



Privacy Policy

Date 12 December 2022

Status Final

Privacy Policy

LAB Group

1 Overview

Thank you for using LAB Platform, a platform owned and operated by LAB Group Services Pty Ltd (**LAB**) that allows companies to streamline customer acquisition by providing digital onboarding solutions, electronic document and terms acceptance and electronic identity verification.

Generally, we will process a LAB Platform user's personal information on behalf of one of our customers (**Customer**), who provide financial or investment products or services to that end user. Alternatively, an individual may have provided their information to us, such as if they have interacted with us on social media or contact us directly.

Your privacy is important to us and we are committed to protecting your privacy in accordance with the Australian *Privacy Act 1988* (Cth) which includes the Australian Privacy Principles (**APPs**) and the New Zealand *Privacy Act 2020* which includes the Information Privacy Principles (**IPPs**), and any related privacy codes.

This Policy outlines how we collect, use, disclose and store your personal information and lets you know how you can access that information. This Policy applies to our obligations when handling personal information in Australia and New Zealand.

Please read this Policy carefully and contact us using the details below if you have questions.

2 Consent

By accessing LAB Platform or otherwise providing personal information to us, you consent to us collecting, using, storing and disclosing your personal information in accordance with this Policy or as required or permitted by law. If you continue using our services, then we will treat your use as your consent to us handling your personal information in accordance with this Policy.

3 What kinds of personal information do we collect and hold?

The type of personal information we collect depends on the circumstances of its collection and the nature of your dealings with us.

If you are a customer or prospective customer of a company that is using LAB Platform in its customer acquisition process, this information may include:

- a. your name, email address and phone number;
- b. date of birth;
- c. gender;
- d. details of your employment, including the company you work for and your job title;
- e. your nationality and which countries you hold citizenship of;
- f. government identifiers, such as your Tax File Number or Medicare number (in Australia), or IRD number (in New Zealand);
- g. financial information, such as your credit history, transaction history;
- h. any photos that you upload, such as photo identification;

- i. your device ID, device type and information, geo-location information, Internet Protocol (IP) address, standard web log information browser session data, device and network information, statistics on page views, acquisition sources, search queries, browsing behaviour and information gathered through internet cookies; and
- j. information contained in any communications between you and us.

If you are a prospective employee or independent contractor applying to work with LAB, we may collect the following information:

- a. your name, address and contact details;
- b. business registration details, such as your Australian Business Number or New Zealand Business Number;
- c. your employment details and qualifications;
- d. billing and payment information; and
- e. any other personal information you provide to us as part of the recruitment process.

For general users that have may not use LAB Platform but interact with us in other ways, we may collect information when you connect with us or use our website. This may include information:

- a. provided in communications we have with you; and
- b. about your access and use of our website, including browser session data, device and network information, statistics on page views, acquisition sources, search queries, browsing behaviour and information gathered through internet cookies.

We do not collect sensitive information (as defined in the Australian *Privacy Act 1988* (Cth)) from individuals.

If you choose not to provide information as requested, we may not be able to service your needs. For example, it will not be possible for us to provide you with our service if you want to remain anonymous or use a pseudonym.

We sometimes receive unsolicited personal information. In circumstances where we receive unsolicited personal information we will usually destroy or de-identify the information as soon as practicable if it is lawful and reasonable to do so unless the unsolicited personal information is reasonably necessary for, or directly related to, our functions or activities.

4 Why do we collect your personal information?

We collect your personal information primarily to provide you with our customer acquisition service for any company that you interact with through LAB Platform and to enable your use of LAB Platform.

Some ways we use your personal information are:

- a. for the purpose for which the personal information was originally collected;
- b. to identify and interact with you;
- c. to conduct our business, including performing administrative and operational functions;
- d. to comply with any legal requirements, including any purpose authorised or required by law, or by a court or tribunal; and
- e. for any other purpose for which you give your consent.

