

## OUR COMMITMENT

Your privacy is important to us. This document explains how Revelian Pty Ltd (ABN 58 089 022 202) of 1/21 Windorah St, Stafford QLD 4053 collects, handles, uses and discloses your personal information collected through your use of any of the Revelian Services (**Revelian Privacy Policy**).

Our information handling practices are continually reviewed to ensure they comply with local legislation including the Australian *Privacy Act 1988*, the EU *Data Protection Directive* and the United Kingdom's *Data Protection Act 1998* (as amended).

For the purpose of the [Data Protection Act 1998](#), the data controller is Revelian Pty Ltd of 1/21 Windorah St, Stafford QLD 4053.

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## 1 Definitions

1.1 In the Revelian Privacy Policy:

- (a) **"Client"** means the client named in a Client Agreement. In the case of some Revelian Services, including Revelian Express and Revelian Personal Insight Profile, the Client may also be the Participant.
- (b) **"Client Agreement"** means the agreement between Revelian and a Client to provide the Revelian Service.
- (c) **"Revelian Assessments"** means any of the professionally developed assessments designed specifically to identify or track various attitudes, traits, abilities, behaviours, preferences and likely actions, including (but not limited to) assessments based on psychometric assessments, surveys or analysis of other data.
- (d) **"Revelian Results"** means the feedback, information and reports provided by a Revelian Service.
- (e) **"Revelian Services"** means the services offered by Revelian from time to time, including but not limited to video interviewing, talent management, online surveys, data submission, database enquiries and responses, Revelian Assessments, profiling input, skills tests and the provision of reporting of results, and any feedback or other interaction between an individual and Revelian in the use of any of those services and includes services that are integrated with goods or services of a third party.
- (f) **"Revelian"** means Revelian Pty Ltd ACN 089 022 202.
- (g) **"Revelian Website"** means the website located at addresses [www.revelian.com.au](http://www.revelian.com.au); [www.revelian.com](http://www.revelian.com); [www.revelian.co.uk](http://www.revelian.co.uk); [app.revelian.com](http://app.revelian.com); [login.revelian.com](http://login.revelian.com); [www.onetest.com.au](http://www.onetest.com.au); [www.onetest.com](http://www.onetest.com); [www.onetest.co.uk](http://www.onetest.co.uk); [www.onetest.co.nz](http://www.onetest.co.nz) and such other domains as advised from time to time.
- (h) **"Participant"** means an individual (an applicant, candidate, a jobseeker, an employee, a self-initiated participant, current, prospective or future employee or a non-employee of the Client) who, as part of a Participant agreement, agrees to participate in an activity in connection with a Revelian Service. In the case of some Revelian Services, the Participant may also be the Client.
- (i) **"User"** means an individual who accesses or uses a Revelian Service or a Revelian website in any capacity, including whether as an actual or prospective Participant, Client, authorised representatives of a Client or a third party.

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## 2 INFORMATION COLLECTION

2.1 Revelian is the owner of all information collected by or through use of or access to any of the Revelian Services and any Revelian Website. We will not sell, share, or rent this information to others in ways different from what is disclosed in this Policy. Revelian collects information at several different points during the use of or access to Revelian Services or a Revelian website and in several different ways including:

- (a) Direct input by you - In order to register with the Revelian Website and to use Revelian Services you are required to provide certain personal information. Information we may collect includes your name, address, date of birth, telephone number, email address, mother's maiden name and, depending on the Revelian Services you use, your financial and credit card information, photographs and video footage featuring you and any information you provide when undertaking Revelian Assessments. If you do not provide certain information, you will not be able to use or complete the Revelian Services or any Revelian Results may not be able to be generated. This information is clearly identified at the point of collection. Other personal information that is requested is optional (but encouraged so we can provide a more personalised experience for you.).
- (b) Submission by Clients – Clients provide information, including personal information that Clients hold and are authorised or entitled to disclose, directly to Revelian, verbally and in hard copy and electronic records or documents, whether stored in or provided by way of digital storage media, electronic communications, including through a computer, communications interface or *application program interface (API)* available over or through a Secure Sockets Layer (**SSL**) protocol.
- (c) Submission by or collection from third parties – Revelian may request third parties to provide or allow Revelian access to and collection of information, including personal information that the third parties hold and are authorised or entitled to disclose, directly to Revelian, verbally and in hard copy and electronic records or documents, whether stored in or provided by way of digital storage media, electronic communications, including through a computer, communications interface or API available over a SSL protocol.
- (d) Cookies - Cookies are small text files that are placed on your computer by websites that you visit, or certain emails you open (including websites accessed or emails received in connection with Revelian Services). Cookies are used by Revelian and third parties that provide services to Revelian in relation to the Revelian Website and electronic marketing in

order to make our websites and electronic communications work, or work more efficiently, as well as to provide business and marketing information to Revelian. Use of a cookie is in no way linked to any personal information.

