PRIVACY @ PIXEVETY
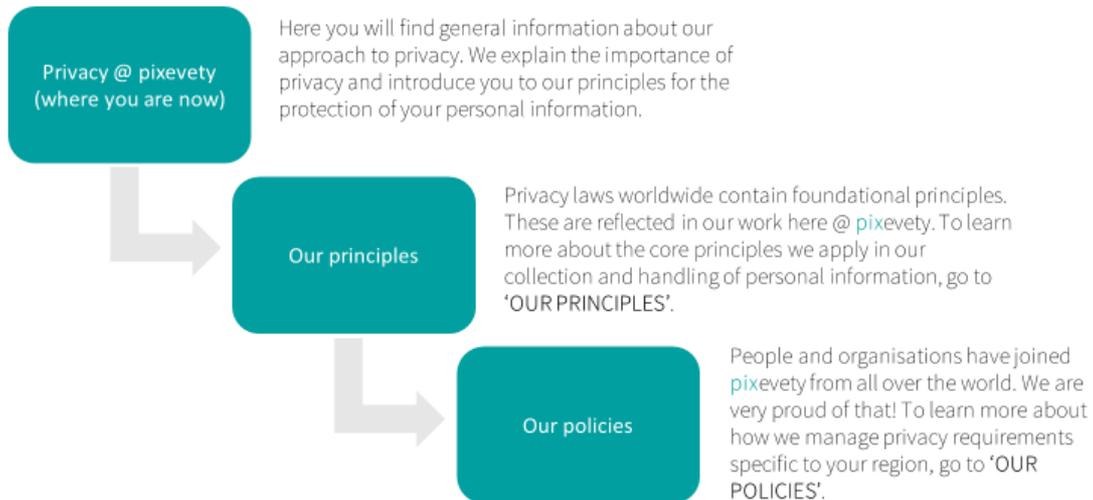
Welcome! This is where you will find information about privacy @ pixevety. To make this huge topic a little easier to navigate, we have taken a layered approach.

Your rights and obligations

At pixevety, we believe that you have a right to privacy and to control, to the greatest extent possible, what happens to your personal information.

As a company that provides a service to you, we have obligations under privacy law to ensure that personal information is collected and handled in a way that is fair and within your reasonable expectations.

To ensure *your rights* and *our obligations* are upheld, we stick to globally recognised privacy principles in our collection, use, storage, security, disclosure, and any other handling of personal information. We also follow the privacy rules of the countries within which we operate.

PERSONAL INFORMATION

Depending on where you are in the world, the definition for personal information may vary a little. In simple terms, it is **information that identifies you, or could easily lead to you being identified**.

You might know personal information as 'personal data' or 'personally identifiable information (PII)' or some other term… If the privacy law in your region refers to personal information by one of these terms, you will see the correct term used when you access the document for your region within Our Policies section provided below. We hope that helps!

THE PRINCIPLES WE FOLLOW

The countries where we operate all have privacy laws that contain rules for how organisations like ours must collect, use, store, secure, disclose and otherwise manage your personal information. These laws contain principles to guide our decision-making, and globally, the principles are very similar.

To help us ensure best privacy practice no matter where in the world we are providing our services, pixevety has adopted the following principles as our baseline:

Openness/transparency
Our personal information handling practices are visible and accessible.

Individual participation
We provide you with choice and control around what happens to your personal information.

Collection limitation
We lawfully and fairly collect only the personal information we need. We collect it with your knowledge and, where required, with your consent.

Purpose specification
We are clear about the purposes for which we collect personal information, and this is made known to you up front.

Data quality
We use only the required and appropriate personal information for a task, and ensure that it remains accurate, complete and up to date.

Use & disclosure limitation
We only use or disclose personal information for the purpose we collected it, unless the law permits or requires something else.

Security safeguards
We protect personal information using a range of physical, technical and administrative safeguards.

Access and amendment
We support your right to access, and make corrections to, the personal information we hold about you.

Accountability
We will regularly review our personal information management practices. If we receive a privacy complaint, we will manage it in a timely manner.

You can find out more about how we apply these principles in practice by reading Our Principles.

Updates

The world is changing… and so is the privacy landscape we operate in. This means we might need to update the information here, including Our Principles and Our Policies, from time to time to ensure that our personal information handling practices are correctly reflected. This may occur without notice; however, we will always post a "last revised" date for your information and (if the changes are significant) we will make sure you are aware.