In relation to the personal information of contractors, employees and prospective staff members, we collect personal information for purposes including to:

- a. enable us to carry out our recruitment functions;

- b. correspond with you;
- c. fulfil the terms of any contractual relationship; and
- d. ensure that you can perform your duties.

5 How we collect your personal information?

You give it to us

We collect personal information directly from you when you:

- a. use our Services, including LAB Platform;
- b. interact or share personal information with us via our platforms and social media; and
- c. otherwise communicate with or provide the information to us – this may include recording telephone calls that we have with you.

We generally only communicate directly with our Customers and tend to only communicate directly with individuals if you contact us.

We collect it

We may also collect your personal information from third parties including:

- a. any company that you are interacting with through LAB Platform;
- b. service providers;
- c. referrals who may have referred you to us; and
- d. organisations with whom we have an agreement to share information with, including Equifax Australian Information Services and Solutions Pty Limited (**Equifax**), LNRS Data Services Ltd (**LexisNexis Risk Solutions**), IPQualityScore LLC (**IPQS**), AtData, Kyckr Limited and Trulioo Information Services Inc.

We will generally obtain consent from the owner of personal information to collect their personal information. Consent will usually be provided in writing; however, sometimes it may be provided orally or may be implied through a person's conduct. We endeavour to only ask for your personal information if it is reasonably necessary for the activities that you are seeking to be involved in.

6 Disclosing your personal information

We may disclose your personal information for the purposes outlined in this Policy to the following third parties:

- a. our customers who are using LAB Platform to streamline their customer acquisition process;
- b. our business or commercial partners, including Equifax;
- c. other members of LAB's corporate group;
- d. our professional advisers, dealers and agents;
- e. third parties and contractors who assist us with our activities or provide services to us, including customer enquiries and support services, IT service providers, data storage, webhosting and server providers, marketing and advertising organisations, payment processing service providers;
- f. payment system operators and debt-recovery functions if you are a contractor;
- g. third parties to collect and process data, such as Amazon Web Services and Agility Applications; and
- h. any third parties authorised by you to receive information held by us.

We may also disclose your personal information if we are required, authorised or permitted by law.

We may send information to third parties that are located outside of Australia and New Zealand. These third parties are located in the United States of America, the United Kingdom, the European Union, Singapore and the Philippines, although this list may change from time to time. Disclosure is made to the extent that it is necessary to perform our functions or activities and in accordance with the IPPs and APPs (to the extent applicable).

7 Using your personal information for direct marketing

If you work for a business that uses or may benefit from our services, we may use your personal information to contact you to promote and market our products and services.

You can opt-out from being contacted for direct marketing purposes by contacting us at enquiries@labgroup.com or by using the unsubscribe facility included in each direct marketing communication we send. Once we receive a request to opt out from receiving marketing information, we will stop sending such information within a reasonable amount of time.

For the avoidance of doubt, we will not contact Customers' users for direct marketing purposes.

8 Security

We will ensure that all personal information we hold is protected by such security safeguards as are reasonable in the circumstances against loss, unauthorised access, use, modification and disclosure or other misuse and will take all reasonable steps to protect personal information under our control from misuse, interference and loss and from unauthorised access, modification or disclosure. We hold your personal information electronically in secure databases operated by our third-party service providers.

We protect the personal information we hold through encryption, firewalls and login password protocols, secure and access-controlled premises, monitoring staff access, auditing and network segregation for sensitive information store electronically.

While we take reasonable steps to ensure your personal information is protected from loss, misuse and unauthorised access, modification or disclosure, security measures over the internet can never be guaranteed.

We encourage you to play an important role in keeping your personal information secure, by maintaining the confidentiality of any passwords and account details used on our website.

9 Accessing or correcting your personal information

If you would like to access your personal information, please contact us using the details below. In certain circumstances, we may not be able to give you access to your personal information in which case we will write to you to explain why we cannot comply with your request.

