, process payments, technology, auditing, mailing, printing or other services;
- (b) our related bodies corporate and our partner organisations;
- (c) Government authorities where required to by law; and
- (d) our professional advisers (including legal and accounting firms, auditors, consultants and other advisers).

We may disclose your personal information to overseas recipients in circumstances permitted by the Australian Privacy Principles. Examples include contracting arrangements with a sub-licensee being disclosed to a master licensee of a particular territory.

We may use cloud based software or data storage located overseas in which case information may be stored, under our control, on computer servers located outside of Australia.

We will only transfer your personal information overseas if:

- (a) we have received your consent to the transfer of the information, unless the transfer is for your benefit and your consent is likely to be given;
- (b) it is a requirement of any law; or
- (c) the transfer is required for the performance under a contract between you and us.

By submitting your personal information to us, you expressly agree and consent to the disclosure, transfer, storing or handling of your personal information outside of Australia. In providing this consent, you understand and acknowledge that countries outside Australia do not always have the same privacy protection obligations as Australia in relation to personal information. However, as we are required to do under the Australian Privacy Principles, we have taken reasonable steps

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to ensure that your personal information will not be handled, held, used or disclosed by the overseas recipient in a way which does not comply with the Privacy Act and the Australian Privacy Principles or other relevant principles an overseas recipient may be required to uphold in that country are similar to the Australian Privacy Principles.

Security of your personal information

We will take reasonable steps to ensure that the personal information we hold is protected against misuse, loss, unauthorised access, modification or disclosure.

Can you access the personal information that we hold about you?

Under the Act, you have a right to access your personal information that is collected and held by us. If at any time you would like to access or change the personal information we hold about you, or you would like more information on our approach to privacy, please let us know.

To obtain access to your personal information, we may request that you provide us with proof of your identity. This is necessary to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected.

We will take all reasonable steps to provide access to your personal information within 30 days from your request. In less complex cases, we will attempt to provide information within 14 days.

If providing you with such access requires a detailed retrieval of your personal information, a fee may be charged for the cost of such retrieval and supply of information.

How to contact us

For further information or enquiries regarding your personal information, please contact Twenty°'s Privacy Compliance Manager at contact@twentydegrees.com or via our [online contact form](#).

Privacy complaints

Please direct all privacy complaints to Twenty°'s Privacy Compliance Manager. At all times, privacy complaints:

- (a) will be treated seriously;
- (b) will be dealt with promptly;
- (c) will be dealt with in a confidential manner; and
- (d) will not effect your existing obligations or effect the commercial arrangements between you and us.

The Privacy Compliance Manager will commence an investigation into your complaint. You will be informed of the outcome of your complaint following the completion of the investigation. In the event you are dissatisfied with the outcome of your complaint, you may refer the complaint to the Federal Office of the Privacy Commissioner.

If you have a complaint that you believe breaches a privacy regulation outside of Australia, please contact the relevant privacy authority within that country.