

REVELIAN

Revelian Privacy Policy (Effective from September 2020; Last Reviewed September 2020)

1. Respecting your privacy

We are committed to compliance with privacy laws which apply to our businesses and which set out standards for the management of personal information. This policy outlines our personal information management practices applying to the personal information of individuals in respect of their dealings with Revelian or interaction with a Revelian online site, specifically:

- the kinds of personal information we collect and hold;
- how we collect and hold it;
- the purposes for which we collect, hold, use and disclose it;
- your right to access and seek correction of it;
- how you may complain about privacy matters; and
- our sharing of your personal information overseas.

There are some matters to which this policy does not apply. These are referred to below.

Before using our website, you are required to give specific consent to the processing of your personal data for the purposes set out in section 5 below, which you have done by ticking the data processing consent box on our website.

If you are located in the European Union (**EU**), you have additional rights under the *General Data Protection Regulation (GDPR)*. Details of those additional rights and how you may exercise them are set out at the end of our Privacy Policy. To make use of your data privacy rights, please visit: <https://www.revelian.com/legals/>.

If you are located in California, you have additional rights under the *California Consumer Privacy Act of 2018 (CCPA)* and unless stated otherwise and where appropriate, any terms defined in the CCPA have the same meaning when used in this policy. Details of those additional rights and how you may exercise them are set out at the end of our Privacy Policy.

For all others:

Should you wish to withdraw your consent to our processing your personal data or assert your rights under the CCPA, please contact our Privacy Officer, at: privacy@revelian.com. Revelian's Data Subject Consent Withdrawal Form can be accessed at: <https://www.revelian.com/legals/>.

Please note that the Revelian Privacy Policy should be read in conjunction with other terms we may have agreed with you and with terms and policies available via links from <https://www.revelian.com/legals/> such as:

- Revelian's Terms and Conditions
- Revelian Participant User Agreement
- Revelian's Acceptable Use Policy
- Revelian's Cookies Policy

2. Who are we?

In this policy, 'we' and 'Revelian' are, individually and collectively, Revelian Pty Ltd ABN 58 089 022 202 and its related bodies corporate.

For the purposes of the EU GDPR, the data processor is Revelian Pty Ltd of PO Box 1036, Stafford, Queensland, 4053, Australia.

Revelian Pty Ltd is a company located outside of the European Union. In order to comply with Art 27 of the GDPR, GDPR-Rep.eu has been nominated as our representative in the European Union.

*Contact GDPR-Rep.eu GDPR-Rep.eu
Maetzler Rechtsanwalts GmbH & Co KG Attorneys at Law
c/o Revelian Pty Ltd
Schellinggasse 3/10, 1010 Vienna, Austria
Please add the following subject to all correspondence: GDPR-REP ID: 14194955*

3. What kinds of personal information do we collect and hold?

The personal information we collect and hold is what we consider reasonably necessary for our business functions and activities.

When we collect and hold personal information, it is generally of the kind we ask for directly from you to provide our services and what arises from those services, and includes your first name, surname, email address, phone numbers, date of birth, mother's maiden name and place of birth. We may also ask several optional demographic questions that are used to assist us with anonymous internal research and development purposes. That information includes gender, English language proficiency, ethnicity, primary language, year of birth, highest level of education attained, experience using computers, comfort level when using computers and comfort level in completing assessments. It will also extend to other personal information you make available to us indirectly and to our assessments of your attitudes, traits, abilities, behaviours, preferences and likely actions. We may also collect other types of information indirectly from you including your IP address for assessment integrity purposes. Third party sources include social media sites such as LinkedIn and Facebook, and search engines such as Google.

You have the option of not identifying yourself or of using a pseudonym when dealing with us, except where this is impractical or where the law or a court order provides otherwise. Given our assessments are a personalised product, and that users cannot complete a Revelian assessment twice within a twelve month period, it is not possible to participate in a Revelian assessment without identifying yourself. This is also essential to ensure fairness and equity across candidates and valid assessments results being produced.

4. How do we collect and hold personal information?

Collection of personal information: When we collect personal information about you, we do so by making a record of it. We do this when:

- you communicate with us online, for example when you engage with us for the purpose of us making assessments of you;
- you request marketing materials such as whitepapers or subscribe to our newsletter;
- you take part in any trade promotions, testimonials, surveys or focus groups we are involved in conducting;
- you deal with us in other ways involving a need for personal information to be provided such as when you contact us.

The information you give us may include your name, address, e-mail address and phone number, mother's maiden name, day and month of birth and personal description. Regarding each of your visits to our site we will automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, device type and locale;
- information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page.

We may collect any phone number used to call our customer service number.

We may also collect personal information, for example your profession or country of residence, about you by accessing data from other sources and then analysing that data together with the information we already hold about you to learn more for the purpose of the services we may provide to you or to our clients about you. When you visit our websites, social media pages or mobile applications or click on our advertisements displayed on the online media of other companies, we may collect information about you using technology which is not apparent to you, for example "cookies". There is a lot of information available about how cookies work and how to change your browser's cookie preferences. For example, see 'All about cookies and your privacy'. For detailed information on the cookies we use and the purposes for which we use them, please see our Cookies Policy available via a link from www.revelian.com.