We try to ensure any personal information we hold about you is accurate, up-to-date, complete and relevant. If you believe the personal information we hold about you should be updated, please contact us using the details below and we will take reasonable steps to ensure it is corrected, having regard to the purpose for which the information is held and may lawfully be used.

10 Destroying or de-identifying personal information

We destroy or de-identify personal information when we no longer need it, unless we are otherwise required or authorised by law to retain the information.

11 Making a complaint

If you believe your privacy has been breached or you have a complaint about our handling of your personal information, please contact us using the details below.

We take privacy complaints seriously. If you make a complaint, we will respond within 5 days to acknowledge your complaint. We will try to resolve your complaint within 20 working days. When this is not reasonably possible, we will contact you within that time to let you know how long we will take to resolve your complaint.

We will investigate your complaint and write to you to explain our decision as soon as practicable.

If you are not satisfied with our decision, you can refer your complaint as follows:

- if you are based in Australia, you can refer your complaint to the Office of the Australian Information Commissioner by phone on 1300 363 992 or online at www.oaic.gov.au.
- if you are based in New Zealand, you can refer your complaint to the New Zealand Privacy Commissioner by phone on 0800 803 909 or online at www.privacy.org.nz.

12 Changes

We may, from time to time, amend this Policy. Any changes to this Policy will be effective immediately upon the posting of the revised Policy on our website. By continuing to use the services following any changes, you will be deemed to have agreed to such changes. We recommend you visit this site from time to time to keep up to date with any changes.

13 Contact us

The address for LAB, as the agency collecting and holding your information in accordance with this policy, is Duckboard House, Level 2, 91-93 Flinders Lane, Melbourne VIC 3000, Australia.

All questions or queries about this Policy and complaints should be directed to:

Chief of Staff

Phone: 1300 554 233 (within Australia) or +61 (3) 9935 9418 (outside Australia).

Email: enquiries@labgroup.com.au

This Policy was last updated in December 2022.

GDPR Privacy Notice

LAB Group

1 Overview

LAB Group Services Pty Ltd (**collectively, LAB, we, us, our**) is committed to protecting your privacy. We have prepared this GDPR Privacy Notice to describe to you our practices regarding personal information we collect from users of our services, including our LAB Platform service, website at www.labgroup.com, and all other services provided by LAB (**Services**).

Generally, we will process a LAB Platform user's Personal Information on behalf of one of our customers of our Services (**Customer**), who provide financial or investment products or services to that end user.

Our primary privacy obligations are derived from Australian law. Our Privacy Policy, available on our website, sets out how we comply with these obligations. Sometimes, we also handle the information of EU citizens or share data with other organisations which do so or provide services to individuals located in the EU. To the extent that we do so, this GDPR Privacy Notice for EU General Data Protection Regulation applies.

The processing of Personal Information will always be in line with the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth), the General Data Protection Regulation (**GDPR**), and in accordance with country-specific data protection regulations and other applicable to LAB.

We have implemented a number of technical and organisational measures to ensure the most complete protection of Personal Information processed through the Services.

2 Your rights

The GDPR provides you with eight key rights, being the right to:

- Be informed: anyone processing your data must make clear what they are processing, why and who else the data may be passed to.
- Access: the right to access what data is held about you.
- Rectification: the right to have your data corrected or amended if what is held is incorrect.
- Erasure: the right to ask for your personal data to be deleted, also known as the right to be forgotten, if permitted under applicable laws.
- Restrict processing: the right to require a temporary halt to the processing of personal data.
- Data portability: the right to request for any data supplied by you to us to be provided in a structured, commonly used and machine-readable format.
- Object: the right to object to further processing of your data which is inconsistent with the primary purpose for which it was collected.
- Consider automated decision making and profiling: the right not to be subject to a decision based solely on automated processing.

This Privacy Notice sets out, among other things, how you can exercise these rights when dealing with LAB.