- (e) More information about the cookies (including third party cookies) that are used whilst you are visiting this and any other Revelian Website is available here <http://www.revelian.com/cookies>
- (f) Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage them please go to <http://www.allaboutcookies.org/>
- (g) Correspondence with us – We collect personal information such as your name, telephone number and email address (and any other information you volunteer) when you correspond with us by telephone, email, our online enquiries forms or otherwise.
- (h) Log files - We use IP address and other non-personal internet connection log details to analyse trends, administer Revelian Services and gather information for use in delivering and improving and extending our services. To ensure the integrity of the data submitted by you we log information about sessions including IP address, number of login attempts, times of commencement and conclusion and the responses submitted.
- (i) Publicly available personal information – We may source information, including personal information, from publicly available information sources.
- (j) Surveys and promotional offers - We may request information via surveys or promotional offers. Participation in these surveys or promotional offers is voluntary. Information requested may include contact information (such as name and address), and demographic information (such as post code, age). Contact information will only be used to communicate with those who have opted to receive these offers. Aggregated survey information will be used for monitoring or improving the use and satisfaction of Users.
- (k) Newsletter - If you wish to subscribe (opt in) to one or more of our newsletters, we ask for contact information including name and email or postal address. All newsletters provide the recipient with the ability to discontinue (opt out of) the service at any time.
- (l) Credit card information from Users – If you establish a credit account with us or place an order for Revelian Services, we request certain personal information from you in connection with the order, including contact information such as name, email, and postal address and financial information including credit or debit card number, CCV number and credit or debit card expiration date ("**financial information**"). We use this financial information to invoice and charge you for the use of services, as well as to verify your contact information. When financial information is collected, it passes through our bank (and for transactions outside Australia, correspondent banks that may be used by our bank in respect of foreign currency transactions) for processing. We never

permanently store a complete record of the financial information but may retain and use some parts of that financial information (but never a credit or debit card number) as part of maintaining a record of transaction history and for account and service verification, fraud prevention and management, audit, complaints handling and dispute resolution purposes.

- (m) All data is stored and processed on third party secure servers certified to comply with ISO27001:2013 "*Information technology — Security techniques — Information security management systems — Requirements*" which is the international standard for managing risks to security of information. Financial information is processed by payment providers compliant with PCI-DSS (Payment Card Industry – Data Security Standard). The transmission of information is not completely secure. Although we endeavour to protect your personal information, we cannot guarantee the security of your personal information transmitted to a Revelian Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on a Revelian Website).

We will only use fair and lawful ways to collect personal information. Sometimes we may need to collect information from third parties. However, we will collect personal information directly from you if it is reasonable and practicable to do so.

The Revelian Services are not intended for children under 13 years of age. No one under age 13 may provide any information to us in connection with the Revelian Services. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on any Revelian Website or in connection with a Revelian Service or otherwise provide any information about yourself, including your name, address, telephone number or e-mail address. If we learn that we have collected or received personal information from a child under 13 without verification of parental consent, we will delete such information. If you believe we might have any information from or about a child under 13, please contact us at [privacy@revelian.com](mailto:privacy@revelian.com).

### 3 INFORMATION USE AND DISCLOSURE

**3.1 Personal information** - Revelian may use and disclose your personal information (in whole or in part, and in identifiable and de-identifiable formats) in order to provide any Revelian Services (including Revelian Assessments, and Revelian Results (including summaries of Revelian Results), confirmation of personal information held and the fact that a Revelian Assessment has been undertaken) to Clients, or in relation to any service that is ancillary or necessary to those services, including administration, management, account management, verification and auditing of services and the Revelian business, Client and Participant engagement, complaints handling, dispute resolution, product and services improvement and development and service support and for marketing (of Revelian services and products in accordance with clauses 3.13 to 3.15), developmental, research, statistical, analytical, validation and archival purposes, or for any other purpose disclosed by us when you provide the information (**Purpose**). We may also disclose your personal information to comply with any court order, law or legal process, including to respond to any government or regulatory request. By participating in