Ways we make sure you are aware can include: an email to the address connected to your pixevety account, a notification banner on our brochure site or a pop-up notice on the pixevety platform or within our mobile app.

Questions?

It is important to us that you are able to understand our approach to privacy and we have taken care to make the information here easy to read and digest. If you have any questions, we encourage you to read through our FAQs. If you don't find the answer you are looking for, please contact us through any of the following channels:

post:	phone:	email:
Privacy Officer c/o PO Box 7056 Brookvale NSW Australia 2100	1300 438 389 +61 2 9194 0940 +1 888 747 4749	privacy@pixevety.com

OUR PRINCIPLES

The countries where we operate all have privacy laws in place that include principles for how personal information is to be handled throughout its lifecycle. These principles all have a common thread, based on globally accepted fair information practices, and they inform and guide how we collect, use, store, secure, disclose and otherwise manage your personal information.

What we do

We are a digital service provider. We offer people and organisations the ability to manage their photos and videos in a secure, permission-based environment. We care deeply about your privacy and have designed our services and business model to reflect our commitment to the fair and appropriate handling of your personal information.

Our business model allows both individuals and organisations to use the **pix**evety platform, which may be accessed **via the internet** or **by using our mobile app**. You use our platform when:

- you are our **customer,** and/ or
- **an organisation** is our customer and they are using the **pix**evety platform to manage your images.

When our platform is used by an organisation (such as a school or sporting club), Pixevety Pty Ltd is considered a **service provider** to that organisation. So, if you registered with us in order to join an organisation's Gallery, be sure to also read their privacy policy!

The principles we follow

The following **core privacy principles** provide a strong foundation for privacy @ **pix**evety. We have detailed here how we apply these principles in practice:

OPENNESS/TRANSPARENCY

Our personal information handling practices are visible and accessible.

Our Terms require you to understand our privacy practices before you can use the **pix**evety platform. We use the layered approach to communicate the information you need.

The privacy policy relevant to your region can be found in Our policies. In addition to the information here, you can read more about our approach to privacy in our FAQs.

The world is changing… and so is the privacy landscape we operate in. This means we might need to update the information displayed in Privacy @ pixevety, Our Principles and Our Policies from time to time to ensure that our personal information handling practices are correctly reflected. This may happen without notice; however, we will always post a "last revised" date for your information and (if the changes are significant) we will make sure you are aware.

Ways we make sure you are aware can include: an email to the address connected to your pixevety account, a notification banner on our brochure site or a pop-up notice on the pixevety platform or on our mobile app.

INDIVIDUAL PARTICIPATION

We provide you with choice and control around what happens to your personal information.

> Individual participation happens when you give consent for us to collect your personal information. It's additionally about how personal information is managed on the pixevety platform (you're in the driver's seat), and your own obligations before uploading images of a person (you must ask them first).

Handling of personal information, generally

Since it is impossible to use the pixevety platform without providing personal information, we ask for your consent at the outset. Once you start using the pixevety platform you have agreed to our collection and handling of your personal information.

Sensitive information

Our platform collects and manages your images – including photos, digital photos and videos. Depending on the region you are in, images may be "sensitive information" if they are considered a biometric or reveal information that identifies your religion, sexual orientation or political affiliation (e.g., an image of you wearing particular clothing or adornments may reveal your religion).

Images - our permission-based approach

We handle the images you upload to the pixevety platform based on your permissions (which you can change at any time). Our platform will only do with your images what you allow or agree to within the platform's privacy settings.

Personal information of other people

As set out in our Terms, if you intend to upload the images of *people other than you* to the pixevety platform, you must first have their consent to:

- upload to and manage their images using the pixevety platform, and
- use and disclose their images for your purposes.

This includes making them aware of our privacy practices. Where organisations such as schools are using our platform to manage images, the consent management module may assist.

Personal information of children under age 16

As set out in our Terms, we don't knowingly collect or solicit personal information from anyone under the age of 13.

In addition, it is a condition of using our platform that, if you intend to upload the images of a child under age 16 to the platform, you must first have consent from the child's parent (or legal guardian) to:

- upload to and manage the child's images using the pixevety platform, and
- use and disclose the child's images for your purposes.