3 User Consent

Where we rely on your consent as the lawful basis to process your data under the GDPR we will always ask for you to positively affirm your acceptance. By clicking to accept this Privacy Notice, you acknowledge and agree to be bound by this Privacy Notice.

We note that all contact or other data forms where consent is required to be given by you include no pre-checked checkboxes so that you are able to freely, affirmatively opt-in. We will also provide you with notice on the Services specifically detailing what it is that you are consenting to in clear and plain language as well ensuring that each matter that requires consent is clearly distinguishable.

For all areas of the Services where consent is given it is just as easily able to be withdrawn through the appropriate account settings on the Services or by contacting us at the details provided below.

If you believe that consent has not been given freely or in breach of the terms of this Privacy Notice, please contact us.

4 Personal Information we collect

We will only collect Personal Information from you if it is reasonably necessary for one or more of our functions or activities.

Personal Information means any information that allows someone to identify you, including, for example, your name, telephone number, e-mail address, date of birth, as well as any other non-public information about you that is associated with or linked to any of the foregoing data.

4.1 Information you provide to us

a. Account and User Content

You need to create an account with us to use some of our Services.

During your account registration and use of the Services, you may enter your details on different forms or provide us with additional content.

We may collect Personal Information from you, such as:

- your name, email address and phone number;
- gender;
- date of birth;
- your nationality and which countries you hold citizenship of;
- details of your employment, including the company you work for and your job title;
- your nationality and which countries you hold citizenship of;
- any photos (such as photo identification) that you upload. This data is used to enable us to identify and verify you and provide you with support, services, mailings, sales and marketing actions. Certain functionality of the Services requires your Personal Information to function properly.

When you create or share content, or upload content such as photos, comments, meta data (geographic tags) we may also collect this data.

The legal basis for this processing is based on:

- your consent through your voluntary submission of the form and agreeing to these terms;
- the Personal Information being necessary for the performance of a contract to which you are a party;
- for carrying out pre-contractual measures; and/or
- any other legitimate interests as detailed below.

a. Contact Data

If you provide us feedback or contact us via e-mail, or other means including by phone call or by contracting with us, we will collect your name and e-mail address, as well as any other content

included in the e-mail or conversation, in order to send you a reply. We will store and process your communications and information as needed. We may also collect contact information if you choose to upload, sync or import it from a device.

The legal basis for this processing is based on:

- either through your consent through your voluntary submission of the form and agreeing to these terms or by your voluntary submission of data to us in other means;
- the Personal Information being necessary for the performance of a contract to which you are a party;
- for carrying out pre-contractual measures; and/or
- any other legitimate interests as detailed below.

By submitting a form or contacting us, such Personal Information is transmitted on a voluntary basis and you consent to its collection.

b. Subscription Data

When you use the Services, you may have the ability to subscribe to our newsletters or other forms. We may collect the data when you input your details for subscription purposes.

The Personal Information is processed for the purpose of informing you regularly by means of a newsletter or other offer form. The personal information collected during the subscription will only be used for marketing materials or for reasons made known on the form.

The legal basis for this processing is based on:

- your consent through your voluntary submission of the form and agreeing to these terms; and/or
- any other legitimate interests as detailed below.

By submitting the form and voluntarily providing us with your data, you are providing consent to the use of such data by us for the purpose of providing subscription based materials. For the purpose of revocation of consent there is a corresponding unsubscribe link found in each subscription email. You also contact us at enquiries@labgroup.com.au to revoke your consent. Please review the consent section above in this Privacy Notice for how we deal with consent. Where we use your data for direct marketing, we will ensure that it is in compliance with relevant laws. Where you are a customer of ours, we may be required to send you emails for legitimate reasons including but not limited to billing, reminders and account verification.

We retain information on your behalf, such as domain names, URLs, time zone preferences, transactional history, messages and any other information that you use LAB Platform.

