

Privacy Policy

1. Our commitment to privacy

SoapBox Pty Limited (ACN 609 403 429) (referred to as *we*, *our* and *us*) is committed to protecting the privacy of all Personal Information that we collect from you and to complying with our obligations under the Privacy Act 1988 (Cth) (**Privacy Act**) and the Australian Privacy Principles.

Please take a moment to read our Privacy Policy as it describes what happens to your Personal Information that is collected via our Subscription Services and Website.

2. Definitions

Client Software means any software owned by third parties with which we have designed the Software to be used or integrated.

Personal information means information or opinion about an identified individual, or an individual who is reasonably identifiable.

Privacy Policy means this privacy policy.

Sensitive Information has the meaning given in the Privacy Act.

Software means Sofi.ai and includes all related services, software upgrades and updates, add-on components, web services, supplements and other material provided by us in relation to that software.

Subscription Services means our software as a service (SaaS) offerings made available to clients from time to time and includes the Software.

Website means our website at www.soapbox.ai.

In this Privacy Policy, wherever *includes* or *including* is used, it will be read as if it were followed by (*without limitation*).

3. Overview

Where practicable, we will deal with you anonymously or under a pseudonym. However, due to the nature of our products and services, where you do not wish to provide us with your Personal Information, you will not be able to use the Subscription Services and we may not be able to provide you with the products or services you require or an appropriate level of service.

We collect and hold Personal Information that is reasonably necessary for, or directly related to, one or more of our functions or activities.

4. Our purposes for handling your Personal Information

As a general rule, we only handle Personal Information for purposes that would be considered relevant and reasonable in the circumstances. We will only collect Personal Information that is necessary for the purposes described in this Privacy Policy, or other purposes specifically communicated to you. We use fair and lawful methods to collect Personal Information.

We collect, hold, use and disclose Personal Information to:

- give you the ability to access and use our Subscription Services and Website;
- enabling you to use the Subscription Services in conjunction with the Client Software;
- provide you with products and services;
- promote related products and services to you;

- enable you to access information about us and our products and services;
- comply with our legal and regulatory obligations; and
- otherwise manage our business.

5. Types of Personal Information we collect

We obtain Personal Information directly from our clients via our Subscription Services and Website. We also obtain Personal Information from the providers of the Client Software when our clients access and use our Subscription Services.

When you browse our Website

When you visit our website we collect your location information, IP address, and other details of your interaction with us.

When we provide you with products and services

To provide products and services to you, the Personal Information that we collect includes your name, ABN, email address, phone numbers and address.

When you use our Subscription Services and Website

To use our Subscription Services, you must be registered as a client and provide us your name, gender, email address, phone numbers and address. You may provide further information to facilitate your access and use of the Subscription Services.

We may collect information about how you use our Subscription Services and Website to assist us to provide you with more tailored services, and to enable us to develop and improve our services. When you use our Subscription Services or Website, the information we may collect includes:

- the functions you have used;
- all content and information that you share or provide through the Subscription Services (which may include your Sensitive Information, if you chose to share that information);
- how you have shared that content and information through the Subscription Services;
- third party content you have received;
- advertisements you have clicked on; and
- third party websites you have access to via our Subscription Services and Website.

We may also collect information from the devices and networks that you use to access our Subscription Services and Website to help us develop and secure our services. The information we may collect can include:

- the internet protocol (IP) address of your computer or the proxy server that you use to access the internet;
- your computer operating system;
- your type of web browser;
- your mobile device;
- your mobile operating system; and
- the name of your ISP or your mobile carrier.

We obtain some of this information from third party analytics companies whom we have allowed to access a de-identified database in order to provide us with this information.

We may use 'cookies' to store and sometimes track information about you, but only on an anonymous basis. A cookie is a small amount of data sent from a server which is stored on your computer's hard drive. You can set your browser to refuse cookies or to ask you before your browser accepts them. Certain parts of our Subscription Services and Website may require a cookie to be activated and, if you choose to reject the cookie, a particular feature may not be available to you.

6. How we handle your Personal Information

We will collect and hold your Personal Information in a fair and lawful manner, and not in an unreasonably intrusive way. We obtain Personal Information directly from you, as well as from providers of the Client Software. We will sometimes also collect your Personal Information from other third parties, including from our related companies and publically available sources.

Direct collection

We may collect the Personal Information you directly give us through some of the following means:

- when completing the registration process for our Subscription Services;
- when you access and use our Subscription Services;
- when you make an application for, or sign our agreement for, the provision of our products or services;
- when you request any information regarding our products or services in person, by phone or via our Subscription Services or Website;
- while conducting customer satisfaction and market research surveys;
- whilst administering any of our services; and
- as otherwise required to manage our business.