This includes making the parent (or legal guardian) aware of our privacy practices. Where organisations such as schools are using the pixevety platform to manage images of a child under age 16, the consent management module may assist.

COLLECTION LIMITATION

We lawfully and fairly collect only the personal information we need. We collect it with your knowledge and, where required, with your consent.

We only ask for personal information when we have a justifiable business purpose for using it. If we don't need your personal information to achieve our purpose, then we simply will not collect it.

Depending on our relationship with you, and what you wish to do on the pixevety platform, the personal information we collect is:

- name
- contact details
- images within user galleries (e.g., digital photo or video)
- key metadata relating to images (e.g., name or location of the person featured in an image)
- facial recognition data (encrypted and Gallery specific)
- other personal information you provide during the course of using the pixevety platform (e.g., your preferred privacy settings), or when you ask us to provide additional services (e.g., inviting another person to have access to your Gallery)
- personal information contained in documents or text files (other than images) that you choose open or share using the platform
- account-related information (e.g., payment history)

PURPOSE SPECIFICATION

We are clear about the purposes for which we collect personal information, and this is made known to you up front.

Before you give your personal information to us, you see a **collection notice** which explains why we need those particular pieces of personal information.

You will find **collection notices** when you 'contact us' on the brochure site and throughout the sign-up process in our platform. You may also find them in documents (paper and electronic) when an organisation using us as a service provider needs to make you aware of their purposes for using the pixevety platform.

Generally, we collect personal information when you:

- contact us via our brochure site to learn more about whether pixevety is right for you
- are a customer and you are setting up an account with us
- are asked by an organisation to join its Gallery and you register with us to allow this
- add and manage your images on the pixevety platform
- pay us for your subscription to the pixevety platform
- ask us a question or make a complaint
- answer questions that we ask you (in order for us to assist you).

DATA QUALITY

We use only the required and appropriate personal information for a task, and ensure that it remains accurate, complete and up to date.

We take care not to use personal information for the sake of convenience and we do not use more than is necessary. Your account settings can help you keep your personal information, and your chosen privacy settings, up to date.

Some of the personal information we collect will rely on you to ensure its accuracy (e.g., account and payment-related information, and permissions or restrictions you place on your own images). We encourage you to review your account details to ensure they remain up to date, and to check your privacy settings regularly to ensure they continue to meet your needs.

Before we use your personal information (and particularly if some time has elapsed), we may need to double check with you to make sure it is accurate, complete and up to date. We also provide you with the ability to update your personal information directly through your My Account page.

USE & DISCLOSURE LIMITATION

We only use or disclose personal information for purpose we collected it unless the law permits or requires something elsez

When we collect your personal information, we give you a **collection notice** so you understand why we need the information. We will not use or disclose your personal information for anything else unless you have given your consent, or we are permitted or required by law.

We use and disclose your personal information to:

- verify your identity and other details you provide to us
- respond to a question you ask us about the **pix**evety platform
- send you information that you have asked for
- direct you to our FAQs and other resources
- investigate and respond to a complaint made by you.

We may also share elements of your personal information to the service providers who work with us in providing our services to you, including:

- contracted service providers (as set out in more detail in Security Safeguards)
- service providers who monitor and analyse the operation and security of the **pix**evety platform, or who provide administrative, technical and organisational services to our staff, and
- consultants and professional advisers.

If Pixevety Pty Ltd or its assets are acquired, or if we go through some other change of control affecting the **pix**evety platform, we may transfer your personal information to a third-party acquirer.

SECURITY SAFEGUARDS

We protect personal information using a range of physical, technical and administrative safeguards.

> The protection of your personal information is core to our business values. We apply appropriate security measures, layered across the different areas of our business, to provide a 'defence in depth' approach. These measures cover a range of functions to prevent loss, unauthorised access, use, disclosure, damage or destruction of your personal information.

We securely manage and dispose of personal information, whether it is held in hard copy or electronic format and whether it is stored on-site or in 'the cloud'.

We operate our business and our platform in accordance with detailed information security policies and procedures (which are compliant with the *International Standard (ISO) 27002* and relevant industry best practices). We also have measures in place to identify, respond to and prevent data breach events.