We may also collect Personal Information at other points on our Services. These points state that Personal Information is being collected. In some circumstances, Personal Information is provided to us by third parties such as our related entities, service providers or other organisations conducting activities on your behalf. With your express consent, your Personal Information may be used and disclosed to us this way. The purposes as outlined above may include the processing of such Personal Information to the extent necessary for us to comply with a law, regulation or legal request or to protect the safety of any person or to prevent fraud.

4.2 Information we collect as you use our services

a. Meta Data including Location Data

Some of our Services (including LAB Platform) may allow you to add or may have metadata added to your content including hashtags (to mark keywords), geotags (to mark your location), comments or other data. This helps our Services and your content to be more searchable.

We use location data to help target and tailor the Services to your particular location and jurisdiction. With your consent, we may also collect information about your precise location using methods including GPS, wireless networks, cell towers, Wi-Fi access points and other sensors.

b. Log Data

To make our Services more useful to you, our servers (which may be hosted by a third-party service provider) gather information automatically and store it in log files. This information includes Internet Protocol (**IP**) addresses, browser type and language, Internet service provider (**ISP**), referring and exit websites and applications, operating system, date/time stamp, and clickstream data.

We use this information to understand and analyse trends, to administer the Services, to learn about user behaviour regarding the Services, to improve our product and services, and to gather demographic information about our user base as a whole. LAB may use this information in our marketing and advertising services.

In some of our email messages, we use a “click-through URL” linked to content on our Services. When customers click one of these URLs, they pass through a separate web server before arriving at the destination page on our website. We track this click-through data to help us determine interest in particular topics and measure the effectiveness of our customer communications. If you prefer not to be tracked in this way, you should not click text or graphic links in the email messages.

c. Analytics

We use third party analytics tools to collect information anonymously and report website trends without identifying individual visitors. These tools collect information sent by your device or our Services, including the web pages you visit, add-ons, and other information that assists us in improving the Services.

4.3 Information we collect from others

d. Data and content other people upload

We may also collect information and communications that other people provide when they use our Services. This can include information about you such as when others send messages, documents and information to you. If you are an employee of a business, this might include information that your employer provides to us. We may also collect your information if you are invited to participate in our Services. This may include information such as your name, phone number and email address relevant to the Services and is used for the purpose of enabling us to provide our Services to you.

We will only collect information about you directly from you, except where it is unreasonable or impracticable to do so.

5 How we use your Personal Information

5.1 Use of personal information

We will only use or disclose your personal information for the purposes for which we advised you we were collecting it for as noted in this Privacy Notice and including to:

- enable you to access and use LAB Platform, our website and associated applications;
- maintain internal records and administrative purposes;
- to comply with our legal obligations and resolve any disputes that we may have;
- maintain your account and contact details;
- remember information so you don't have to re-enter it during your visit or the next time you visit the Service;
- provide personalised content and information to you and others;

- send marketing communications to you;
- conduct our business, generate content and provide customer support and payment options (including updates and improvements);
- administer contracts including to negotiate, execute and/or manage a contract with you;
- communicate with you;
- provide you with access to protected areas of the website or other Services;
- conduct surveys to determine use and satisfaction;
- detect, investigate and prevent potentially unlawful acts or omissions or acts or omissions with the potential to breach our Terms and Conditions, this Privacy Notice or any other policy;
- enforce our Terms and Conditions, this Privacy Notice or any other policy;
- verify information for accuracy or completeness;
- comply with our legal obligations;
- monitor metrics;
- combine or aggregate your personal information with information we collect from third parties and use it for the purposes set out in this Privacy Notice;
- protect a person's rights, property or safety;
- process transactions to which you are a party;
- resolve disputes and to identify, test and resolve problems;
- improve our Services; and
- any other purpose made known in this Privacy Notice or other policy.

We agree to not use or disclose this information for a secondary purpose unless you consent to us doing so, or another exception applies under applicable laws.

For the purposes of the law, some information we hold about you may be considered 'sensitive' as a special category of data and therefore subject to greater protection. In the event that we hold sensitive information about you, we will only disclose or use that information with your consent or if another exception applies under applicable laws.

