

Privacy Policy

Advoc8 GRM Pty Ltd

1. We respect your privacy

Advoc8 GRM Pty Ltd ACN 613 405 262 (“Advoc8”, “we”, “us” or “our”) respects your right to privacy and is committed to safeguarding the privacy of our customers and website visitors. This privacy policy sets out how we collect and treat your personal information.

By accessing and using our Website, you acknowledge that you have read and understood this privacy policy.

You should also review our Website terms and conditions:

http://public.advoc8.co/documents/terms_and_conditions/Advoc8+GRM+Terms+%26+Conditions.pdf

"Personal information" is information we hold which is identified, or reasonably identifiable, as being about you.

2. How we collect your personal information

2.1. We collect personal information for the purpose of conducting our business as a provider of advocacy software, tools and related tools and services (collectively, our **Services**). We collect your information in ways including when you:

- access and use our Website and/or our Services, including interacting with us on social media;
- change your content or email preferences;
- contact or interact with us and provide personal information by any other means, including physically or electronically.

2.2. We may also collect personal information about you indirectly from third parties or other sources, where reasonably necessary for the purposes set out in section 5, including:

- where your organisation subscribes to our Services and provides your contact details for the purposes of the subscription;
- where we add our details to our tool based on public sources such as government directories, departmental websites, LinkedIn profiles and media articles, and our direct enquiries;
- where subscribers and their personnel add your details to our tool. In this case, we ask our subscribers to ensure that they comply with applicable laws in handling your information.

More information about how we collect and use information in our tool is set out in section 3 of this privacy policy.

- 2.3. We may combine information that we collect directly from you with information obtained from third parties or other sources, where permitted by applicable laws.
- 2.4. If you provide personal information of third parties to us, you must inform the third party about our privacy policy and your provision of their personal information to us. You are responsible for ensuring that you comply with any obligations under applicable data protection laws in relation to such disclosure, including, where required, providing the appropriate notices and obtaining the appropriate consents.

3. Our advocacy tool

- 3.1. The Advoc8 Core service allows subscribers and their personnel to access a tool with current information about political and governmental stakeholders that facilitates campaign management and records of stakeholder relationships. More information about how the Advoc8 Core service works is set out on our Website.
- 3.2. Users of our Services may have access to personal information about stakeholders in the tool and may add information to their accounts that they have collected. Users may also receive alerts of updates to personal information in the tool, such as changes to contact information for stakeholders.
- 3.3. Users may opt to contact individuals whose information is included in the tool. We do not control and are not responsible for the content of those communications.
- 3.4. Stakeholders whose information is on the tool always have the opportunity to review and request changes to the information by **contacting us at dpo@advoc8.co**.
- 3.5. If we receive a request from a stakeholder to delete their personal information from our tool, we will make that information inaccessible to users. So that the information will not become accessible to users again, we will retain a log of the request including the stakeholder's name, organisation and the contact details the stakeholder provided to us. This log will not be visible to users.
- 3.6. If the stakeholder requests that we do not retain any of their personal information, we will delete the information from our database and retain a log, your data is prevented from being added to the tool again in the future.
- 3.7. Our staff receive training in our data protection policies.
- 3.8. We are constantly checking and updating the information in our tool to ensure it is accurate and up to date. If an individual leaves the government sector, we will do our best to remove them from our stakeholder database on becoming aware of this.

4. Types of personal information we collect

- 4.1. The personal information that we collect may include:
 - your name and contact details, including phone number, email address, residential address, or mailing address;
 - how you use our Services;

- your payment details;
 - information about your role as a political or government stakeholder, which may include information about your job title, career history, awards and achievements, contact details and reporting lines, as well as sensitive information such as your political, religious or trade union affiliations;
 - any other personal information collected in the course of using our Services or completing a transaction.
- 4.2. You have the right not to provide your personal information to us. You may not be able to use our Services, or some features of our Services, if you choose not to provide this information.

5. How we use your personal information

- 5.1. We collect, hold, and use your personal information to provide our Services to subscribers, to improve our Services, maintain and develop our business systems and assist in responding to your feedback or enquiries.
- 5.2. We may also contact you to make you aware of new and additional products, services and opportunities available to you, or to ask if you would like to participate in our research.
- 5.3. We may contact you by a variety of measures including, but not limited to telephone, email, SMS or mail.
- 5.4. We also use your personal information to compare information for accuracy and to verify it with third parties.
- 5.5. We may monitor and record our communications with you, including e-mails and phone conversations. Information which we collect may then be used for training purposes, quality assurance, to record details about our website, applications and services you order from us or ask us about, and in order to meet our legal and regulatory obligations generally.
- 5.6. We may collect, hold, use, and disclose your personal information for other purposes which are within reasonable expectations or permitted or required by law.
- 5.7. You may at any time opt-out of receiving marketing material by **contacting us at dpo@advoc8.co** or by following the unsubscribe instructions on any marketing communication you receive from us. Removal from any marketing distribution lists may take several business days following the date of your request.
- 5.8. To the extent permitted by applicable law, we retain information about you after the end of your subscription period for our Services. This information will be held and used for as long as permitted for legal, regulatory, fraud prevention and legitimate business purposes.
- 5.9. When your personal information is no longer required by us, unless we are required by law to retain it, we will take reasonable steps to destroy or de-identity your personal information securely.