Automatic collection

We may collect your Personal Information automatically through some of the following means:

- we may receive location data passed to us from third party services or GPS-enabled devices you have set up;
- we may collect information about how you use our Subscription Services and Website to assist us to provide you with more tailored services and to enable us to develop and improve our services;
- we may also collect information from the devices and networks that you use to access our Subscription Services and Website to help us develop and secure our services; and
- we may use 'cookies' to store and sometimes track information about you, but only on an anonymous basis.

7. Use and disclosure of Personal Information

We will only use and/or disclose your Personal Information in accordance with the Privacy Act and the Australian Privacy Principles.

Primary purposes

The primary purposes for which we use and disclose your Personal Information include:

- giving you the ability to access and use our Subscription Services and Website;
- enabling you to use the Subscription Services in conjunction with the Client Software;
- Subscription Services registration procedures;

- verifying your identity;
- providing you with our products or services;
- providing you with information in relation to the use of our products or services;
- providing quality assurance for our products and services;
- providing you with information available through our Subscription Services and Website;
- maintaining user records;
- administering and managing our products or services, including charging, billing and collecting debts;
- responding to your enquiries and feedback regarding our business, our products and our services;
- complying with government legislation and regulations; and
- internal management purposes, complaint handling, planning, quality assurance and audit purposes.

Specific examples of third parties to whom we may disclose Personal Information include:

- our related companies;
- the providers of the Client Software;
- our third party service providers (such as our third party providers of backup and data storage services, content services, website hosting services, marketing services, market research and analytical services, distribution and mailing services);
- our third party providers of software and services which incorporated in, or integrated or linked with, our Subscription Services or Website;
- any purchaser or potential purchaser of our business or assets;
- our professional advisers, including our accountants, auditors and lawyers; and
- government and regulatory authorities and other organisations, as required or authorised by law.

Secondary purposes

We may also use and disclose your Personal Information we collect for a secondary purpose. A secondary purpose is one which is related to the primary purpose of collection. Some of the secondary purposes for which we may use your personal information include:

- promoting and marketing our products and services to you;
- product and service development;
- customer and market research; and
- keeping you informed of any changes to our business, products and services or other offerings that may be of interest to you.

We will not use or disclose your Personal Information for any other purpose unless you have consented to that use or disclosure.

Direct marketing

We may use your Personal Information, including your contact details, to provide you with information about our products and services, which we consider may be of interest to you.

We will not disclose your Personal Information to third parties for marketing purposes.

You may opt out at any time if you no longer wish to receive direct marketing information from us. You can make this request by contacting our Privacy Officer.

8. Transfers of Personal Information overseas

As the internet is a global environment, using the internet to collect and process Personal Information necessarily involves the transmission of that information worldwide.

In addition, we may disclose your Personal Information to:

- providers of the Client Software, who may be located overseas; and
- our third party product and service providers who are located overseas, including in the United States of America.

By trading and communicating with us, you acknowledge and agree to us using and disclosing your Personal Information in this way.

9. Access

You have a right to access your Personal Information. We will generally provide it to you but in some cases where and to the extent permitted by law, we may refuse access to some or all of that information. In those circumstances we will provide reasons.

To make a request, you will need to obtain and complete an application form verifying your identity and specifying what information you require. You should contact our Privacy Officer on 0414 551 561 or privacy@soapbox.ai to make a request.

10. Accuracy and corrections

We will take reasonable steps to ensure your Personal Information is accurate, complete and up to date. If you believe that any Personal Information we hold about you is not accurate, complete or up to date, then please contact our Privacy Officer on 0414 551 561 or privacy@soapbox.ai.

11. Security

We will take all reasonable steps to ensure your Personal Information is kept secure.

We maintain appropriate physical, procedural and technical security for our offices and information storage facilities so as to prevent any loss, misuse, unauthorised access, disclosure, or modification of Personal Information. This also applies to disposal of Personal Information.

In addition, we protect Personal Information by restricting access to those people who need access to do their job.

12. Resolving personal information concerns

If you have any questions, concerns or complaints about this Privacy Policy, or our use of your Personal Information, please email our Privacy Officer at privacy@soapbox.ai or write to

The Privacy Officer
Soapbox Pty Limited
9 Valentine Avenue, Kew, Victoria, 3101
Phone: 0414 551 561

Once a complaint has been lodged, the Privacy Officer will respond to you as soon as possible. We will endeavour to respond to any complaints received within 30 days.

You may also lodge a complaint with the Office of the Australian Information Commissioner by telephone: 1300 363 992 or email: enquiries@oaic.gov.au.

13. Changes

We reserve the right to change the terms of this Privacy Policy from time to time, without notice to you. The current version of our Privacy Policy is available at:

www.soapbox.ai

The last update to this document was on 18 June 2018.