We will also use or disclose your personal information or sensitive information if we are required to do so by law or a court / tribunal order, or if we reasonably believe that the use or disclosure of the information is reasonably necessary for an enforcement related activity or on behalf of an enforcement body, in which case we will make a written note of the use or disclosure or another exception applies under relevant laws.

5.2 Creation of anonymous data

We also collect data in a form that does not, on its own, permit direct association with any specific individual. We may collect, use, transfer, and disclose non-personal information for any purpose.

We may collect information regarding customer activities on our Services including the website. This information is aggregated and used to help us provide more useful information to our customers and to understand which parts of our website, products, and Services are of most interest. Aggregated data is considered non-personal information for the purposes of this Privacy Notice.

6 Disclosure of your Personal Information

We may disclose your Personal Information to third parties for the purposes contained in this Privacy Notice, either on our own behalf or on behalf of our Customers, including without limitation to:

a. Service Providers

We may share your Personal Information with service providers to:

- provide you with the Services that we offer you;
- to conduct quality assurance testing;
- to facilitate creation of accounts;
- to provide technical support;
- and/or to provide other services to LAB.

The service providers (and if necessary, data processors) include:

- businesses that provide integrated services in LAB Platform, including electronic identify verification services;
- information technology service providers such as web host providers and analytical providers;
- mailing houses;
- advertising partners;
- market research organisations to enable them to measure the effectiveness of our advertising; and
- specialist consultants.

These third party service providers are required not to use your Personal Information other than to provide the services requested by LAB.

b. Affiliates and Acquisitions

We may share some or all of your Personal Information with any of our parent companies' subsidiaries, joint ventures, or other companies under a common control (**Affiliates**), in which case we will require our Affiliates to honour this Privacy Notice. In the event we are involved in a merger, acquisition or sale of assets we may disclose Personal Information collected by us to such entities that we propose to merge with or be acquired by and will assume the rights and obligations regarding your Personal Information as described in this Privacy Notice. This includes the disclosure of information to our clients where we act as a data processor.

c. Third parties including those you choose to share your data with

We may disclose your Personal Information to third parties to whom you expressly ask to us to send the Personal Information to or to third parties you choose to send your Personal Information to. This includes to the Customers that you interact with through LAB Platform.

We may also, with your consent or at your direction, disclose your personal information to your authorised representatives.

d. Other disclosures

Regardless of any choices you make regarding your Personal Information (as described below), LAB may disclose Personal Information if it believes in good faith that such disclosure is necessary:

- (i) in connection with any legal investigation;
- (ii) to comply with relevant laws, regulations, enforceable governmental requests or to respond to subpoenas or warrants served on LAB;
- (iii) to protect or defend the rights or property of LAB or users of the Services;
- (iv) to investigate or assist in preventing any violation or potential violation of the law, this Privacy Notice, or our Terms and Conditions;
- (v) to protect the safety of any person or to protect the safety or integrity of our platform including for security reasons; or

- (vi) detect, prevent or otherwise address fraud, security or technical issues.

We may share your Personal Information with such third parties subject to obligations consistent with this Privacy Notice and any other appropriate confidentiality and security measures, and on the condition that the third parties use your Personal Information only on our behalf and pursuant to our instructions.

We will take reasonable steps to ensure that anyone to whom we disclose your personal information respects the confidentiality of the information and abides by the GDPR or equivalent privacy laws.

We will not share, sell, rent or disclose your personal information in ways different from what is disclosed in this Privacy Notice.

Where we act as a data processor, our client may also provide us with instructions with regard to disclosure.

7 If we can't collect your data

If you do not provide us with the personal information described above, some or all of the following may happen:

- we may not be able to provide our Services to you, either to the same standard or at all;
- we may not be able to run the competitions and promotions in a way that benefits you;
- we may not be able to provide you with information about products and services that you may want; and/or
- we may be unable to tailor the content of our Services to your preferences and your experience of our Services may not be as enjoyable or useful.