6. When we disclose your personal information

- 6.1. We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors as reasonably necessary for the purposes set out in this policy.
- 6.2. 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.
- 6.3. We may also use your personal information to protect our Website, our intellectual property, and our property or safety or that of our customers or third parties.
- 6.4. Information that we collect may from time to time be stored, processed in or transferred to or between parties located in countries outside Australia. This may include countries which do not provide the same level of protection as the laws of Australia. Where applicable, we will make any such international transfers subject to appropriate or suitable safeguards as required by the General Data Protection Regulation (EU) 2016/679 or other relevant laws. This may include entering into the EU standard Contractual Clauses which are available here https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en. You may contact us at any time using the contact details below if you would like further information on these safeguards.
- 6.5. We may also disclose or transfer our tools, including personal information, to purchasers or potential purchasers of our business or its assets.
- 6.6. Where we disclose your personal information to third parties, we will request that the third party comply with applicable laws and, if appropriate, this privacy policy or their own appropriate compliance practices regarding handling your personal information.

7. Security of your personal information

- 7.1. We are committed to ensuring that the information you provide to us is secure. To minimise the risk of unauthorised access or disclosure, we have put in place physical, electronic and managerial procedures to safeguard and secure information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.
- 7.2. 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.

8. Access to your personal information

- 8.1. You can access and/or correct your personal information, subject to exceptions allowed by law. 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 dpo@advoc8.co**.

- 8.2. A small administrative fee may be payable for the provision of information.
- 8.3. We reserve the right to refuse to provide you with information that we hold about you, where permitted by applicable laws.

9. Complaints about privacy

- 9.1. If you have any complaints about our privacy practices, please feel free to send in details of your complaints to dpo@advoc8.co. We take complaints very seriously and will respond shortly after receiving written notice of your complaint.

10. Changes to privacy policy

- 10.1. Please be aware that we may change this privacy policy from time to time to address changes in laws, technology, our operations and practices. Changes will be effective when the updated version is made available on our Website. Please check back on our website from time to time to review our privacy policy.
- 10.2. If we are unable to satisfactorily resolve your concerns about our handling of your personal information, you can contact the Office of the Australian Information Commissioner:

GPO Box 5218
Sydney NSW 2001
Email: enquiries@oaic.gov.au
Tel: 1300 363 992
www.oaic.gov.au

11. Cookies and data

- 11.1. When you visit our Website we may collect certain information such as browser type, operating system, website visited immediately before coming to our site, etc. This information is used in an aggregated manner to analyse how people use our site, such that we can improve our service.
- 11.2. In order to improve your experience on our Website, and for the purposes of marketing our services on other websites you may visit, we may from time to time use cookies on our Website. Cookies are very small files which a website uses to identify you when you come back to the site and to store details about your use of the site. Cookies are not malicious programs that access or damage your computer. You may disable the use of cookies via your Internet browser settings, but this may prevent you from taking full advantage of our Website.
- 11.3. Third party vendors, such as Google, show our marketing material on websites across the Internet, and use cookies to serve ads to you based on your past visits to our Website. You can opt out of Google's use of cookies by visiting Google's Ads Settings at <http://www.google.com/settings/ads>. Alternatively, you can opt out of a third-party vendor's use of cookies by visiting the Networking Advertising Initiative opt out page at <http://optout.networkadvertising.org/?c=1> or [AdChoices](#).
- 11.4. Our Website uses Google Analytics, a service that enables the tracking of user analytics including but not limited to browser information, operating system information,

pages viewed while browsing the Service, Website, and Apps session times and referring website addresses, and enables us to help understand traffic and usage of the Service. Information about you regarding your usage behaviour is held by Google and is subject to its privacy policy which can be viewed [here](#). Information about privacy issues relating to Google Analytics can be found here. https://support.google.com/analytics/topic/2919631?hl=en&ref_topic=1008008

11.5. We may also use the Google Ads service to enable remarketing services, and Google UserID, demographic and interest reports. Information about you regarding your web usage behaviour is held by Google. Information from Google's UserID service may be connected to other data that we hold about you.

11.6. Our Website may also use Facebook pixels for conversion tracking and custom audiences, in accordance with Facebook's terms which can be viewed here <https://www.facebook.com/customaudiences/app/tos/?ref=u2u>.

11.7. We may also use other third-party providers. You can opt out of a third-party vendor's use of cookies, or the collection and use of information for ad targeting, by visiting the [Network Advertising Initiative opt out page](#) or [AdChoices](#).

12. Third party sites

12.1. Our Website may from time to time have links to other websites not owned or controlled by us, which may have their own privacy policies. These links are meant for your convenience only. Links to third party websites do not constitute sponsorship or endorsement of these websites. Please be aware that we are not responsible for the privacy practices of other websites.

13. Contact Details

If you have any enquiries about this privacy policy, please contact our Data Privacy Officer Harry Curotta at dpo@advoc8.co

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