



# Introducing Privacy Policy

Last updated: 4 February 2019

## 1. We respect your privacy

1.1. In this policy, 'we' are, individually and collectively, Introducing Pty Ltd ACN 629 926 085 and RL IP Holdings Pty Ltd 629 926 003 and any related bodies corporate.

1.2. We respect your right to privacy and are committed to safeguarding the privacy of our customers and software application users. We are committed to compliance with privacy laws which apply to our businesses and which set out standards for the management of personal information. This policy outlines our personal information management practices applying to the personal information of individuals in respect of their dealings with us.

1.3. "Personal information" is information we hold which is identifiable as being about you and has the meaning given under the Privacy Act 1988.

## 2. Collection of personal information

2.1. We will, from time to time, receive and store personal information you enter onto our software application 'Introducing', provide to us directly or give to us in other forms.

2.2. The personal information we collect and hold is what we consider reasonably necessary for our business functions and activities.

2.3. You may provide basic information such as your name, phone number, address and email address to enable us to send information, provide updates and process your product or service order. We may collect additional information at other times, including but not limited to, when you submit a video via the mobile application, when you provide feedback, when you provide information about your personal or business affairs, change your content or email preference, respond to surveys and/or promotions, provide financial or credit card information, or communicate with our customer support.

2.3. Additionally, we may also collect any other information you provide while interacting with us.

2.4. You have the option of not identifying yourself or of using a pseudonym when dealing with us. But not where this is impractical or where the law or a court order provides otherwise. Given our recruitment services are of a highly personalised nature, it is sometimes not possible to utilise our service without identifying yourself.



### **3. How we collect your personal information**

3.1. We collect personal information from you in a variety of ways, including when you interact with us electronically or in person, when you access our software application and when we provide our services to you.

3.2. We may also collect personal information about you by accessing data from other sources and then analysing that data together with the information we already hold about you in order to facilitate a better service to you by us. When you visit our website, social media pages or software applications or click on our advertisements displayed on the online media of other companies, we may collect information about you using technology which is not apparent to you, for example “cookies”. If you fail to accept the use of cookies, you may not experience optimum website performance. There is a lot of information available about how cookies work and how to change your browser’s cookie preferences. For example, see All about cookies and your privacy.

3.3. We may also collect information about you from third parties, including potential employers, past employers or referees, to provide our services to you. By providing your personal information, and engaging our services, you consent to such behaviour by us.

### **4. Use of your personal information**

4.1. When we collect, hold and use your personal information, we do so primarily to provide our recruitment services to you and provide you with access to our software application.

4.2. We may also use personal information collected from you to provide you with information, updates and additional services. We may also make you aware of new and additional products, services and opportunities available to you. We may use your personal information to improve our products and services and better understand your needs.

4.3. We may make third party social media features available to users via our software application. We cannot ensure the security of any information you choose to make public in a social media feature. Also, we cannot ensure that parties who have access to such publicly available information will respect your privacy.

4.4. We may contact you by a variety of measures including, but not limited to telephone, email, SMS or mail.

4.5. We may use some of your personal information to market to you and to others and for incidental purposes. Not all information collected in respect of you is used for marketing and the majority of information is collected solely for the purpose of providing access to our website, software application and any account you may have with us, and our services to you. We may collect, hold, use and disclose your personal information for other purposes which are within reasonable expectations or where permitted by law. When marketing to you, your personal information is only ever used or disclosed for our own purposes. You



may opt out of our direct marketing to you. Our direct marketing materials will tell you how to do this.

## **5. Disclosure of your personal information**

5.1. We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this policy. Personal information is only supplied to a third party when it is required for the delivery of our services.

5.2. We may from time to time need to disclose personal information to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, in the course of a legal proceeding or in response to a law enforcement agency request.

5.3. We may also use your personal information to protect the copyright, trademarks, legal rights, property or safety of our business, our application, website and customers or third parties.

5.4. Information that we collect may from time to time be stored, processed in or transferred between parties located in countries outside of Australia. These may include, but are not limited to, the USA, India and Singapore.

5.5. If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our user databases, together with any personal information and non-personal information contained in those databases. This information may be disclosed to a potential purchaser under an agreement to maintain confidentiality. We would seek to only disclose information in good faith and where required by any of the above circumstances.

5.6. By providing us with personal information, you consent to the terms of this Privacy Policy and the types of disclosure covered by this policy. Where we disclose your personal information to third parties, we will request that the third party follow this policy regarding handling your personal information.

## **6. Security of your personal information**

6.1. We are committed to ensuring that the information you provide to us is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure. Personal information we hold is generally stored in computer systems. These may be operated by us or by our service providers.

