

ZAMBESI

PRIVACY POLICY

Effective October 2018

ZAMBESI PTY LTD ACN 618 653 437 (“Zambesi”, “we”, “our” and “us”) of Level 13, 333 George St Sydney NSW 2000, respects individual privacy and the rights of individuals to control their personal information. We are committed to protecting your personal information. This Privacy Policy sets out our policies and practices regarding the collection, use and disclosure of personal information that you provide to us and which we collect from you. By accessing or otherwise using the website at www.zambesi.com (“Zambesi”), contacting us by email, telephone, or using applications or websites owned or controlled by Zambesi, all products, software, data feeds, plugins, mobile applications and other applications and services provided from time to time on, from or through Zambesi (together, the “Service”), or engaging with us in any other way, you agree to the terms and conditions set out in this Privacy Policy and consent to the processing of your personal information in accordance with this Privacy Policy and any other arrangements that apply between us. You may withdraw your consent at any time by contacting us at hello@zambesi.com. If you withdraw your consent, you must stop using the Services. Zambesi is the controller of your personal information.

Types of personal information we collect and hold

“Personal Information” means personal information or an opinion about you or which is reasonably identifiable as you, whether or not the personal information or opinion is true and whether or not the personal information is recorded in a material form; and

The types of personal information that we collect includes:

- name, address, email address, telephone number and other contact details;
- records of our interactions with you;
- current employment status, your occupation and length of employment, level of education;
- your computer and connection information, statistics on page views, traffic to and from Zambesi and other standard web log information;
- any information about your career goals, training objectives and future needs;
- any other personal information that may be required in order to facilitate your dealings with us;
- any other personal information you may volunteer.

We may collect personal information about:

- individuals;
- contractors and suppliers;
- third parties seeking or using our services or products;
- other people who come into contact with us in the ordinary course of business; and
- applicants applying for a job or position with us: we may collect certain information from you (including your name, contact details, working history and relevant records checks) from any recruitment consultant, your previous employers and others who may be able to provide information to us to assist in our decision whether or not to make you an offer of employment or engage you under a contract. This Privacy Policy does not apply to acts and practices in relation to employee records of our current and former employees, which are exempt from the Privacy Act.

How we collect and hold personal information

In general, we do not collect your personal information, unless you provide it to us voluntarily and knowingly during your dealings with us, including by way of:

- when you voluntarily use the Services;
- personal contact with us at a face-to-face meeting or situation;
- correspondence, chats, social applications or services, mail, email or telephone;
- when you invest in our business or enquire about a potential acquisition of our business.

In some cases, we collect personal information from third parties including our related companies and our service providers.

We may hold your personal information in hard copy files and/or electronic files.

Security

Zambesi takes reasonable steps to ensure that all personal information that we collect is kept secure in accordance with industry standard physical, electronic and managerial procedures. All of our staff are trained to comply with this Privacy Policy. In respect of personal information collected online or stored electronically (including in the cloud) in particular, you acknowledge that no security system is impenetrable and that the security of such networks and systems can never be guaranteed. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information which is transmitted to us is transmitted at your own risk.

Why we collect, hold, use and disclose your personal information

Zambesi will use and disclose your personal information only for the purpose (the “**primary purpose**”) for which you provide it to us, which may include:

- to provide you with any services that you may request including enabling you to access and use the Services from time to time.
- to respond to any query or complaint that you may make or otherwise provide customer support;
- for internal administration and operational purposes such as preventing fraud and abuse of our systems and to troubleshoot bugs;
- to operate, protect, improve and optimise the Services and our business such as to perform analytics, conduct research, evaluation and development and quality control purposes and for advertising and marketing;
- for all purposes relating to recruiting and assessing your suitability for jobs with us and to consider your employment or contractual engagement application.

Who we disclose your personal information to

We may disclose your personal information to:

- third party contractors engaged to perform functions or provide services relating to the purposes for which we collect personal information. If this is the case, we will take reasonable steps to ensure that they comply with this Privacy Policy;
- third party service providers or affiliates within or outside of Australia who work on behalf of or with us to provide some of our administrative and other services, such as processing payments (such as credit card payments). We require such service providers to agree not to use such information except as necessary to provide the services to us;
- third party partners who may partner with us to organise an event that you have attended;
- professional advisers, dealers and agents;
- any party to whom our assets or business may be transferred or with whom we are merged;
- enforcement or regulatory authorities, within and outside of Australia, if required by law.

Cookies

While we do not use browsing information to identify you personally, we may use cookies, web beacons, and other tracking technologies to collect certain information about your use of the Services

such as the pages you visit, the date and time of your visit, your IP address and your interaction with the website. A cookie is a small file containing a string of characters that is sent to your computer or mobile device when you visit a website. When you visit the website again, the cookie allows that site to recognise your browser. Cookies may store unique identifiers, user preferences and other information. You can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, some website features or services may not function properly without cookies.

Secondary purpose

We will not use or disclose your personal information for any secondary purpose, unless you consent to that use or disclosure; or you would reasonably expect the use or disclosure in the circumstances, and that secondary purpose is related to the primary purpose for which we have collected that information. Except as set out in this Privacy Policy (or as required for by any statutory or legal requirements), we do not share, sell, rent or otherwise disclose your personal information to third parties.

Managing your personal information

We will take reasonable steps to ensure that any personal information we collect is up-to-date, complete and accurate, and any personal information that we use or disclose is up-to-date, complete, accurate and relevant.

You may contact us at hello@zambesi.com or at Level 13, 333 George St, Sydney 2000 to seek any of the following:

- **Access:** You can ask us for a copy of your personal information.
- **Change or correct information:** You can also ask us to correct or update your personal information.
- **Delete your personal information:** You can ask us to erase or delete all or some of your personal information (e.g. if you withdraw your consent, or it is no longer necessary to provide the Services to you).
- **Object to, or limit or restrict, use of personal information:** You can ask us to stop using all or some of your personal information (e.g., if we have no legal right to keep using it) or to limit our use of it (e.g. if your personal information is inaccurate or unlawfully held).

Sometimes we may not be able to provide you with access to some or all of your personal information. If this is the case, we will tell you why. We may need to verify your identity when you request access to your personal information.

Complaints about a privacy breach

If you believe that we have breached this Privacy Policy, you may direct your complaint to us at hello@zambesi.com or at Level 13, 333 George St, Sydney 2000. Please include your name, email and/or telephone number. We will review your complaint and liaise with you directly to resolve your complaint within a reasonable time.

Changes to our Privacy Policy

Any changes to this Privacy Policy will be posted onto the website. Unless stated otherwise, changes will be effective immediately upon being placed onto the website. Your continued use of the Services following such amendments being placed on the website will represent an agreement by you to be bound by the Privacy Policy as amended.