



Welcome to a whole new world of learning...

CLUEY LEARNING PRIVACY STATEMENT

At Cluey Learning, we are committed to respecting the privacy of our customers and users in general. It's important that you feel secure whenever you deal with us. It's also important that you understand how we protect your privacy as well as how, when and where we may use your details.

Our Privacy Policy is designed to inform you about personal information we collect and handle about you as a customer, visitor to our www.ClueyLearning.com website ('Website'), a candidate or as someone who engages with us through social media, other digital services, correspondence or in person as a member of the public.

From time to time, we may make changes to this Privacy Policy so we encourage you to check back and review it regularly to ensure you are aware of current practices. This Privacy Policy applies to personal information collected, used, stored and disclosed in Australia (or overseas as disclosed in this Privacy Policy) by Cluey Learning.

In summary, this Privacy Policy explains:

- what personal information is collected about you;
- how we collect and use your personal information;
- your right of access to your personal information;
- your right to inspect and, where necessary, correct the personal information that we hold about you;
- your right to have your privacy complaints investigated and resolved; and
- your right to have your personal information protected from misuse or unauthorised access

WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT YOU?

Personal information is any information that can be used to identify an individual. This includes any personal information or opinions about you, whether true or not, no matter how the information or opinions are recorded and includes information from any source.

The nature of the personal information we collect about you is generally comprised of your name, mailing address, e-mail address, phone number, the company you represent, company address and is strictly limited to the information that you voluntarily provide to us (through our Website or by contacting us through any format).

If at any time you provide information about another person to us (i.e. an individual - for example, a candidate), you warrant that you are authorised to do so and that you will inform that person of who we are and that we will use and disclose their information as set out in this Privacy Policy.

If you provide incomplete or inaccurate information to us, we may not be able to provide you with the services you are seeking. We do not seek to collect nor store information about anyone's ethnic origins, political or religious beliefs, trade union membership, sexual preferences or criminal record. If you provide these and other types of sensitive information to us, then by doing so, you consent to our collection of that information and to the use and disclosure of that information as set out in this Privacy Policy.

If you are a candidate performing an online assessment test, personal information may also include information collected as part of your assessment being performed through Cluey Learning, such as career information, professional or trade qualifications, work history or references.

HOW DO WE COLLECT AND HOLD YOUR PERSONAL INFORMATION?

Where it is reasonable and practicable to do so, we collect your personal information directly from you when you register with us or sign on as a user (either as a customer or candidate), order assessments, correspond with us or provide feedback to us. We will record, collect and hold information in relation to your transactions with us. We may monitor and record your communications with us (including email and telephone) for security, dispute resolution and training purposes.

We hold personal information electronically and in hard copy form, both at our own premises and with the assistance of our service providers which may be located overseas. We implement a range of measures to protect the security of that personal information. We also take measures in respect of destroying or de-identifying personal information that is no longer needed for any lawful purpose.

We will reasonably ensure that personal information we collect, use or disclose is accurate, complete and up to date.

COOKIES

Our Website uses cookies to aggregate information about the pages that users visit so that we can update and redesign this Website, as necessary, in order to provide you with the most useful information. This will enable you to take full advantage of the services we offer.

A "cookie" is an identifier that we transfer to users' computer hard drives through users' web browsers to enable our systems to recognise users' browsers and interact more efficiently with users' computers.

You can generally configure your browser to accept or reject all cookies or notify you when a cookie is used. We suggest that you refer to your browser instructions or help screens to learn more about these functions, bearing in mind that if you configure your browser so as to not receive any cookies, a certain level of functionality of our Website may be lost.

WHY DO WE COLLECT YOUR PERSONAL INFORMATION?

If you are a customer, we will use and disclose information for the primary purpose for which it was collected. We collect and hold the personal information that you supply to us on our Website or through your contact with us to:

identify and contact you so that we can provide you with the information you have requested, assess and process any application you make for services, provide services to you and administer and manage services provided to you (including charging, billing and collecting debts);

gain an understanding of your information and communication needs in order for us to provide you with better, more personalised services that are tailored to your needs;

inform you of ways the services provided to you could be improved;

conduct appropriate checks for credit-worthiness and for fraud;

research and develop our services using third party services;

send you other information that we believe you would find interesting about Cluey Learning or the services you receive (direct marketing). You may opt out of any direct marketing service at any time;

perform our administrative operations, including accounting, risk management, record keeping, archiving, maintain and develop our business systems and infrastructure (including systems development, testing and upgrading), credit scoring and staff training; and

validate the user's rights to view the information provided. We also may use and hold personal information, which is provided to us in connection with services that you request,

for the purposes (as relevant) of:

- complying with legislative and regulatory requirements or as otherwise permitted or authorised by law;
- considering any other request for services you may make to us;
- conducting market or customer satisfaction research;
- developing, establishing and administering alliances and other arrangements with other organisations in relation to the promotion, administration and use of our respective products and services;
- developing and identifying products and services that may interest you; and
- for administrative and management purposes including without limitation, account management, data processing, data storage, provision of internet services and webhosting in Australia and overseas.

