

BACKGROUND:

Peazie understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our clients and users and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the laws of Australia and the UK where we operate.

This notice relates to how we collect and use data from one of our own websites, not those that we build for our customers, which will be subject to the various notices outlined on those sites.

1. Information About Us

Peazie is comprised of two separate legal entities and has two office locations:

Peazie Social Media (Group) Pty Ltd, Level 2, 27 St Edmonds Road, Prahran VIC 3181. ACN: 153 421 008 (Peazie AU)

And

Peazie Ltd, 45 Weymouth Street, London W1G 8BY. Registered in England. Company Number: 10684457 (Peazie UK)

Together "Peazie" and, singly, Peazie Australia "Peazie AU" and Peazie United Kingdom "Peazie UK".

2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the laws of Australia and the UK relating to your personal data.

3. Which laws apply, and where?

Peazie adheres to all local regulations in Australia and in the UK. As the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") contains more stringent regulations in some areas than in Australia. Consequently, by complying with the GDPR, Australian requirements are also being met.

Peazie AU and Peazie UK have signed agreements in place to ensure that each company complies with the relevant regulations if data is exchanged between companies.

4. What is Personal Data?

Personal data is defined by the GDPR as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we might use is set out in Part 6, below.

5. **What Are My Rights?**

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 11 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personally identifiable data that we have. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that you can ask us for a copy of your personal data held by us to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way. Part 6 explains more about how we use your personal data.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with a local Information Commissioner's Office.

6. **What Personal Data Do You Collect?**

If you are entering one of our demonstration applications on one of our websites, then depending on the demonstration(s) you use, we may collect some or all of the following:

- Name;
- Date of birth;
- Gender;
- Company Name/Business Name;
- Address;
- Email address;
- Telephone number;
- Job title;
- Profession;

- Information about your preferences and interests;
- Social media addresses or handles;

If you are contacting us through a contact form on one of our websites, we may collect some or all of the following:

- Name;
- Company Name/Business Name;
- Email address;
- Telephone number;

The data we collect may vary according to your relationship with us.

7. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- Supplying our products and services to you. Your personal details are required in order for us to interact with you
- Personalising and tailoring our products and services for you.
- Communicating with you. This may include responding to emails or calls from you, or following up on an enquiry from you either as a result of a direct request or by use of our demonstration products by you online, (as long as you have explicitly given consent).
- Supplying you with information by email and/or post that you have opted-in to (you may unsubscribe or opt-out at any time by contacting us as explained in section 11).

With your permission and/or where permitted by law, we may also use your personal data for our own marketing purposes, which may include contacting you by email and/or telephone with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

8. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. This will normally be no longer than three years after our last mutual contact with each other.

9. **How and Where Do You Store or Transfer My Personal Data?**

Generally, data is stored on servers in Australia, The United Kingdom or (in the case of some data collected through Peazie campaigns launched before May 2018) in the USA.

We may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the “EEA” consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as “third countries” and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would under the GDPR. Peazie AU and Peazie UK have signed data exchange protocols in place between them to cover these matters.

10. **Do You Share My Personal Data?**

We will not share any of your personal data with any third parties for any purposes, subject to two important exceptions.

- 1) In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.
- 2) Peazie build, run and maintain competitions and promotions on behalf of our customers as well as for ourselves. When we undertake such activity for our customers, you will have entered a promotion, usually with our clients’ branding. Any personally identifiable information (PII) collected that way, is collected on their behalf and not for ourselves. In those cases, the PII is transferred to them, usually shortly after the end of a promotion. Our clients may require us to perform some analysis on the data collected on their behalf. When using Peazie services this way, you should normally contact the brand in question if you have any queries relating to your data, but you can also contact as shown in section 11 and we will do our best to help you or refer your query to our client.

11. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing by email and sent to hello@peazie.com

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding and subject to local laws.

We will respond to your subject access request in not more one month of receiving it. Normally, we will aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

12. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please contact us at hello@peazie.com

13. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection, or to cover matters more clearly than before. Such changes will be posted on our website.

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