- any Revelian Service, you agree to the terms of this privacy policy.
- 3.2 For any statistical or other analysis or similar research we will only use de-identified information.
  - 3.3 Revelian may use personal information that you give us or we collect from you to notify you about changes to our services.
  - 3.4 Revelian retains and uses all data that is collected during or as a result of any of the Revelian Services (other than data from a cookie as a result of a visit to or use of a Revelian Website) in order to maintain and improve the Revelian Services and to validate the integrity, accuracy and consistency of actions, values, methods, measures, principles, expectations, and outcomes underpinning Revelian Services, and as part of the normative data used in assessing Revelian Assessments and providing Revelian Results. This requirement is continuous and ongoing and means that this data is always retained and able to be used by Revelian (even if the Participant profile is deleted).
  - 3.5 **Disclosure to third parties** - We will only disclose your personal information to third parties for a Purpose or as set out in the further provisions of this clause 3 and with whom we have entered into an agreement that gives you (or that the law requires to give you) at least the same level of protection to your personal information as Revelian does.
  - 3.6 Revelian may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006 (or any equivalent legislation in any other relevant jurisdiction).
  - 3.7 Revelian may share your personal information with third party business partners, suppliers and sub-contractors for the performance of any contract we enter with you or a Client. Such third parties may, for example, include other providers of psychometric testing.
  - 3.8 Revelian may share your personal information with analytics and search engine providers that assist us in the improvement and optimisation of the Revelian Website.
  - 3.9 In the event that Revelian sells or buys any business or assets, we may disclose your personal information to the prospective seller or buyer of such business or assets.
  - 3.10 Revelian may disclose your personal information to law enforcement or other governmental agencies if we are under a duty to do so in order to comply with any legal or regulatory obligation.
  - 3.11 Revelian may disclose your personal information to third parties if reasonably necessary to enforce or apply our terms and conditions and other agreements, or to protect the rights, property, or safety of Revelian, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
  - 3.12 Revelian may enter into agreements with third parties to whom disclosures may be made who are located outside the country where the information was collected. If this occurs Revelian will update this privacy policy to provide information, as required by law, about the location of actual or likely recipients of any personal information held and disclosed by Revelian.

- 3.13 **Direct marketing** – You consent to Revelian using your personal information for the purposes of direct marketing of Revelian products and services, unless you have requested to opt-out of any direct marketing communications. Revelian does not sell your personal information to third parties for marketing purposes but it does engage third-party agencies to undertake marketing on Revelian's behalf, in which case Revelian will disclose your personal information to such third parties solely for the purposes of marketing Revelian products and services. Such parties are under an obligation to use your information only in accordance with our instructions and for the purpose of complying with their obligations to us.
- 3.14 If you are a UK individual, we will only send you marketing communications by email or SMS if we have obtained your consent to do so.

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#### 4 In any direct marketing campaign undertaken by or on behalf of Revelian, Revelian will provide a method for you to opt-out of such marketing (if you have not already done so). If you wish to opt-out or you wish to no longer receive direct marketing communications please contact Revelian at [privacy@revelian.com](mailto:privacy@revelian.com).

##### INFORMATION ACCESS

- 4.1 On written request (and subject to verification of your identity), we will give you access to the personal information we hold about you. If any personal information we hold about you is out of date or inaccurate, we encourage you to let us know, and ask us to correct it. If we cannot accommodate your request, you will receive our reasons in writing.
- 4.2 If you are a UK individual, you also have a legal right under the Data Protection Act 1998 to access information we hold about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.
- 4.3 We will make available to you a copy of the Revelian Privacy Policy free of charge and in the most appropriate form. If you require a copy of the amended Revelian Privacy Policy, other than as provided on the Revelian Website, please contact Revelian at [privacy@revelian.com](mailto:privacy@revelian.com). Revelian will use its reasonable efforts to provide you with a copy of the Revelian Privacy Policy in the form requested by you.
- 4.4 California Civil Code Section § 1798.83 permits Revelian Website users that are residents of California, United States to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to [privacy@revelian.com](mailto:privacy@revelian.com) or write us at: GPO Box 2916, Brisbane QLD 4001, Australia.

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#### 5 LINKS

- 5.1 The Revelian Services that are offered online may contain links to other sites. Please be aware that Revelian is not responsible for the privacy or data handling practices of any other sites and we strongly advise you to check their terms and policies before you submit your personal information to any third party site.
- 5.2 If you follow a link to any website outside the Revelian Website, you should be aware that such websites have their own privacy policies and the operators of those websites will handle your information in accordance with such policies and not with this Privacy Policy. For example, such operators might

contact you or permit third parties to contact you for marketing purposes in accordance with their own privacy policies, unless you opt out of such communications. You are also solely responsible for any transactions that you enter into with such third parties and it is your responsibility to satisfy yourself as to the quality and suitability of the product or service being offered to you and the specific terms of their sale. We do not accept any responsibility or liability for third party products or services.