8 Cookies Policy

8.1 What are cookies?

A cookie is a small piece of text sent to your browser by a website that you visit. It helps the website to remember information about your visit, like your preferred language and other settings. That can make your next visit easier and the site more useful to you. Cookies play an important role. Without them, using the web would be a much more frustrating experience.

8.2 Use of cookies

LAB's Services, including websites, online services, email messages, and advertisements, may use "cookies" and other technologies such as pixel tags and web beacons. These technologies help us better understand user behaviour, tell us which parts of our websites people have visited, and facilitate and measure the effectiveness of advertisements and web searches.

We treat information collected by cookies and other technologies as non-personal information. However, to the extent that Internet Protocol addresses or similar identifiers are considered personal information by local law, we also treat these identifiers as personal information. Similarly, to the extent that non-personal information is combined with personal information, we treat the combined information as personal information for the purposes of this Privacy Notice.

LAB and our partners also use cookies and other technologies to remember personal information when you use our Services. Our goal in these cases is to make your experience with LAB more convenient and personal. For example, knowing your first name lets us welcome you the next time you visit the LAB platform. Knowing someone using your computer or device has shopped for a certain product or used a particular service helps us make our advertising and email communications more relevant to your interests. And knowing your contact information, hardware identifiers, and information about your computer or device helps us personalize your operating system and provide you with better customer service.

Pixel tags enable us to send email messages in a format customers can read, and they tell us whether mail has been opened. We may use this information to reduce or eliminate messages sent to customers.

8.3 How to manage cookies

Some people prefer not to allow cookies, which is why most browsers give you the ability to manage cookies to suit you. If you want to disable cookies and you're using the Safari web browser, go to Safari preferences and then to the privacy pane to manage your preferences. For other browsers, check with your provider to find out how to disable cookies. Please note that certain features of the LAB Services may not be available once cookies are disabled.

9 Third party websites

When you click on a link to any other website or location, you will leave our website and go to another site and another entity may collect Personal Information or Anonymous Data from you. We have no control over, do not review, and cannot be responsible for, these outside websites or their content. Please be aware that the terms of this Privacy Notice do not apply to these outside websites or content, or to any collection of data after you click on links to such outside websites.

10 Managing your Personal Information

Subject to the GDPR you may request to access the personal information we hold about you by contacting us. All requests for access will be processed within a reasonable time. We may work with our Customers that act as data controllers to satisfy your request.

In most cases we act as a **data processor**, on behalf of our Customer and in accordance with their instructions. This means that should you wish to access, review, correct, transfer, modify or delete any Personal Information we process on behalf of that Customer, you can also contact the Customer with your request.

a. Accessing or rectifying your Personal Information

We may, if required, provide you with tools and account settings to access, correct, delete, or modify the Personal Information you provided to us. You can find out more about how to do this by contacting us. In the event that you are unable to access your Account to access or rectify your Personal Information, you may submit a request to us to correct, delete or modify your Personal Information and download the data for you.

b. Deletion

We keep data for as long as it is needed for our operations. If you deactivate and delete your Account, your data will no longer be visible on your Account. Please keep in mind that third parties may still retain copies of information you have made public through our Services.

If you wish to have us delete your data, please contact us or the Customer who originally facilitated your access to the Services.

c. Object, restrict or withdraw consent

You may manually submit a request to us if you object to any Personal Information being stored, or if you wish to restrict or withdraw any consent given for the collection of your Personal Information.

You may withdraw your consent to the processing of all your Personal Information at any time. If you wish to exercise this right, you may do so by contacting us.

You may withdraw your consent or manage your opt-ins by either viewing your account on the Services or clicking the unsubscribe link at the bottom of any marketing materials we send you.

d. Portability

We may, if required and possible, provide you with the means to download the information you have shared through our services. Please contact us for further information on how this can be arranged.