6.2. From time to time we may make a business decision to store our data with a trusted service provider who is in the business of providing data storage and processing services. Examples are those who store and process our email and mobile application data. These



services commonly involve diverse geographic locations which change from time to time for reasons which include data protection and processing efficiency. Where these services are used by us, it is not practical for us to notify you of which country your personal information may be located in.

6.3. The transmission and exchange of information is carried out at your own risk. We cannot guarantee the security of any information that you transmit to us, or receive from us. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that personal information that we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

## **7. Access to your personal information**

7.1. You may request details of personal information that we hold about you in accordance with the provisions of the Privacy Act 1988. Before we provide you with access to your personal information we may require some proof of identity. A small administrative fee may be payable for the provision of information in circumstances where substantial effort is required on our part.

7.2. If you would like a copy of the information which we hold about you or believe that any information we hold on you is inaccurate, out of date, incomplete, irrelevant or misleading, please email us at [hello@introducing.io](mailto:hello@introducing.io) or write to us at Level 3/48 Hunter St, Sydney, New South Wales, 2000.

7.2. We reserve the right to refuse to provide you with information that we hold about you, in certain circumstances set out in the Privacy Act.

## **8. Complaints about privacy**

8.1. If you wish to complain about a breach of the privacy rules that bind us, you may contact us at [hello@introducing.io](mailto:hello@introducing.io) or Level 3/48 Hunter St, Sydney, New South Wales, 2000. We may ask you to put your complaint in writing and to provide details about it. We may discuss your complaint with our personnel and our service providers and others as appropriate.

8.2. We will investigate the matter and attempt to resolve it in a timely way. We will inform you in writing about the outcome of the investigation. If we do not resolve your complaint to your satisfaction and no other complaint resolution procedures are agreed or required by law, we will inform you that your complaint may be referred to the relevant privacy regulator for further investigation and will provide you with the regulator's contact details.

8.3. More information about privacy law and privacy principles is available from the privacy regulator. The privacy regulator in Australia is the Privacy Commissioner: [www.oaic.gov.au](http://www.oaic.gov.au) (email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)).

## **9. Software application - Opt out right**



9.1. You can stop all collection of information by our software application easily by uninstalling the application. You may use the standard uninstall processes as may be available as part of your mobile device or via the mobile application marketplace or network. You can also request to opt-out via email, at [hello@introducing.io](mailto:hello@introducing.io).

## **10. Changes to Privacy Policy**

10.1. Please be aware that we may change this Privacy Policy in the future. We may modify this policy at any time, in our sole discretion and all modifications will be effective immediately upon our posting of the modifications on our website or notice board. In most circumstances we will try to provide you with at least two weeks prior notice of the change on our website at [introducing.io](http://introducing.io). Please check back from time to time to review our Privacy Policy.

## **11. Software Application**

11.1. Application Use - When you use our software application we may collect certain information such as mobile unique device ID, the IP address of your mobile device, mobile operating system, the type of mobile internet browsers you use, and information about the way you use the application. This information is used in an aggregated manner to analyse how people use our site, such that we can improve our service.

11.2. Cookies - We may from time to time use cookies on our software application. Cookies are very small files which a website uses to identify you when you come back to the application and to store details about your use of the application. Cookies are not malicious programs that access or damage your computer, tablet or smartphone. Most devices automatically accept cookies but you can choose to reject cookies by changing your device settings. However, this may prevent you from taking full advantage of our application.

11.3. Automatic collection - The software application may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile devices unique device ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browsers you use, and information about the way you use the application. We may de-identify this data and your personal information collected via the application. We may do this for use and disclosure of the anonymous data for various data analytics purposes.

11.4. Third parties - Our software application may from time to time have links to other applications or websites not owned or controlled by us. These links are meant for your convenience only. Links to third party applications and websites do not constitute sponsorship or endorsement or approval of these third parties. Please be aware that we are not responsible for the privacy practices of other such applications or websites. We encourage our users to be aware, when they leave our application or website, to read the privacy statements of each and every application or website that collects personal identifiable information.



11.5. Geo-location - When you visit the mobile application, we may use GPS technology (or other similar technology) to determine your current location in order to determine the city you are located within and display a location map with relevant advertisements. We will not share your current location with other users or partners.

## **12. Limits of this policy**

12.1. This is a policy only. There may be additional privacy notices and terms relevant to you depending on the nature of your dealings with us. We have separate charters concerning our employees – this policy does not apply to the personal information of our employees in their capacity as such.