> Protection of your personal information from unauthorised access and disclosure is a priority for us. Any concerns should be reported to us without delay, by email to privacy@pixevety.com or telephone: 1300 438 389

Contracted service providers

We use contracted service providers to securely store personal information and to manage or enhance the functionality of the pixevety platform. Personal information is generally managed in a digital environment ('the cloud') by our service providers. It is a condition of our service agreements that we stay in control of what happens to the personal information they manage on our behalf *and* that it is kept secure.

Secure data storage

We store personal information within secure data-centres and back-up sites, being mindful of the requirements in some regions to manage personal information locally (on-shore) wherever possible.

Secure payments

We use a secure PCI DSS compliant payment provider for all of our fee-for-service transactions. Payments are made using a secure gateway, which can be accessed via the pixevety platform.

Functionalities

The pixevety platform gives you access to:

- user support
- image recognition and tagging (for object and location recognition), and
- facial recognition (to map your chosen privacy settings back to the images of you).

We presently use service providers who only store their data in Australia (for all US-based organisations, data is only stored in the United States) to provide the following functionalities:

- Image recognition: (e.g., object, colour, location) and tagging. **Please note**: The image recognition functionality can be turned off in your privacy settings if you wish.
- Facial recognition: Facial recognition is an algorithmic process. It is encrypted and specific to each Gallery. **Please note**: The facial recognition functionality is vital for ensuring that your privacy settings (permissions) are mapped to each and every one of your images. It cannot be turned off.

Where we engage service providers, they are not permitted to handle (manage, use, disclose or retain) personal information in any way that contravenes their service agreement with us. Further information about our contracted service providers can be found in the FAQs.

ACCESS AND AMENDMENT

We support your right to access and make corrections to the personal information we hold about you

We support your right to access, and make changes to, your own personal information without unreasonable expense or delay.

Access

With very limited exceptions, if we hold personal information about you, we are happy to tell you what it is and give it to you in an easily accessible format. We will not, however, tell someone else what personal information we hold about you (unless you permit us or there is a lawful ability or requirement for us to do so).

To assist you, we have a process for gaining access to the personal information held about you on the pixevety platform. Simply log in to your pixevety account and go to your My Account page and click on the **"Download My Data"** button.

Even if you don't have an account, you can make a request to us to confirm if we hold your personal information. Where we do, you can obtain your personal information from us free of charge, in a format that is easily accessible. If you are unable to use the "Download My Data" option, please contact us at privacy@pixevety.com for help.

Making changes

You are able to update the personal information relating to your account with us at any time by visiting your My Account page on the pixevety platform. If you are unable to make the changes yourself using the pixevety platform, please contact us at privacy@pixevety.com for help.

Important note: When the pixevety platform is used by an organisation (such as a school or sporting club) to manage images, we are considered a service provider to that organisation. In such cases, you *may not* be able to access or change particular types of personal information directly via the pixevety platform (e.g., you will be unable to change a unique ID number given to you by the organisation). In such cases, please contact the organisation directly with your request.

ACCOUNTABILITY

We will regularly review our personal information management practices. If we receive a privacy complaint, we will manage it in a timely manner.

The pixevety ethos is about building privacy into every facet of our business, from our corporate processes to the operation of our platform.

We routinely review the operation of the pixevety platform and incorporate privacy best-practice into new iterations (or versions). Where required (such as for the completion of Privacy Impact Assessments) we engage the services of independent privacy experts.

We promote and maintain a strong privacy culture. Our staff attend training and targeted briefings in relation to privacy, and we regularly review and maintain our privacy processes and corporate privacy (and security) documentation. We use a well-regarded privacy platform, OneTrust, to assist with our privacy related workflows. If you have a concern about our privacy practices, we want to hear from you. You are welcome to ask questions, and it is your right to complain if you feel our practices are in breach of the privacy law that applies in your region.

We take our role in protecting your privacy seriously. If you have a complaint about a breach of privacy, please contact us by email to privacy@pixevety.com or telephone: 1300 438 389.

Privacy where YOU are

We have shared above what we do about privacy no matter where in the world we are. Sometimes a region requires us to write all this down in a specific way, in a privacy policy or similar kind of document. Details about how we comply with privacy requirements **in your region** – including specific details required by your region – can be found in Our Policies.

OUR POLICIES

Asia Pacific

Privacy Policy - Australia

Privacy Policy - NZ

Privacy Policy - Singapore

United States

Privacy Policy - California

Our Children's Online Privacy Statement