

VIDEOMY PRIVACY POLICY

1. INTRODUCTION

1.1. We are VideoMy Pty Ltd (ACN 608 089 112) (VideoMy, we, us). The VideoMy Privacy Policy (Privacy Policy) is provided to ensure you understand your rights and obligations when you access and navigate our website located at www.videomyjob.com (Website) and explains our personal information gathering practices in connection with personal information we receive both online (through our Website and our applications - please note that reference to "website" in this privacy policy should be read to include "applications") and offline (e.g. via the phone, in meetings and in other correspondence).

1.2. This policy sets out:

- what is considered personal information;
- what personal information we collect and hold;
- how we collect, hold, use or disclose personal information;
- the purposes for which we collect personal information;
- what happens if we are not able to collect personal information;
- how to seek access to and correct your personal information;
- whether we disclose personal information outside Australia; and
- how to contact us.
- 1.3. VideoMy respects the rights and privacy of all individuals and is committed to complying with the *Privacy Act 1988* (Cth) (**the Act**) and the Australian Privacy Principles and protecting the personal information we hold.
- 1.4. We may, from time to time, review and update this policy, including taking account of new or amended laws, new technology and/or changes to our operations. All personal information held by us will be governed by the most recently updated policy and we will give you notice of our revised policy by posting to our Website.
- 1.5. Please note that where you are a national within the European Economic Area (EEA), we are required to provide you with additional information about our processing activities. As well as this Privacy Policy, please refer to the European Appendix for this additional information.

2. WHAT IS PERSONAL INFORMATION?

When used in this policy, the term "personal information" has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. This may include (but is not limited to) your name, age, gender, postcode and contact details (including phone numbers and email addresses) and possibly financial information, including your credit card or direct debit account information. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.



3. WHAT PERSONAL INFORMATION DOES VIDEOMY COLLECT AND HOLD?

- 3.1. We collect the type of personal information required to assist with providing VideoMy's products and services and informing you about them.
- 3.2. This may include personal information such as:
 - personal or company name;
 - mailing or street address;
 - email address;
 - telephone number;
 - age or birth date;
 - demographic information such as post code, preferences and interests;
 - occupation, profession and job title;
 - details of what you have purchased from us or which of our services you have enquired about, together with any additional information necessary to deliver those services and to respond to your enquiries;
 - details of our interactions with you;
 - financial information, including your credit card, direct debit or PayPal account information;
 - details of your use of the Website, including your IP address;
 - use of "cookies" and other tracking technologies; and
 - any additional information relating to you that you provide to us directly through our website, by phone or in person, or information you have provided indirectly through use of our website or online presence through our representatives or otherwise.

4. HOW AND WHY DOES VIDEOMY COLLECT PERSONAL INFORMATION?

- 4.1. We collect your personal information directly from you unless it is unreasonable or impractical to do so. We do this in ways including:
 - via your access and use of our Website;
 - when you make any online purchases via our Website;
 - when you correspond with us by email;
 - via someone else who has provided us with your information; and
 - during conversations between you and us via phone, live chat or other instant messaging communications.
- 4.2. We may also collect personal information from third parties including third party companies such as law enforcement agencies and other government entities, e-commerce platforms, data suppliers, advertisers, mailing lists and contractors and business partners.
- 4.3. The primary purpose for which we collect information about you is to enable us to perform our business activities and functions, to communicate with you and to provide you with the best customer experience.
- 4.4. Other purposes for which we will collect or use your personal information are:



- (a) (**service delivery**) where we are required to collect and handle your personal information in order to provide you with the services we have contractually agreed to provide to you;
- (b) (**your experience**) to communicate effectively with you and optimise the customer experience we can deliver to you via our Website;
- (c) (research and development) for research and development purposes;
- (d) (marketing and advertising) to provide you with marketing materials we believe will be of interest to you;
- (e) (**monitoring**) to monitor certain activities that you undertake on our Website and administer our Website;
- (f) (**legal obligations**) where we need to use your personal information to comply with our legal obligations (including establishing, exercising or defending legal claims);
- (g) (**identity verification**) to allow you to participate in VideoMy identity verification and fraud prevention processes.
- 4.5. We may also provide your information to third parties for the purposes described in this policy including:
 - (a) third parties engaged by VideoMy to perform functions on its behalf, such as processing credit card information, order fulfilment, mailouts, debt collection, marketing, research and advertising; and third parties authorised by you to receive information held by VideoMy;
 - (b) efficient communications between you and VideoMy;
 - (c) secure storage and management of your files to allow VideoMy to deliver services to you; and
 - (d) notifying you of promotional material which may be suited to you.

4.6.

- 4.7. We may use your personal information for those purposes, for any other purpose listed on a collection statement at the point of collection, or in any other way if we ask for your consent first.
- 4.8. Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.
- 4.9. We will not knowingly collect personal information from a child under the age of 13 without the consent of their parent or guardian (in accordance with the Children's Online Privacy Protection Act of 1998 (COPPA).
- 4.10. We may disclose your personal information to:



- our employees, contractors, licensees or external service providers for the operation of our website or our business, fulfilling requests by you, including without limitation IT systems administrators or payment processors;
- specific third parties authorised by you to receive information held by us;
- the police, any relevant authority or enforcement body, or your Internet Service Provider
 or network administrator, for example, if we have reason to suspect that you have
 committed a breach of any of our terms and conditions, or have otherwise been engaged
 in any unlawful activity, and we reasonably believe that disclosure is necessary;
- as required or permitted by any law (including the Privacy Act).

5. WHAT HAPPENS IF WE CAN'T COLLECT YOUR PERSONAL INFORMATION?

- 5.1. Where practical, you may choose not to identify yourself, deal with us on an anonymous basis or use a pseudonym.
- 5.2. In some instances, if you do not provide us with required personal information described in this policy, we may not be able to provide you with the services you requested, either to the same standard, or at all.
- 5.3. As a result, VideoMy may need to suspend, cancel, decline, or renew the supply of goods and services (subject to our terms and conditions and relevant laws).

6. **USE OF FINANCIAL INFORMATION**

- 6.1. If you use our website to make purchases or other financial transactions (such as payment of invoices through the website for products you purchase offline), we collect information about the purchase or transaction. This includes payment information, such as your credit card or debit card number, billing details and other account and contact information (Financial Information).
- 6.2. We will only collect Financial Information from you with your prior knowledge and consent. You can access and browse our website without disclosing Financial Information.
- 6.3. We use your Financial Information solely to process payments for products or services you request through the use of our website. We only use and retain your Financial Information to complete payments you initiate, any Financial Information that is collected is solely for the purpose of transaction approval and the transfer of funds.
- 6.4. We provide data encryption throughout the payment process and only share your Financial Information with your credit card provider, third party payment processor or financial institution to process payments. The Financial Information we collect from you is strictly confidential and held on secured servers in controlled facilities.
- 6.5. We do not retain your Financial Information after the transaction is complete, unless you check a box through which you ask us to save your Financial Information for future product



- purchases or payments. If you do check that box, we will retain your Financial Information until you contact us and ask that we remove it from our databases.
- 6.6. We may use third party agents to manage online payment processing. These agents are not permitted to store, retain, or use your Financial Information or other personally identifiable information, except for the sole purpose of payment processing on our behalf. Any third party agent used by us is not authorized to use your Financial Information in any way other than to process payments and is required to keep any Financial Information it uses or collects confidential.

