PIXEVETY PLATFORM PRIVACY POLICY

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Who we are

pixevety.com is owned and operated by Pixevety Pty Ltd (ACN 160 684 677), an Australian private company based in New South Wales, with offices in Sydney, NSW and Brisbane, Qld.

Pixevety Pty Ltd is a digital service provider. We offer individuals and organisations the ability to manage images (i.e., photo and video content) in a secure, permission-based environment.

We care deeply about your privacy and have designed our services and business model to reflect our commitment to ensuring the fair and appropriate handling of your personal information.

We apply **two (2) privacy policies** to our operations – one for our brochure site and the other for our secure image management platform ("pixevety platform").

This document, **pixevety Platform Privacy**, explains how we collect and handle your personal information on the pixevety platform. It is part of our Terms that you understand our privacy practices before you sign-up to use the pixevety platform.

In addition to the information in this document, you can read more about our approach to privacy in our FAQs.

Our policy commitment

Pixevety Pty Ltd applies the privacy principles set out in Australia's *Privacy Act 1988*. The privacy principles guide how we collect and manage your personal information, including (but not limited to):

- being transparent about our personal information handling practices
- limiting collection of personal information to that which is necessary for our functions
- understanding our business purposes, and restricting our use and disclosure of personal information in that regard
- taking reasonable steps to keep the personal information we have secure.

Our business model allows both individuals and organisations to use the pixevety platform. You use the pixevety platform when:

- you are our **customer** (i.e., you have an account with us and are paying for our services, or you have a complimentary subscription), and/ or
- **an organisation** such as a school or sporting club is our customer and they are using the pixevety platform to manage your images (i.e., the organisation has an account with us and is paying for our services, and you have been invited by the organisation to join its Gallery).

Important note: When the pixevety platform is used by an organisation such as a school or sporting club to manage images, Pixevety Pty Ltd is considered a service provider to that organisation. If you have registered with us in order to join an organisation's Gallery please take a moment to read that organisation's privacy policy too.

Personal information

Personal information is information that identifies you (or could reasonably lead to you being identified).

Depending on our relationship with you, and the functionalities you wish to use on the pixevety platform, the personal information we collect is:

- name
- contact details
- images within user galleries (e.g. digital photo or video)
- key metadata relating to images (e.g. name or location of the person featured in an image)
- facial recognition data (encrypted and Gallery specific)
- other personal information you provide during the course of using the pixevety platform (e.g. your preferred privacy settings), or when you ask us to provide additional services (e.g. inviting another person to have access to your Gallery)
- personal information contained in documents or text files (other than images) that you choose open or share using the platform
- account-related information (e.g. payment history)

Collecting personal information

We collect personal information when you:

- are a customer and you have set up an account with us
- are asked by an organisation to join its Gallery and you register with us to allow this
- add and manage your images on the pixevety platform
- pay us for your subscription to the pixevety platform
- ask us a question or make a complaint
- answer questions that we ask you (in order for us to assist you).

Consent

Consent is an important privacy concept that applies to our collection of your personal information, how personal information is managed on the pixevety platform and your own obligations before uploading images of a person.

Handling of personal information, generally

As set out in our Terms, in using the pixevety platform you agree to the collection and handling of your personal information by Pixevety Pty Ltd for the purposes of the pixevety platform.

Sensitive information

The pixevety platform collects and manages your images – including photos, digital photos and videos. Images may be considered "sensitive information" if they include or reveal information that identifies your religion, sexual orientation or political

affiliation (e.g. an image of you wearing particular clothing or adornments may reveal your religion).

As set out in our Terms, in using the pixevety platform you agree to the collection and handling of your personal information *which may include* sensitive information.

Images - our permission-based approach
We handle the images you upload to the pixevety platform based on your permissions (which you can change at any time). The pixevety platform will only do with your images what you allow or agree to within the platform's privacy settings.

Personal information of other people
As set out in our Terms, if you intend to upload the images of *people other than you* to the pixevety platform, you must first have consent from the individuals depicted to:
- upload to and manage their images using the pixevety platform, and
- use and disclose their images for your purposes.

This includes making them aware of Pixevety Pty Ltd's privacy practices, as set out in this document.

Where organisations such as schools are using the pixevety platform to manage images, the consent module may assist in this regard.

