

# Privacy Policy

**Of Echo IQ Limited**

**ACN 142 901 353**

**Effective starting: 5th December 2022**

Echo IQ recognises the importance of the performance of online technology and how personal information is collected, stored, used and disclosed. Echo IQ is bound by the Australian Privacy Act 1988 (Cth) (Privacy Act) and the Australian Privacy Principles (APPs) set out in the Privacy Act and understands the importance people place on their personal information. At Echo IQ, we are committed to ensuring that all information collected by us is treated with the appropriate degree of privacy and confidentiality. Our employees understand their responsibility to protect and use your personal information correctly.

This privacy policy is intended to provide you with a general explanation of how we may collect, store, use and disclose your personal information and takes into account the changes made by the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth).

This privacy policy was last amended on 23 February 2021 and will be reviewed and updated from time to time to ensure that it reflects our current information handling practices and any relevant legislative changes. Echo IQ reserves the right to amend this privacy policy at any time without notice to you, with such amendments to take effect from the date of publication of the amended policy on our website [www.echoiq.ai](http://www.echoiq.ai)

To the maximum extent permitted by law, neither [www.echoiq.ai](http://www.echoiq.ai) nor any other related entity will be liable to you or to any third party for any loss or damage resulting from any User Content posted on [www.echoiq.ai](http://www.echoiq.ai)

## **COLLECTION OF INFORMATION**

We may collect personal information that is reasonably necessary for, or directly related to, one or more of our services or activities; or because it is required under relevant law or regulation.

The type of personal information we may collect includes your name, IP address, browser type, address, telephone number, email address, occupation and other information that is capable of identifying you (including information about your work experience in the event that you apply for a position with us) or details regarding conversations we have had with you. This information is kept and treated as confidential information and will only be used by Echo IQ.

Echo IQ will generally collect personal information directly from you or your authorised representative through conversations, emails, meetings or using tools such as the Internet and forms on our website and web-based applications. There may be some instances where personal information about you will be collected from a third party, a publicly available source or by other lawful means, but only if:

- > you have provided your consent, or you would reasonably expect us to collect your personal information; or
- > it is necessary for a specific purpose such as executing a function or activity in connection with your dealings with Echo IQ; or

- > we are permitted, or required to, by applicable law.

We will usually notify you about these instances in advance or where that is not possible, as soon as reasonably practicable after your information has been collected. If the personal information you provide to us is incomplete or inaccurate, we may be unable to provide you or your authorised representative with the requested services and/or information.

Separate guidelines apply to information held in relation to the staff of Echo IQ.

## HOW WILL WE MAKE SURE YOUR DATA IS SECURE?

We follow strict security practices to manage how your personal data is stored, used, who sees it and to help stop any unauthorised person getting hold of it. All personal data you register with Echo IQ will be located behind strong network security controls including firewalls and encryption at rest and in transit. Echo IQ maintains a range of internal Information Security Policies that govern how we protect your data.

## COOKIES

### As used in our website

Our website uses cookies. The main purpose of cookies is to identify users and to prepare customised web pages for them. Cookies do not identify you personally, but they may link back to a database record about you. We use cookies to monitor the usage of our website and to create a record of when you visit our website and what pages you view so that we may serve you more effectively. This means:

- > where necessary to provide the website and its features available and in order to give you the best user experience;
- > where we are under a contractual or legal obligation to do so;
- > for our legitimate interests; or
- > where you have explicitly consented (for example, by actively signing up to receive our newsletter).

You can indicate your acceptance to our use of cookies in accordance with this policy by clicking “OK” in the appropriate place on the banner that appears on Echoiq.ai. However, please note that if you do not click “OK” but continue to browse the site, you will be deemed to have accepted our use of cookies (and what we use them for) in accordance with this Privacy Policy.

Other sites and services (including, for example, advertising networks, providers of external services like web traffic analysis services and content recommendation engines) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies and we use these to try and improve your experience on Echoiq.ai As of 1 November 2019, we use the following third-party cookies:

- > Google Analytics – Web Analytics
- > Google Tag Manager – Tag Manager

Further information on the general use and function of the third party cookies listed above can be found at <http://optout.aboutads.info/#/>.

### As used in our web-based applications

Our web-based applications use cookies. The main purpose of cookies in our web-based applications is to identify users to persist your authenticated sessions. Cookies do not identify you personally, but they may link back to a database record about you. We use cookies to monitor the usage of our web-based application and to create a record of when you visit the application and what pages you view so that we may serve you more effectively. This means:

- > where necessary to provide the application and its features available and in order to give you the best user experience;
- > where we are under a contractual or legal obligation to do so;
- > for our legitimate interests; or
- > where you have explicitly consented (for example, by accepting the terms of use).

You indicate your acceptance to our use of cookies in accordance with this policy by signing in to our applications.

Other sites and services (including, for example, advertising networks, providers of external services like web traffic analysis services and content recommendation engines) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies and we use these to try and improve your experience on our applications. As of 23 February 2021, we use the following third-party cookies:

- > None

### **How do I turn cookies off?**

If you do not wish us to install cookies or you don't agree with how we use these cookies, you can change the settings on your internet browser to reject them. For more information, please consult the "Help" section of your browser. Please note that if you do set your browser to reject cookies, you may not be able to use all of the features on our website or access our web-based applications

Our website, apps and web-based applications may contain links to other websites. We are not responsible for the privacy practices of linked websites and linked websites are not subject to our privacy policies and procedures.