7. DIRECT MARKETING MATERIALS

- 7.1. We may send you direct marketing communications and information about services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS or email, in accordance with applicable marketing laws, such as the Spam Act 2004 (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.
- 7.2. In addition, at any time, you may opt-out of receiving marketing communications from us by contacting us (details below) or by using the opt-out facilities provided (e.g. an unsubscribe link). We will then ensure that your name is removed from our mailing list. We do not provide your personal information to other organisations for the purposes of direct marketing unless expressly authorised by you.
- 7.3. Even if you do opt out of receiving marketing communications from us, you agree that we may still send you information relevant to the supply of any services arranged by us.
- 7.4. If you receive communications from us that you believe have been sent to you other than in accordance with this policy, or in breach of any law, please contact us using the details provided below.

8. THIRD PARTY LINKS AND WEBSITES

- 8.1. Our website may contain links to other websites operated by third parties.
- 8.2. In order for VideoMy to deliver the services you request, we at times may allow access to personal information to third parties.
- 8.3. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website.
- 8.4. Third party websites are responsible for informing you about their own privacy practices. We advise you check the privacy policy and terms and conditions of any third party website or business before using their services.
- 9. CHANGES OF BUSINESS OWNERSHIP AND CONTROL



- 9.1. From time to time our business will change and this may involve us selling some or part of our company. The personal information you give us will, if it is appropriate, be transferred to any new owner but always under the terms of this Policy and they will only be allowed to use that data for the same purposes for which you supplied it to us.
- 9.2. Because of the number of users of our site we won't contact you in advance of any transfer.

10. WILL YOUR INFORMATION BE DISCLOSED OUTSIDE OF AUSTRALIA?

- 10.1. Your personal information will be accessed by VideoMy, our staff or suppliers and will be stored in Australia.
- 10.2. We will take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information. If you are located in the EEA, we must comply with specific rules when we transfer personal information from inside the EEA to outside the EEA. When we do this, we will use appropriate safeguards to protect any personal information being transferred.
- 10.3. If you are located in the EEA, you should note that the data that we process in relation to you may be transferred to and will be stored at a destination outside the EEA that may not be subject to equivalent data protection law. It may also be processed by staff situated outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, the fulfilment of orders, the processing of payment details and the provision of support services.
- 10.4. Where personal information is transferred in relation to providing our services we will take all steps reasonably necessary to ensure that it is subject to appropriate safeguards. We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. All personal data processed by is stored on secure servers. Any payment transactions will be encrypted using appropriate technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website or systems, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
- 10.5. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee or warrant the security of your data transmitted to our website and any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

11. HOW CAN YOU ACCESS AND CORRECT YOUR PERSONAL INFORMATION?

- 11.1. You may request access to any personal information we hold about you at any time by contacting us at support@videomyjob.com
- 11.2. Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We will not



charge for simply making a request and will not charge for making any corrections to your personal information. If you make an access request, we will ask you to verify your identity. There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others, or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

- 11.3. If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment, then we will add a note to the personal information stating that you disagree with it.
- 11.4. We request that you keep your information as current as possible so that we may continue to improve our service to you.

12. HOW WILL VIDEOMY MAKE SURE YOUR PERSONAL INFORMATION IS SECURE?

- 12.1. We will take all reasonable steps to protect the personal information that we hold from misuse, loss, or unauthorised access, including by means of firewalls, password access, secure servers and encryption of credit card transactions.
- 12.2. If you suspect any misuse or loss of, or unauthorised access to, your personal information, please let us know immediately.
- 12.3. If we suspect any misuse or loss of, or unauthorised access to, your personal information we may inform you of that suspicion and take immediate steps to limit any further access to, or distribution of, your personal information. If we determine that the breach is likely to result in serious harm to you and we are unable to prevent the likely risk of serious harm with remedial action, we will take action in accordance with the Privacy Act 1988 (Cth).
- 12.4. If we receive unsolicited personal information that we are not permitted to collect under this privacy policy, or within the confines of the law, we will destroy or de-identify the unsolicited personal information as soon as practicable if it is lawful and reasonable to do so. We will destroy or de-identify your personal information if we no longer require it to deliver our services as soon as practicable if it is lawful and reasonable to do so.

