

Privacy Policy

Last updated 24.07.2020

1. Privacy statement

Station Five Pty Ltd ACN 169 440 859 (**we, us, our**) consider your privacy to be important and we take our responsibility to protect it seriously. We understand that you are concerned about your privacy, along with the confidentiality and security of any personal information that you provided to us.

This Privacy Policy (**Policy**) sets out how we collect, hold, use and disclose information about individuals who deal or interact with us. We treat all personal information collected by us in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**) and this Policy. If there is any inconsistency between the Privacy Act and this Policy, the Privacy Act will prevail to the extent of the inconsistency.

2. Personal information collected by us

Personal information is information or an opinion of an individual whose identity is apparent or can be reasonably ascertained. We collect a variety of personal information that is reasonably necessary for the purposes of conducting and improving our business and our services. This information is collected from a range of sources including, but not limited to:

- (a) through our website (<https://www.lambrosphotios.com>) (the **Site**);
- (b) through our services;
- (c) through our account creation process;
- (d) through marketing research;
- (e) via competitions and surveys;
- (f) by otherwise having some form of contact with us such as such as by mail, telephone, email, internet or intranet; and/or
- (g) through any of our other business activities or events.

Personal information collected by us includes, but is not limited to:

- (a) your name;
- (b) your address;
- (c) your time zone;
- (d) your contact details such as your mobile number, telephone number and email address;
- (e) your preferences and opinions relating to our services; and
- (f) all logs, which may include information such as your Internet Protocol (**IP**) address, browser type, browser version, clickstream data, the pages of our Site that you visit, the time spent on any pages of our Site and other log related information relating to your use of our Site.

We endeavour to only collect personal information from you, where it is reasonable and practical to do so.

3. Use of personal information

Much of the data we collect is aggregated, and this information is effectively anonymous to us. In general we use personal information for providing, evaluating, improving, personalising and developing our business and our services. More specifically we use personal information for:

- (a) improving our services and user satisfaction;
- (b) providing a service that has been requested;
- (c) providing support to you;
- (d) promoting and delivering our services to you;
- (e) determining whether an individual is suitable for a position within our business, as an employee or contractor for a current or future project;
- (f) our internal research and statistical purposes (including market segmentation and customer value analysis); and
- (g) enabling us to forward to you other information or material which we believe may be of interest to you.

3.1 Licences

a) Customer Data

- (i) The Customer hereby grants to Station Five a non-exclusive, non-transferable licence to use the Customer Data to perform its obligations under this agreement.
- (ii) The licence granted in sub-clause 3.1a)(i) above terminates upon the termination of this agreement for any reason.

b) De-identified Customer Data

- (i) The Customer hereby grants to Station Five a non-exclusive, non-transferable, licence to use De-identified Customer Data for purposes of, including but not limited to, Station Five using machine learning on the De-identified Customer Data to improve Station Five's suite of products and automation tools, including but not limited to the Licensed Software, which tools may or may not be used in performance of this agreement.
- (ii) The licence granted in sub-clause b)(i) above extends in perpetuity and survives termination of this agreement for any reason.

4. Protecting your personal information

4.1 Steps we take

We take reasonable steps to protect personal information we hold (including your personal information) from:

- (a) misuse, interference and loss; and
- (b) unauthorised access, modification or disclosure.

The precautionary steps we take to protect personal information include:

- (a) adopting measures to protect our computer systems and networks for storing, processing and transmitting personal information;
- (b) adoption of procedural and personnel measures for limiting access to personal information by our staff;
- (c) regularly reviewing our information collection, storage and processing practices; and
- (d) such other security measures we consider reasonable and appropriate from time to time.

Notwithstanding that we use our best endeavours to protect all personal information we collect and hold, we unfortunately cannot guarantee its complete security.

4.2 De-identifying and deleting personal information

When your personal information is no longer required to be kept by us, we will take reasonable steps to destroy or delete the personal information in a confidential manner.

5. Disclosure of personal information

5.1 Disclosure generally

We do not disclose your personal information to any third party, other than those requiring such information for the purposes for which the information was collected, including:

- (a) to external service providers so that they can provide financial, administrative or other services in connection with the operation and improvement of our business;
- (b) as permitted under the Privacy Act; and
- (c) with your consent, or if you are deemed to reasonably expect that your information would be passed to the person to whom the personal information is disclosed.

5.2 Information you make public

Certain services we provide and features on our Site are open to any other account holder to view, such as our blog, community forum and certain aspects of your personal profile. Any information you create or post in these locations may be available and accessible to other members of the Site.

The Site also enables you to upload, post, transmit, display, perform or distribute content, information or other data, which may include your personal information. Any information that you choose to disclose by means of such features becomes public information.