In addition, if you are a candidate and you have been enrolled to complete an assessment, we may collect personal information from you in order to:

- communicate with you to request you to complete the relevant assessment;
- provide your assessment report to the party who ordered it;
- communicate with you;
- understand the needs of our customers and applicants in order to continuously develop and improve our products and services;
- protect against fraud or other misuse or loss of data; and
- ensure your security when visiting our Website and learn which areas of the Website are of most interest to you (see the section 'Cookies').

In common with many other businesses, we use agents and other third parties to conduct certain activities on our behalf and provide certain services to us. For this purpose, we may need to provide these third parties with your personal information. Where appropriate, these disclosures are subject to privacy and confidentiality protections.

Where we engage third party contractors to perform services for us, and there is a possibility of their handling of personal information we hold, we prohibit the third party contractor from using personal information about you except for the specific purpose for which we supply it.

The types of organisations to which we may disclose a customer's, consumer's or user's personal information include:

- financial institutions for the purpose of processing online payments and tracing transactions;
- our agents, contractors and external advisers whom we engage from time to time to carry out, or advise on, our functions and activities, including our accountants, auditors and lawyers;
- providers of other services to us;
- anyone supplying goods or services to you in connection with the services you requested;
- any person or organisation who introduces you to us;
- any person to the extent necessary, in our view, in order to carry out any instruction you give to us;
- regulatory bodies;
- debt collection agencies;
- organisations involved in managing our corporate risk and funding functions (e.g. securitisation);
- your and our insurers or prospective insurers and their underwriters;
- other organisations including our related bodies corporate (and our agents and their agents) and organisations with whom we have arrangements for the purpose of promoting our respective products and services; and
- for administrative and management purposes including without limitation, account management, data processing, data storage, provision of internet services and webhosting;

any of whom may be located overseas. Where such disclosure occurs, we will require these third parties to keep your information confidential and use it only for the purposes

for which we are permitted to use it in accordance with the principles set out in this Privacy Policy.

DIRECT MARKETING

By accepting and using our services as a customer or a candidate you expressly permit us to use your personal information for direct marketing purposes. You agree that we may collect information about you from, and disclose it to, third party organisations including our related bodies corporate (and our agents and their agents) for the marketing of products and services.

You consent to the use of your information to issue product and professional mail outs by email, fax, social media or letters and undertaking other marketing or service based activities. You may opt out of any direct marketing service at any time.

COMMERCIAL ELECTRONIC MESSAGES

Cluey Learning may use any electronic addresses you have provided to us or for which you are the relevant electronic account holder (both "your addresses") to send you commercial electronic messages in order to provide you with information and to tell you about products and services, including those of third parties, which we consider may be of interest to you. You warrant that you have authority either as or on behalf of the relevant electronic account holder to provide this consent.

You agree that until you provide written notice or use an unsubscribe facility included with a commercial electronic message to withdraw your consent, we may continue to send commercial electronic messages to your addresses.

WE USE APPROPRIATE SECURITY SAFEGUARDS

At Cluey Learning, security is a priority. We employ appropriate measures to protect personal information against unauthorised access, disclosure, alteration or destruction. These may include, among others, encryption, physical access security and other appropriate technologies. We continually review and enhance our security systems as necessary.

CROSS BORDER

We may share your personal information with our suppliers, agents and third parties around the world. We may also use cloud computing or other technologies from time to time and your information may be stored outside Australia. Where we disclose your information to an entity overseas, we will comply with the Privacy Act and the Australian Privacy Principles in doing so.

ACCESS TO YOUR PERSONAL INFORMATION

Subject to the provisions of the Privacy Act 1988 (Cth), you may request that we provide you with access to the personal information we hold about you and we will provide you with such access where possible. If you require access to your personal information maintained by Cluey Learning, please contact our Privacy Officer. In the event that we are unwilling to provide you with such access, we will provide you with the reasons for our decision.

We take all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date. However, the accuracy of the information we hold depends to a large extent on the information you provide. That's why we recommend you:

let us know if there are any errors in your personal information; and
keep us up to date with changes to your personal information such as your name or other

details.

You may correct factual errors in your personally identifiable information by sending us a written request that credibly shows error. We reserve the right to independently verify any such claims made. To protect your privacy and security, we will also take reasonable steps to verify your identity before making corrections, including obtaining proof of identity. In the event that we are unwilling to correct personal information, we will provide you with the reasons for our decision.

We will take all reasonable steps to provide you with access to the information requested within 14 days of your request. In situations where the request is complicated or requires access to a large volume of information, we will provide access to the information requested within 30 days.

If you wish to access information or to lodge a complaint about your information, please put your request or complaint in writing and send it to:

Privacy Officer

Cluey Learning

Level 8, 51 Pitt Street, Sydney 2000

or send an email to: support@clueylearning.com

If the matter is not resolved to your satisfaction you can then refer your complaint to the Office of the Australian Information Commissioner who can be contacted through the following website:

<https://www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint>