

KARMACODE PRIVACY POLICY

This Privacy Policy applies to all personal information collected by KARMACODE PTY LTD (ACN 653 031 693) ('**Karmacode**', '**we**', '**us**', '**our**') via the website located at <http://www.sitecloud.com.au> and its sub-domains, as well as our mobile device software application (collectively, our '**Platform**').

1. What is "personal information"?

- (a) The *Privacy Act 1988 (Cth)* currently defines "personal information" as meaning information or an opinion about an identified individual or an individual who is reasonably identifiable:
 - (i) whether the information or opinion is true or not; and
 - (ii) whether the information or opinion is recorded in a material form or not.
- (b) If the information does not disclose your identity or enable your identity to be ascertained, it will in most cases not be classified as "personal information" and will not be subject to this privacy policy.
- (c) For the sake of brevity, references to "personal information" in this document also include "sensitive information" as defined in clause 2 below and the *Privacy Act 1988 (Cth)*, unless expressly stated otherwise.

2. What is "sensitive information"?

The *Privacy Act 1988 (Cth)* currently defines "sensitive information" as information about a person's health information, membership of a professional or trade association, and biometric information, among many other types of information that also within the definition of personal information.

3. What information do we collect?

- (a) The kind of personal information that we collect from you will depend on the type of user you are and how you use the Platform.
- (b) The personal information which we collect and hold about you may include:
 - (i) full name;
 - (ii) telephone number;
 - (iii) email address;
 - (iv) address of your place of business;
 - (v) trade certifications and licences;
 - (vi) occupational health and safety-related information (e.g. relevant medical conditions, allergies, and medications);
 - (vii) date of birth.

4. How we collect your personal information

- (a) We may collect personal information from you whenever you input such information into the Platform.

- (b) We also collect cookies from your computer which enable us to tell when you use the Platform and to help customise your experience on the Platform. Generally, it is not possible to identify you personally from our use of cookies, although it may be possible to identify a person by correlating information stored in cookies with information from other sources.

5. Purpose of collection

- (a) The purpose for which we collect personal information is to provide you with the services that the Platform is intended to provide.
- (b) We customarily disclose personal information to our service providers who assist us in operating the Platform. Your personal information may also be exposed from time to time to maintenance and support personnel acting in the normal course of their duties.
- (c) We collect your sensitive information for the purpose of enabling the Platform to store:
 - (i) Trade certifications and licences that may be required of builders, head contractors, and subcontractors; and
 - (ii) Workplace health and safety information;related to a construction project or worksite that is managed via our Platform.
- (d) You hereby authorise us to collect and store sensitive information for the purposes disclosed in clause 5(c) above.
- (e) As at the time of drafting this Privacy Policy, our service providers are:
 - (i) Amazon Web Services, Inc.
 - (ii) Stripe, Inc.These companies are incorporated in the United States of America ('USA') and your personal information may be subject to privacy protections and disclosure obligations under the laws of the USA.
- (f) Our service providers' privacy policies and terms of service can be accessed at these links (which may change from time to time):
 - (i) https://aws.amazon.com/terms/?nc1=f_pr
 - (ii) <https://aws.amazon.com/privacy/>
 - (iii) <https://stripe.com/en-au/legal/ssa>
 - (iv) <https://stripe.com/en-au/privacy>
- (g) Our service providers may be changed from time to time, and you agree that we may change our service providers without any notice to you, provided that we reasonably endeavour to use reputable service providers who are either subject to the *Privacy Act 1988 (Cth)* or have privacy policies that provide similar or better privacy protections.

6. Direct marketing

- (a) By using our Platform, you consent to the receipt of direct marketing material. Our direct marketing material will only be for our products and services, and not those of third-parties.

- (b) We will only use your personal information (but not sensitive information) for this purpose if we have collected such information directly from you.
- (c) We will not use your sensitive information in direct marketing activity.
- (d) We do not supply your personal information to any third-party for their direct marketing purposes.
- (e) Our direct marketing material will include a simple means by which you can request not to receive further communications of this nature.

5. Access and correction

Australian Privacy Principle 12 permits you to obtain access to the personal information we hold about you in certain circumstances, and Australian Privacy Principle 13 allows you to correct inaccurate personal information subject to certain exceptions. If you would like to obtain such access, please contact us as set out below.

6. Complaint procedure

- (a) If you have a complaint concerning the way we maintain the privacy of your personal information, please contact us as set out below. We will consider all complaints and may seek further information from you to clarify your concerns. If we agree that your complaint is well founded, we will, in consultation with you, take appropriate steps to rectify the problem.
- (b) If you remain dissatisfied with the outcome, you may refer the matter to the Office of the Australian Information Commissioner.

7. How to contact us about privacy

If you have any queries, or if you seek access to your personal information, or if you have a complaint about our privacy practices, you can contact us through:
info@sitecloud.com.au.