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## 6 DATA SECURITY

- 6.1 The information that we collect from you is stored on the secure servers of our web services provider.
- 6.2 If you are located in the United Kingdom, please be aware that your personal information may also be transferred to, and stored at, other destinations outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services.
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- 7 **By submitting your personal information, you agree to the transfer, storing and processing of your personal information outside the EEA as set out in this Privacy Policy.**
- 7.1 We will take reasonable steps to ensure the personal information that Revelian collects, holds, uses or discloses is accurate, complete and up-to-date. We recommend you notify us if you change your address or contact details as soon as possible. This will help us to maintain your privacy by ensuring that any communications are sent to the correct postal address, email address, or telephone number. This can usually be done online or by contacting Revelian at [privacy@revelian.com](mailto:privacy@revelian.com)
- 7.2 We have in place a level of security appropriate to the nature of the data and the harm that might result from a breach of security. Unfortunately, however, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of information transmitted to our site; any transmission is at your own risk. Once we have received your personal information, we will take reasonable steps to protect it from misuse, loss and unauthorised access, modification or disclosure. We will also take reasonable steps to destroy or permanently de-identify personal information if we no longer need it for any purpose.
- 7.3 If you enter financial information on a Revelian Website, that information is encrypted using SSL technology. When financial information is collected, it passes through to our bank (and for transactions outside Australia, correspondent banks that may be used by our bank in respect of foreign currency transactions) for processing. We never permanently store complete financial information details.
- 7.4 For all online payments we use a third party payment gateway that is compliant with the PCI Security Standards Council *PCI Data Security Standard (PCI-DSS)*. The PCI-DSS provides a framework for a robust payment card data security process. All online payment transactions performed through a Revelian

Website using this payment gateway are secured payments.

- 7.5 If you have any questions about the security at our website, we invite you to contact us at [privacy@revelian.com](mailto:privacy@revelian.com).

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## 8 NOTIFICATION OF CHANGES

- 8.1 We reserve the right to amend the Revelian Privacy Policy at any time in accordance with the law. Notice of any amendment will be posted on the homepage of each Revelian Website and the amended Revelian Privacy Policy will be posted on the "Legals" page of each Revelian Website. If at any point we decide to use personal information in a manner different from that stated at the time it was collected, we will notify you by way of email (or as otherwise directed by you). You will have a choice as to whether or not we use your information in this different manner. We will only use information in accordance with the Revelian Privacy Policy under which the information was collected.
- 8.2 If you wish to be notified of any changes other than by email please provide your preferred contact details and Revelian will endeavour to respond to your request.

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## 9 Please visit our site regularly to check for any updates of the Revelian Privacy Policy. COMPLAINTS AND REVELIAN PRIVACY POLICY CONTACT DETAILS

Revelian contact details:

Address: GPO Box 2916  
Brisbane QLD 4001 Australia.  
Email: [privacy@revelian.com](mailto:privacy@revelian.com)  
Telephone - 1300 137 937 in Australia  
0800 046 9690 in the UK,  
or  
+ 61 7 3552 5711 from outside  
Australia or the UK.

If you feel that we are not complying with this Privacy Policy, please contact us at [privacy@revelian.com](mailto:privacy@revelian.com)

We will do our best to resolve your complaint as quickly as possible. If you are not satisfied with our response to your complaint, you can refer the matter to the relevant privacy regulator. More information about each regulator, the complaints process and how to lodge a complaint is available here

**Australia:**

**Australian Government:**

<http://www.oaic.gov.au/about-us/contact-us-page>

**Office of the Australian Information Commissioner**

Ph: 1300 363 992

E: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

F: +61 2 9284 9666

Level 3, 175 Pitt St Sydney NSW 2000

GPO Box 5218 Sydney NSW 2001

**United Kingdom:**

[https://ico.org.uk/Global/contact\\_us](https://ico.org.uk/Global/contact_us)

**Information Commissioner's Office**

Ph: 01625 545 745

E: [casework@ico.org.uk](mailto:casework@ico.org.uk)

F: 01625 524 510

Wycliffe House, Water Lane Cheshire SK9 5AF