We may also collect personal information, for example qualifications and employment history, about you from third parties including current or potential employers of you in relation to a specific job application for which you are using our services.

Holding of personal information: Personal information we hold is generally stored in computer systems. These may be operated by us or by our service providers.

5. Why do we collect, hold, use and disclose personal information?

For all the personal information we collect, hold and use, we do so primarily to provide assessments pursuant to our services and present those assessments to those who have engaged us. We may use some of your personal information, for example the country you reside in, to market to you and to others and for incidental purposes. Not all the assessment information collected in respect of you is used for marketing and the majority of information is collected solely for the purpose of providing our assessment.

We disclose personal information we collect for a business purpose, and for incidental purposes. For example, we may disclose your personal information within our group, to service providers who assist us in our day-to-day business operations and as part of buying or selling businesses.

We may collect, hold, use and disclose your personal information for other purposes which are within reasonable expectations or where permitted by law. When marketing to you, your personal information is only ever used or disclosed for our own purposes. You may opt out of our direct marketing to you. Our direct marketing materials will tell you how to do this.

We may de-identify your personal information. We may do this for use and disclosure of the anonymous data for various data analytics purposes.

5.1 We use information held about you in the following ways:

- processing of an enquiry form completed by you;
- processing and reporting on an assessment completed by you, including disclosing the results of such assessment to a potential third party employer (which will be known to you) from whom you are utilising our services;
- processing a request expressing an interest in one or more of our products;
- providing your information to our marketing department who may contact you by post, telephone or email to request feedback and comments on our services or to provide information to you which may be of interest to you;
- providing your information to our agents and service providers for the purposes set out above;
- if applicable processing your application for employment and we shall retain a copy of your CV in case of suitable future opportunities.

5.2 We will use information you give us:

- to carry out our obligations arising from any contracts entered between you and us and to provide you with the information, products and services that you request from us;
- to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, you will be able to withdraw your consent by contacting our Privacy Officer at privacy@revelian.com.
- to notify you about changes to our service; and
- to ensure that content from our site is presented in the most effective manner for

you and for your computer.

5.3 We will use information we collect about you:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

5.4 Information we receive from other sources

We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

5.5 Disclosure of your information

You agree that we have the right to share your personal information for business purposes with:

- selected third parties including:
 - business partners, suppliers and sub-contractors for the performance of any contract we enter with them or you. This includes any businesses that engage us to undertake an assessment of you using our services (for example a potential employer of you);
 - advertisers and advertising networks that require the data to select and serve relevant adverts to you and others;
 - analytics and search engine providers that assist us in the improvement and optimisation of our site; and

When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We will disclose your personal information to third parties:

- If we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets;
- If Revelian or substantially all its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets;

and

- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use 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.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

We may disclose the following categories of personal information to third parties:

- De-identified assessment data, ie the results of assessments undertaken by you, which cannot be linked to your personal information by the third party.

In the course of collecting, holding, using or disclosing your personal data, we do not, nor intend to, sell your personal data to third parties.

6. Where we store your personal data

All information you provide to us is stored on our secure servers. Credit card information is not stored by Revelian as it is fully processed by a third party. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

7. How can you enquire about, access and correct your personal information?

Access: You are entitled to request access to any of your personal information we hold (and we will grant your access request except in limited circumstances recognised by law). We will respond to your access request within a reasonable time. If we do refuse your access request, we will provide with a written reason for our decision.

If you wish to access your personal information or have an enquiry about privacy, please contact our Privacy Officer at:

Privacy Officer
Revelian Pty Ltd ABN 58 089 022 202
PO Box 1036
STAFFORD QLD 4053 AUSTRALIA
Email: privacy@revelian.com

Telephone:
1300 137 937 in Australia
888 260 4639 in the USA, or
0800 046 9690 in the UK, or
+ 61 7 3552 5711 from outside Australia, USA or the UK.

Before we provide you with access to your personal information, we may require some proof of identity.

Correction: You are entitled to request the correction of your personal information. To make a correction request, please contact our Privacy Officer using the details above. We will respond to your correction request within a reasonable time. We may decline your correction request in certain circumstances. If we do refuse your correction request, we will provide you with a written reason for our decision and will include a statement with your personal information about the requested correction.

Retention and Deletion: Personal information will be retained by Revelian for 12 months, and will not be de-identified or deleted during such period. After 12 months, you may request de-identification, and if such a request is verifiable, such data will be de-identified where practicable but will be retained by Revelian. To request your personal information be deleted, please contact our Privacy Officer at one of the above contact points.

Please note that, to the extent permitted by law, Revelian will take steps to destroy or permanently de-identify personal information if it is no longer needed for any purpose under this Privacy Policy, except in circumstances where we are required or authorised to retain this personal information (including as a result of the operation of applicable law).