Personal information of children under age 16
As set out in our Terms, Pixevety Pty Ltd does not knowingly collect or solicit personal information from anyone under the age of 13.

In addition, it is a condition of using the pixevety platform that, if you intend to upload the images of a child under age 16 to the platform, you must first have consent from the child's parent (or legal guardian) to
- upload to and manage the child's images using the pixevety platform, and
- use and disclose the child's images for your purposes.

This includes making the parent (or legal guardian) aware of Pixevety Pty Ltd's privacy practices, as set out in this document.

Where organisations such as schools are using the pixevety platform to manage images of a child under age 16, the consent module may assist in this regard.

Accuracy
Some of the personal information collected via the pixevety platform will rely on you to ensure its accuracy (e.g. account and payment-related information, and permissions or restrictions you place on your own images). We encourage you to review your account details

to ensure they remain up to date, and to check your privacy settings regularly to ensure they continue to meet your needs.

Before we use your personal information (and particularly if some time has elapsed), we may double check with you to make sure it is accurate, complete and up to date.

What we do with personal information, and who we give it to

We use and disclose your personal information to:
- verify your identity and other details you provide to us
- respond to a question you ask us about the pixevety platform
- send you information that you have asked for
- direct you to our FAQs and other resources, and
- investigate and respond to a complaint made by you.

We may also share elements of your personal information to the service providers who work with us in providing our services to you, including:
- contracted service providers (as set out in more detail below)
- service providers who monitor and analyse the operation and security of the pixevety platform, or who provide administrative, technical and organisational services to our staff, and
- consultants and professional advisers.

If Pixevety Pty Ltd or its assets are acquired, or if we go through some other change of control affecting the pixevety platform, we may transfer your personal information to a third-party acquirer.

Keeping your personal information safe

We securely manage and dispose of personal information, whether it is held in hard copy or electronic format and whether it is stored on-site or in 'the cloud'.

We operate our business and the pixevety platform in accordance with detailed information security policies and procedures (which are compliant with the *International Standard (ISO) 27002* and relevant industry best practices). We also have measures in place to identify, respond to and prevent data breach events.

Protection of your personal information from unauthorised access and disclosure is a priority for us. Any concerns should be reported to us without delay, by email to privacy@pixevety.com or telephone: 1300 438 389

Contracted service providers

We use contracted service providers to securely store personal information and to manage or enhance the functionality of the pixevety platform.

Personal information is generally managed in a digital environment ('the cloud') by our service providers. It is a condition of our agreements with these providers that we remain in control of what happens to the personal information they manage on our behalf *and* that it is kept secure.

Secure data storage

Pixevety Pty Ltd holds and secures personal information collected and managed by the pixevety platform within local (Australian) data-centres and back-up sites. Personal information is not transferred or managed off-shore, except *where requested or allowed by a user* with regard to the limited functionalities explained below.

Secure payments

Pixevety Pty Ltd uses a local (Australian) secure PCI DSS compliant payment provider for all of our fee-for-service transactions – e.g. pixevety platform subscriptions and add-ons. Payments are made using a secure gateway, which can be accessed via the pixevety platform.

Functionalities

We offer the following functionalities within the pixevety platform:
- user support (e.g. help-desk)
- image recognition and tagging (e.g. object, colour and location recognition), and
- facial recognition

To ensure the greatest extent of privacy protection we operate the pixevety platform using "on premises" functionalities unless it is prohibitive for us to do so. In limited circumstances, we may use another cloud-based service provider who stores data in Australia-only to supply a specific service or functionality.

The following functionalities are presently managed "on premises":
- user support

We presently use service providers who only store their data in Australia to provide the following functionalities:
- Image recognition (e.g. object, colour, location) and tagging. **Please note**: The image recognition functionality can be turned off in your privacy settings if you wish. Images/media that apply this functionality are never stored offshore
- Facial recognition: Facial recognition is an algorithmic process. It is encrypted and specific to each Gallery. Neither images nor identifiable data are stored offshore.

Where service providers are engaged by Pixevety Pty Ltd, they are not permitted to handle (manage, use, disclose or retain) personal information in any way other than *as expressly required* to provide the service. Further information about our contracted service providers can be found in the [FAQs](#).