13. DOES VIDEOMY USE "COOKIES"

- 13.1. When you use our Website, products or services, VideoMy or our service providers may obtain information using technologies such as cookies, tags, web beacons, and navigational data collection (log files, server logs, and clickstream data) to better understand your user experience. For example, VideoMy or our service providers may collect information like the date, time and duration of visits and which webpages are accessed.
- 13.2. When you access our website, we may send a "cookie" (which is a small summary file containing a unique ID number) to your computer. This enables us to recognise your computer and greet you each time you visit our website, without bothering you with a request to register



- or log-in. It also helps us keep track of products or services you view, so that we can send you news about those products or services.
- 13.3. We also use cookies to measure traffic patterns, to determine which areas of our websites have been visited, and to measure transaction patterns in the aggregate. We use this to research our users' habits so that we can improve our online services. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.
- 13.4. We may also log IP addresses (the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track user movements, and gather broad demographic information.
- 13.5. This information is generally not linked to your identity, except where it is accessed via links in VideoMy emails or where you have identified yourself. We may also collect anonymous data (which is not personal information) relating to your activity on our website (including IP addresses) via cookies. We generally use this information to report statistics, analyse trends, administer our services, diagnose problems and target and improve the quality of our services. To the extent this information does not constitute personal information because it does not identify you or anyone else, the Australian Privacy Principles do not apply and we may use this information for any purpose and by any means whatsoever.

14. HOW CAN YOU COMPLAIN ABOUT PRIVACY BREACHES?

- 14.1. If you believe your privacy has been breached by us, have any questions or concerns about our Privacy Policy please, contact us using the email support@videomyjob.com and provide details of the incident so that we can investigate it.
- 14.2. We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in a timely and appropriate manner.
- 14.3. If you are not satisfied with the outcome of our investigation, then you may request that an independent person (usually the Commonwealth Privacy Officer) investigate your complaint.

15. WHO CAN YOU CONTACT ABOUT YOUR PERSONAL INFORMATION?

15.1. To contact VideoMy about your personal information, concerns or complaints, email support@videomyjob.com or alternatively, write to VideoMy at Level 17, 31 Queen Street, Melbourne, 3000 VIC, Australia.



EUROPEAN APPENDIX

This European Appendix forms part of the Privacy Policy and applies if you are based in the EEA during your interactions with us (other than where you are in the EEA solely for travel purposes). This European Appendix sets out the additional information that we are required to provide to you under European data protection laws, including information about the additional rights you may have under European data protection laws. This European Appendix should be read alongside the Privacy Policy and terms used in this European Appendix have the meaning given in the Privacy Policy.

1. Why do we collect your personal information, and who do we disclose it to?

When we use your personal information, we take care to ensure that it is used in an appropriate way. Use of personal information (and special categories of personal information) under European data protection law must be based on one of a number of legal grounds and we are required to set out the grounds in respect of each use in the Privacy Policy. In the table below, we have set out the relevant grounds that apply to each purpose mentioned in section 4 of the Privacy Policy. You can find an explanation of each of the grounds relied on at section 2 of this European Appendix:

Purposes of the data processing	Use bases				
4.4(a) Service Delivery	contract performance				
	• legitimate interests (to allow us to perform our				
	obligations and provide services to you)				
4.4(b) Your Experience	contract performance				
	legitimate interests (to allow us to correspond with you				
	in connection with our services)				
4.4(c) Research and Development	contract performance				
	legitimate interests (to allow us to maintain and improve				
	the quality of our services and products)				
4.4(d) Marketing and Advertising	legitimate interests (to market our products and				
	services)				
	consent (in relation to certain electronic marketing				
	where required by law) (which can be withdrawn at any				
	time)				
4.4(e) Monitoring	contract performance				
	legitimate interests (to ensure the quality and legality of				
	our services)				
	legal obligations				
	For special categories of personal information: • legal claims				
	legal claims				
	legitimate interests (to ensure the quality and legality of				
	our services)				