## **HOW WE DEAL WITH UNSOLICITED INFORMATION**

Sometimes we receive unsolicited information from individuals or from other sources. If we determine that we could not have collected the information for one or more of our functions or activities, we will take reasonably practicable steps to de-identify or destroy the information. Alternatively, we will take reasonable steps to protect the information from misuse or unauthorised disclosure. Disclosure of unsolicited information we hold may be made where required or permitted by law.

## **HOW YOUR INFORMATION IS USED**

The personal information that we collect and hold about you depends on your interaction with us. Generally, we will only collect and hold your personal information where it is reasonably necessary for us to establish and/or maintain a relationship with you. We will use your personal information for the primary purpose it was collected, in order to:

- > provide services to you;
- > facilitate our internal business operations;
- > analyse our services and customer needs with a view to developing new or improved services;
- > provide you with information about other services that we offer that may be of interest to you (Marketing Material); or
- > because disclosure or use is required or authorised by law.

Or if your personal information is to be used for a secondary purpose we will seek your specific consent to do so.

We do not sell personal information, and we do not provide your personal information to third parties unless one or more of the following situations apply:

1. we have consent from you;
2. you would reasonably expect, or have been advised that personal information may be used or disclosed;
3. if the use or disclosure is required by lawful authority; or
4. if the use or disclosure relates to one or more of the Prescribed General situations under the Privacy Act including, but not limited to, a serious and imminent threat to somebody's life or health, or if it is reasonably necessary for law enforcement.

We may disclose your personal information for the purposes for which it was collected, to the following recipients:

- > external service providers that may assist us in our business in providing administration, information technology or other services; or
- > anyone else as required by applicable law.

## **PROTECTION OF INFORMATION**

We will take reasonable steps to ensure that the information we hold about you is relevant, accurate, up-to-date and complete. We take reasonable and practicable steps to protect your personal information from loss, misuse, modification, disclosure, interference or unauthorised access.

When we no longer need your personal information, we will take all reasonable and practicable steps to de-identify or destroy the information in a secure manner.

## **ACCESSING YOUR PERSONAL INFORMATION**

You can request that we provide you with access to the information we hold about you, or ask us to correct any personal information we hold about you, that is out-of-date, incorrect, incomplete or misleading. You can contact us by submitting a request in writing to the address set out below. If we are able to, we will action your request within a reasonable time frame following receipt of your request.

We may decline a request for access to personal information in circumstances prescribed by the Privacy Act as amended from time to time. If complying with your request for access or amendment requires considerable time and expense on our part, we may charge you a reasonable fee for providing you with information. If we are unable to agree to your request, we will provide you with an appropriate explanation.

## **CONTACT US ABOUT YOUR PRIVACY RIGHTS**

You also have the following rights when it comes to our handling of your personal data:

- > Right of access – you have the right to request a copy of the personal data we have about you and to request supporting information explaining how the personal data is used. Please note that sometimes we may ask you to provide proof of identity before we show you your personal data – so we can prevent unauthorised access.
- > Right of rectification – you have the right to request that we rectify inaccurate personal data about you that we have.
- > Right of erasure – you have the right to request that we erase all personal data about you that we have (please note that we may be able to reject or restrict the request in some circumstances, depending on the information we hold and our lawful reason to keep it).
- > Right to restrict processing – in some situations, you have the right to request that we do not use the personal data you have provided (e.g. if you believe it to be inaccurate).
- > Right to object, including to direct marketing – you have the right to object to certain processing by us of your personal data (unless we have overriding compelling grounds to continue processing) and the right to object to direct marketing by us.

- > Right to data portability – you may have the right to request that we provide you with certain information that you have provided to us in electronic format or to provide that information to a third party.

Please get in touch with us at the address below if you would like to exercise any of these rights (including having access to your data):

If you require further information about this policy, your personal information, or if you think we may not have complied with any aspect of this Privacy Policy, please contact us at the following address:

Data Protection Officer, Echo IQ Limited / Suite 404, 309 George Street, Sydney, NSW, 2000

Or email: [security@echoiq.ai](mailto:security@echoiq.ai)

If you contact us in relation to your personal information and believe that we have not resolved your request you may apply to the Office of the Australian Information Commission (OAIC) to have your complaint heard and determined here: <https://www.oaic.gov.au/about-us/contact-us/>

## OTHER IMPORTANT PRIVACY INFORMATION

### NOTICE TO END USERS

Many of our products are intended for use by organizations. Where the Services are made available to you through an organization (e.g. your employer), that organization is the administrator of the Services and is responsible for the accounts and/or Service sites over which it has control. If this is the case, please direct your data privacy questions to your administrator, as your use of the Services is subject to that organization's policies. We are not responsible for the privacy or security practices of an administrator's organization, which may be different than this policy.

Administrators are able to:

- > restrict, suspend or terminate your access to the Services;
- > access information in and about your account;
- > access or retain information stored as part of your account;

In some cases, administrators can also:

- > change your information, including profile information;
- > restrict your ability to edit, restrict, modify or delete information

Even if you use an email address provided by an organization (such as your work email address) to access the Services, then the owner of the domain associated with your email address (e.g. your employer) may assert administrative control over your account and use of the Services at a later date. You will be notified if this happens.

Please contact your organization or refer to your administrator's organizational policies for more information.