We strongly urge you to exercise caution when deciding to disclose your personal information by means of such features. You agree to assume all responsibility for all personal information that you have made public.

6. Competitions

6.1 Our competitions

Predominately all competitions offered by us are hosted on our servers and are conducted, with respect to the collection and use of personal information, in accordance with this Policy.

6.2 Third party competitions

Competitions run by a third party, such as by one of our sponsor or by one of our advertisers, will host their own contests on their servers and will collect their own personal information. Therefore, we strongly recommend that before signing up to any third party competition you carefully review the applicable privacy policy of that third party site.

7. Cookies

Cookies are files with small amounts of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your computer's hard drive.

Like many sites, we use "cookies" to collect information. 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 features of our Site.

8. Web beacons

Web beacons (also known as clear gifs, pixel tags or web bugs) are tiny graphics with a unique identifier, similar in function to Cookies, and are used to track the online movements of web users or to access Cookies.

Unlike Cookies which are stored on the user's computer hard drive, web beacons are embedded invisibly on web pages (or in e-mail).

Web beacons may be used to deliver or communicate with Cookies, to count users who have visited certain pages and to understand usage patterns.

Like many sites, we use web beacons to collect information which is done in accordance with this policy.

9. Overseas disclosure

9.1 Overseas IT service providers

We may disclose personal information to outsourced information technology service providers, including cloud computing providers and data storage providers, based overseas primarily located in the United States of America and Europe.

We will take reasonable steps to ensure such overseas recipients do not breach the Australian Privacy Principles (**APP's**) or are subject to laws or a scheme substantially similar to the APP's.

9.2 Disclosure for analytics

We may use Google Analytics to track your usage of our Site. Google Analytics is a web analysis service provided by Google. Google utilises the data collected to track and examine the use of the Site, to prepare reports on the Site's activities and share them with other Google services.

Google may use the data collected to contextualise and personalise the ads of its own advertising network. Personal data collected by Google includes cookie and usage data, which is processed in the USA. You can find Google's privacy policy here: <http://www.google.com.au/policies/privacy/>.

9.3 Consent to overseas disclosure

Other than as contemplated in this clause 9, we will only disclose your personal information to an overseas recipient if:

- (a) you consent to the transfer; or
- (b) the disclosure of the information is required or authorised by or under an Australian law, other applicable law or a court/tribunal order.

10. Third parties

Our Site may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the privacy policy of every site you visit.

We confirm that we have no control over, and assume no responsibility for, the content, privacy policies, or practices of any third party sites or services whatsoever.

You should be aware that your ability to opt-out of a third party tool or platform will depend on the conditions governing your agreement with that third party.

11. Accessing and updating your personal information

11.1 Access to Personal Information

We will provide you with access to your personal information held by us unless:

- (a) giving access would be unlawful; or
- (b) denying access is required under the Privacy Act or any other applicable law.

11.2 Request for Access

If you would like access to your personal information aside from your account information, you must contact us in writing making such a request. Following receipt of your request, we will contact you and either provide you with the information you have sought, or return to you with an explanation detailing why we will not provide you with the information.

11.3 Amending your personal information

We endeavour to keep all personal information we hold accurate, up to date and complete. If at any time you wish to correct any of your personal information and you have an account you may do so freely at any time via the Settings page following your log on.

If you wish to amend personal information that we hold that is not editable under your account, please contact us to request amendment. If we elect not to correct your information, we will notify you, within a reasonable time, of the reason for our refusal, the mechanisms available for you to complain about our refusal and such other matters required by the Privacy Act.

If you wish to have your Personal Information deleted, please let us know and we will take all reasonable steps to delete it, unless we need to keep it for legal reasons.

12. International users

If you are located outside the Australia and choose to provide your personal information to us, your personal information will be transferred to Australia and processed.

13. Complaints

We strive to ensure our compliance with this Policy and to regularly review our practices under it.

If at any time you have a complaint against us regarding our Policy, including a breach of the Privacy Act, we invite you to make a complaint. All complaints made will be dealt with in confidence. We endeavour to respond within 30 days of receipt of a complaint with a resolution or proposed resolution to the issue raised.

Please note that you may also make a complaint to the Office of the Australian Information Commissioner (**OAIC**) about the handling of your personal information. Information on making a privacy complaint can be found on the OAIC website at <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>.

14. Variations

We reserve the right to vary this Policy from time to time without further notice to you. Any variations made will be updated on our Site. It is your responsibility to check this Policy every now and again to ensure you are aware of any changes made to it. We will not reduce your rights under this Policy without using our best endeavours to first provide you with notice.

15. Further information

For any further information about this Policy please contact us via <https://www.stationfive.com/contact-us/>.