	legal obligations			
4.40 0				
4.4(f) Legal Obligations	contract performance			
	legal obligation			
	legitimate interests (to cooperate with law enforcement			
	and regulatory authorities)			
	legal claims			
	legitimate interests (to allow us to provide you with the			
	content and services on our websites)			
	For special categories of personal information:			
	legal claims			
	substantial public interest (to prevent or detect crime or			
	fraud)			
4.4(g) Identity Verification	contract performance			
	legal obligation			
	legitimate interests (to cooperate with law enforcement			
	, .			
	and regulatory authorities)			
	legal claims			
	legitimate interests (to allow us to provide you with the			
	content and services on our websites)			

2. Legal grounds for use of personal information

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Consent	where you have consented to our use of your personal information. You may		
	withdraw your consent to the use of your personal information by contacting us as		
	set out at section 6 of this European Appendix.		
Contract	where we are required to collect and handle your personal information in order to		
performance	provide you with the services that we have contractually agreed to provide to you.		
Legal	where we need to use your personal information to comply with our legal		
obligation	obligations.		
Legitimate	Where we have a legitimate interest in using your personal information.		
interests			
	We will only rely on this legal ground if we consider that our interest in using your		
	personal information for the relevant purpose is not outweighed by any interests		
	that you may have, or any prejudice that you may suffer, from the relevant use of		
	your personal information.		
Legal grounds for use of the special categories of personal information			
Legal claims	where your personal information is necessary for us to establish, exercise or		
	defend any legal claims.		
Substantial	where we need to process your personal information for reasons of substantial		
public interest	public interest set out in EU law or the laws of the member state in which you are		
	based.		



3. Export outside the EEA

- 3.1 Your personal information will be accessed by staff or suppliers, transferred, and/or stored outside the EEA, including to Australia and other countries which have a lower level of data protection than under EU DP law.
- 3.2 When we transfer personal information from inside the EEA to outside the EEA, we will use appropriate safeguards to protect any personal information being transferred.

4. Retention periods

Our retention periods for personal information are based on business needs and legal requirements. We will retain your personal information for as long as your account is active and otherwise as long as is necessary for the processing purpose(s) for which it was collected and any other permitted linked purpose. Where personal information is no longer needed, we either irreversibly anonymize the data (in which case we may further retain and use the anonymized data) or securely destroy the data.

5. Your rights

- 5.1 Under certain conditions, you may have the right under EU data protection law to ask us to:
 - (a) provide you with further details on how we use and process your personal information;
 - (b) provide you with a copy of your personal information that we hold;
 - (c) update any inaccuracies in the personal information we hold;
 - (d) delete personal information we no longer have grounds to process;
 - (e) to ask us to transmit the personal information you have provided to us and we still hold about you to a third party electronically; and
 - (f) restrict how we process your personal information whilst we consider an inquiry you have raised.
- 5.2 In addition, under certain conditions, you have the right to:
 - (a) where processing is based on consent, withdraw the consent;
 - (b) object to any processing of personal information that we process on the "legitimate interests" or "public interests" grounds, unless our reasons for the underlying processing outweighs your interests, rights and freedoms; and
 - (c) object to direct marketing (including any profiling for such purposes) at any time
- 5.3 You can exercise these rights by contacting us in accordance with section 6 of this European Appendix.
- 5.4 These rights are subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege). We will respond to most requests within one month.



5.5 If we are unable to resolve an inquiry or a complaint, you have the right to contact the data protection regulator in the EEA country in which you are based. A list of the data protection regulators and their contact details can be found at http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080.

6. Contact details

6.1 We are the "data controller" of your personal information. Our contact details are set out below:

Name	Registered Address	Country of Establishment	Registration Number
VIDEOMY PTY LTD	Level 17, 31 Queen Street, Melbourne, 3000 VIC, Australia	Australia	ACN: 608 089 112

6.2 Please contact support@videomyjob.com if you have any questions or would like to exercise any of your rights under EU data protection law.