You will never hear directly from our service providers unless the contact is in direct relation to a request you have made via the pixevety platform. If you do hear from them, they will always identify themselves as employees of Pixevety Pty Ltd and will be able to offer legitimate verification of their role with us. If you are ever in doubt, please contact us directly on tel: 1300 438 389.

Third party service providers

There may be instances where we allow third-party service providers to attract pixevety platform users by placing advertising banners on our brochure site. They will not, however, have any form of direct access to you via the pixevety platform, and we do not disclose (or sell) your personal information to them.

As set out in our Terms, you have the option to link to a number of third-party service providers from the pixevety platform (e.g. to arrange secure printing of your favourite images). We have not vetted their personal information handling practices, so please take a moment to read the privacy policies of any providers to which you may link to make sure their service, product and approach to privacy is right for you.

Our FAQs provide additional information about some of the services that you may choose to link to from the pixevety platform.

Marketing

We may use the personal information you give to us to send you direct marketing. The direct marketing may relate to existing services on the pixevety platform and new developments we believe will interest you.

You can choose **not** to allow this when:
- you use the **opt-out** selection available on your My Account page (which you can use when you sign-up or at any time), or
- you click **"unsubscribe"** when you receive a direct marketing communication.

We will never provide your personal information to third parties for marketing purposes unless you specifically request us to.

Accessing and changing personal information we have about you

We support your right to access your own personal information without unreasonable expense or delay.

Access

With very limited exceptions, if we hold personal information about you on the pixevety platform we are happy to tell you what it is. We will not, however, tell

someone else what personal information we hold about you (unless you permit us or there is a lawful ability or requirement for us to do so).

To assist you, we have a process for gaining access to the personal information held about you on the pixevety platform. Simply go to your My Account page and click the **"Request my personal information"** link. You will be asked to verify your identity before your request is processed. We may charge a fee for retrieving your personal information, in which case we will tell you what the fee is and obtain your agreement to pay it before providing the information.

If you are unable to use our online process, please contact us at privacy@pixevety.com to discuss your options.

Making changes
You are able to update the personal information relating to your account with us at any time by visiting your My Account page on the pixevety platform.

If you are unable to make the changes yourself using the pixevety platform, please contact us at privacy@pixevety.com to discuss your options.

Important note: When the pixevety platform is used by an organisation such as a school or sporting club to manage images, Pixevety Pty Ltd is considered a service provider to that organisation. In such cases, you *may not* be able to access or change particular types of personal information directly via the pixevety platform (e.g. you will be unable to change a unique ID number given to you by the organisation). In such cases, please contact the organisation directly with your request.

Anonymity
We are unable to provide our image management services to you anonymously.

It is the nature of the pixevety platform that personal information in the form of images must be provided to get full use out of the platform. If you choose not to provide any images, you may wish to consider whether the use of our platform is right for you.

Cookies
The pixevety platform uses cookies in accordance with our Cookie Policy. A cookie is a small piece of data that our platform (accessed via pixevety.com) asks your browser to store on your PC, laptop, smartphone or other device. Cookies act like signposts, markers or tiny pieces of memory that enable us to give you the best experience possible when using the platform.

Do I have to allow the use of cookies?
No. However, the use of cookies by the pixevety platform supports your use of the platform (including the ongoing security of your personal information in that

environment), and disabling our ability to deploy them may prevent you from using the platform with ease.

If you wish to disable, delete, prevent or clear cookies, you can follow the <u>instructions available on your web browser</u>.

Analytics

While we use Google Analytics for brochure site purposes, we do not use this service on the pixevety platform itself.

Privacy complaints

We take privacy seriously. If you have a question about how we collect and handle your personal information or a complaint about a breach of privacy made by Pixevety Pty Ltd, please contact us:

Mail:
Privacy Officer
Pixevety Pty Ltd
PO Box 7056
Brookvale, NSW, 2100

Email:
privacy@pixevety.com

Updates to pixevety Platform Privacy

We may update this document from time to time to ensure that our personal information handling practices are correctly reflected. This may occur without notice; however, we will always post a "last revised" date for your information.

Any questions or concerns?

If you have a question about your privacy while using the pixevety platform, or a concern about our personal information handling practices, please be in touch! Please email privacy@pixevety.com or telephone: 1300 438 389.