8. How can you complain about our management of personal information?

You have a right to make a privacy complaint. If you wish to complain about a breach of the privacy rules that bind us, you may contact our Privacy Officer at one of the above contact points. We may ask you to put your complaint in writing and to provide details about it. We may discuss your complaint with our personnel and our service providers and others as appropriate. We may also ask you to provide further information about your complaint and the outcome you are seeking.

Our Privacy Officer will investigate the matter and attempt to resolve it in a timely way. Our Privacy Officer will inform you in writing about the outcome of the investigation, usually within 30 days. If our Privacy Officer does not resolve your complaint to your satisfaction and no other complaint resolution procedures are agreed or required by law, you may refer your complaint to the relevant privacy regulator for further investigation.

Australian Residents: you have the right to complain to the Office of the Australian Information Commissioner (OAIC).

UK Residents: you have the right to complain to the UK Information Commissioner's Office (ICO).

Our sharing of your personal information overseas

Revelian's business is located in Australia and the majority of data we collect and process remains within Australia. We may allow your personal information to be shared outside Australia:

- Where data is securely parsed to trusted partners who are in the business of processing data to provide complimentary psychometric services. These services commonly involve diverse geographic locations which change from time to time for reasons which include data protection and processing efficiency. Only information essential to the accurate processing and reporting of assessment results is shared.

9. Individual Rights Under the EU GDPR

If you are located in the EU, you have the following additional rights (in addition to the rights outlined above):

- The right to information – you can request confirmation about the following: whether your

personal information is being processed by us; the purpose of processing; the categories of personal information which are processed; the recipients (or types of recipients) who may receive the personal information; the anticipated retention period of the personal information; and your rights to rectification, erasure, to restrict (or object) to processing and to lodge a complaint with a data protection supervisory authority in the EU.

- The right to object to our processing of your personal information for (i) direct marketing purposes; (ii) for scientific, historical research or statistical purposes; or (iii) where our processing is based on legitimate interest grounds or because it is in the public's interest. We will respond to your objection request within a month. However, there may be some circumstances where we are not required to stop processing your personal information. If this is the case, we will provide you with a written explanation.
- The right to restrict processing – in some circumstances, you can request us to restrict our use of your personal information in which case we will not use or disclose your personal information while it is restricted. We will respond to your restriction request within a month.
- The right to erasure – you can request us to erase your personal information where it is no longer required for a purpose for which it was collected or where, for example, you have exercised successfully your right to object to processing. We will respond to your erasure request within a month. However, where there are legal or other reasons for us to retain your personal information, we will provide you with a written explanation.
- The right to data portability – you can request us to provide you with a copy of the personal information you have provided to us. We are required to provide it to you in an electronic format that can be reused easily. You can also request us to transfer your personal information in an electronic format to another entity.

You can exercise any of these rights by contacting us using the contact details below.

You also have the right to:

- access your personal information and request the correction of your personal information (see section 7 above); and
- lodge a complaint with a data protection authority if you are unhappy with the outcome of a privacy complaint. Section 8 above explains our complaint handling process. A list of EU data protection authorities is available at <https://ec.europa.eu/>.

10. Individual Rights under the CCPA

If you are located in California, you have the following additional rights (in addition to the rights outlined above):

Under the CCPA, California residents have the right to request the following information from Revelian by emailing privacy@revelian.com. Revelian will provide such information for the past 12 months to you upon verification of your request:

- The categories of personal information Revelian collects about you;
- The categories of sources from which your personal information is collected;
- The business purpose for collecting your personal information;
- The categories of your personal information disclosed to third parties for a business purpose;
- The categories of third parties with whom Revelian shares your personal information; and

- The specific pieces of personal information Revelian has collected about you.

To make such a request, please send an email to privacy@revelian.com or write to us at:

Privacy Officer
Revelian Pty Ltd ABN 58 089 022 202
PO Box 1036
STAFFORD QLD 4053 AUSTRALIA

You are also permitted to designate an authorized agent to submit certain requests on your behalf. In order for an authorized agent to be verified, you must provide the authorized agent with signed, written permission to make such requests or a power of attorney. We may also follow up with you to verify your identity before processing the authorized agent's request.

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

11. Updates

This privacy policy is current at the date below. We may change it periodically. The most recent version of the policy is available at <https://www.revelian.com/legals/>

12. Other privacy terms and limits of this policy

This is a policy only. There may be additional privacy notices and terms relevant to you depending on the nature of your dealings with us. We have separate policies concerning our employees – this policy does not apply to the personal information of our employees in their capacity as such.

13. More information

Please contact our Privacy Officer with any questions about this privacy policy.

More information about privacy law and privacy principles is available from the privacy regulator.

- In Australia, the privacy regulator in Australia is the Privacy Commissioner: www.oaic.gov.au (email: enquiries@oaic.gov.au).
- In the UK, the privacy regulator is the Information Commissioner: www.ico.org.uk (email: casework@ico.org.uk)

*Last updated: **September 2020***