VIDEOMY COOKIE POLICY

Consent

By using this website www.videomyjob.com (the "Website") you consent to the use of cookies in accordance with this Cookies Policy. You will have seen a pop up to this effect on your first visit to this website; although it will not usually appear on subsequent visits you may withdraw your consent at any time by following the instructions below.

Disabling cookies

If you do not agree to the use of these cookies, you may disable them. Please note that some of the services will not function as well as we would like them to if cookies are disabled.

Where the organization setting the cookie provides an automated disabling tool in respect of its cookie(s) we list the name of that organization, the category of cookies it sets together with a link to its automated disabling tool. In all other cases, we list the names of the cookies themselves and their source at the date of this Cookies policy so that you can easily identify and disable them if you want through your browser controls.

Some browsers make is possible for you to signal that you do not want your internet browsing activity to be tracked. Disabling tracking may interfere with some uses of the Website and the services provided on the Website.

After your initial visit to the Website we may change the cookies we use. This cookies policy will always allow you to know who is placing cookies, for what purpose and give you the means to disable them so you should check it from time to time.



What are cookies?

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating web domain on your subsequent visits to that domain. Most web pages contain elements from multiple web domains so when you visit the Website, your browser may receive cookies from several sources. Cookies are useful because they allow a website to recognize a user's device. Cookies allow you to navigate between pages efficiently, remember preferences and generally improve the user experience. They can also be used to tailor advertising to your interests through tracking your browsing across websites.

Session cookies are deleted automatically when you close your browser and persistent cookies remain on your device after the browser is closed (for example to remember your user preferences when you return to the site).

What types of cookies does www.videomyjob.com use?

We describe the categories of cookies www.videomyjob.com use below.

A. Strictly necessary cookies

These cookies are essential in order to enable you to move around the website and use its features. Without these cookies, services you have asked for (such as navigating between pages) cannot be provided.

B. Performance cookies

We make use of analytic cookies to analyse how our visitors use our Website and to monitor Website performance. This allows us to provide a high quality experience by customizing our offering and quickly identifying and fixing any issues that arise. For example, we might use performance cookies to keep track of which pages are most popular, which method of linking between pages is most effective, and to determine why some pages are receiving error messages. We might also use these cookies to highlight articles or site services that we think will be of interest to you based on your usage of the website. The information collected by these cookies is not associated with your personal information by us or by our contractors.

C. Website functionality cookies

We make use of cookies to provide you with certain functionality. For example, to remember choices you make (such as your user name, language or the region you are in), or to recognize the platform from which you access the site, and to provide enhanced and more personal features. These cookies are not used to track your browsing on other sites.



E. HTML email web beacons

Our emails may contain a single, campaign-unique "web beacon pixel" to tell us whether our emails are opened and verify any clicks through to links within the email. We may use this information for purposes including determining which of our emails are more interesting to you, to query whether users who do not open our emails wish to continue receiving them. The pixel will be deleted when you delete the email. If you do not wish the pixel to be downloaded to your device, you should select to receive emails from us in plain text rather than HTML.

F. Use of IP addresses and web logs

We may also use your IP address and browser type to help diagnose problems with our server, to administer our Website and to improve the service we offer to you. An IP address is a numeric code that identifies your computer on the internet. Your IP address might also be used to gather broad demographic information.

We may perform IP lookups to determine which domain you are coming from (e.g. google.com) to more accurately gauge our users' demographics.

Cookies policy does not cover third party websites

Please note that this cookies policy does not apply to, and we are not responsible fo the privacy practices of third party websites which may be linked to this Website.

Changes to the Cookies Policy

We may update this cookies policy and we would encourage you to review the policy from time to time to stay informed of how we are using cookies. This cookies policy was last updated on 13th September 2019.