In certain instances, we may not be required or able to provide you with access to your Personal Information. If this occurs, we will give you reasons for our decision not to provide you with such access to your Personal Information in accordance with the requirements of the GDPR.

There is no application fee for making a request to access your personal information. However, we may charge an administrative fee for the provision of information in certain circumstances, such as if you make repeated requests for information or where the information is held by a third-party provider.

11 Storage and Security of Your Personal Information

LAB stores Personal Information by utilising services provided by Agility Applications and Amazon Web Services (AWS). LAB protects Personal Information by implementing encryption, firewalls and login password protocols, secure and access-controlled premises, monitoring staff access, auditing and network segregation for sensitive information store electronically..

LAB takes the security of your personal information very seriously. We will take all steps reasonable under the circumstances to protect your personal information from misuse, interference, loss; and unauthorised access, modification or disclosure. We will process Personal Information securely and apply and maintain appropriate technical and organisational measure to protect Personal Information.

Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that personal information that we collect will not be disclosed in a manner that is inconsistent with this Privacy Notice.

12 International Transfer and Disclosure of Personal Information

Where we transfer Personal Information from within to outside of the European Union or EFTA States, we ensure an adequate level of protection for the rights of data subjects based on the adequacy of the receiving country's data protection laws.

We may disclose personal information to our related bodies corporate and third-party suppliers and service providers located overseas for some of the purposes listed above. We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

13 Notifiable Data Breaches

We take data breaches very seriously. We will endeavour to meet the 72-hour deadline as imposed by the GDPR, to report any data breach to the supervisory authority where a data breach occurs that will likely be a risk to you. Further, where there is likely to be a high risk to your rights, we will endeavour to contact you without undue delay. We will review every incident and take action to prevent future breaches.

14 Automated individual decision-making, including profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you, or similarly significantly affects you, as long as the decision is not necessary for entering into, or the performance of, a contract between us, or is not authorised by Union or Member State law to which we are subject and which also lays down suitable measures to safeguard your rights and freedoms and legitimate interests, or is not based on your explicit consent. If you wish to exercise your rights, please contact us.

15 Integrity and Retention of Data

We take all reasonable steps to ensure that the personal information we collect about you is accurate, up to date and complete. Where we collect that information from you directly, we rely on you to supply accurate information. LAB makes it easy for you to keep your personal information accurate, complete, and up to date. Where we use or disclose your personal information, we will also ensure that your personal information is relevant.

We will retain your personal information for the period necessary to fulfil the purposes outlined in this Privacy Notice unless a longer retention period is required or permitted by law.

We may retain your information for fraud prevention or similar purposes.

16 Contact Information

LAB welcomes your comments or questions regarding this Privacy Notice.

If you have a question regarding this Privacy Notice or you would like to make a complaint, please contact us by email by using the details below.

If you reside in the European Union of EFTA States, the data controller that is responsible for your Personal Information is:

Lab Group Pty Ltd

ACN 609 658 531

Phone: +61 3 9935 9418

Email: enquiries@labgroup.com.au

Address: Duckboard House, Level 2, 91-93 Flinders Lane, Melbourne VIC 3000, Australia.

If you wish to raise a concern about our use of your information you have the right to do so with your local supervisory authority.

17 Changes to this Privacy Notice

This Privacy Notice is subject to occasional revision and LAB reserves the right, at its sole discretion, to modify or replace any part of this Agreement. It is your responsibility to check this Agreement periodically for changes. Continued use of our Services including LAB Platform and the website shall indicate your acknowledgement of that it is your responsibility to review the Privacy Notice periodically and become aware of any modifications. We may amend this policy from time to time. Not all changes to our Privacy Notice will require your consent, for example where office security procedures are changed. We will notify you of any change to our information handling policy that requires your consent before being implemented.

Contact

Phone: +61 3 9935 9418

Email: enquiries@labgroup.com.au



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