

JobTetris Pty Ltd (ACN: 84 671 446 414) PRIVACY POLICY

BY ACCESSING AND USING OUR SERVICES, YOU ARE AGREEING TO BE BOUND BY THIS AGREEMENT. IF YOU DO NOT AGREE TO ANY CONTENT WITHIN THIS AGREEMENT, YOU MUST NOT ACCESS OR USE OUR SERVICES.

1. BACKGROUND

- 1.1 The privacy of your personal information is afforded the highest level of importance JobTetris Pty Ltd (ACN: 84 671 446 414) (**Company**) and its related entities.
- 1.2 This privacy policy (**Privacy Policy**) sets out how the Company and its related bodies corporate (**Data Controller, we, our and us**) collects, stores, uses, protects, shares and discloses your personal information. This Privacy Policy applies to the provision of our services and in any circumstances where we collect, use or process personal information or sensitive information (**Services**). By visiting or using our Services or providing to us your personal information you agree to the collection, storage, usage and disclosure of your personal information by us in the manner described in this Privacy Policy.
- 1.3 From time to time we will review our Privacy Policy. We will notify you about any changes to our Privacy Policy at any time by posting an updated version of the Privacy Policy on our web site located at www.jobtetris.com. We do not make any representations about any third party web platforms which may be accessed through our website or through the use of the Services.
- 1.4 We will refer to the following collectively as the **Privacy Laws**:
 - (a) *Privacy Act 1998* (Cth) (**Privacy Act**); and
 - (b) Australian Privacy Principles (**APPs**)
- 1.5 The processing of personal information by us will always be in line with the Privacy Laws relevant and applicable to you.
- 1.6 We have implemented a number of technical and organisational measures to ensure the protection of personal information processed through our Services.
- 1.7 This Privacy Policy sets out our information handling procedures and the rights and obligations that both you and we have in relation to your personal information. In the event of any inconsistency, the legislative requirements will override the provisions of this document.

2. USER CONSENT

- 2.1 Where we rely on your consent either expressly or impliedly as the lawful basis to the collection and processing of your data under the Privacy Law we will generally ask you to positively affirm your acceptance of our Privacy Policy.
- 2.2 For all areas of the Services where consent is given it is just as easily able to be withdrawn by contacting us.

3. WHO CAN USE THE WEB PLATFORM

- 3.1 We endeavour to make our Services available to as many people as possible.
- 3.2 Use of the Services if you are under the age of 18 is subject to the consent of your parent or legal guardian. As such, if you are under the age of 18, you must ensure that a parent or legal guardian has reviewed and discussed the terms of this Privacy Policy with you. If you become aware that a person under the age of 18 has provided us with information or information has been collected without parental or guardian consent, please report this using the 'contact us'

function on our website. Any information provided that is in breach of this provision will be deleted, removed and disposed of in accordance with this clause.

- 3.3 The Company reserves the right to not admit or provide Services to any person for any reason including if the location of the person indicates that the Company may not be able to comply with jurisdictional requirements for the collection of personal information or sensitive information.

4. PERSONAL INFORMATION WE COLLECT

- 4.1 We will, from time to time, receive and store personal information you enter onto our website, provided to us directly or given to us in other forms including by third parties.

- 4.2 We collect, receive and store such personal information including but not limited to:

- (a) your contact information, including full name, date of birth, gender, residential addresses, geographical location, telephone and facsimile numbers, social media handles and email addresses;
- (b) data relating to your activity on our Services, including if you are a user of our platform and information about you is inputted as part of its functionality, and/or via tracking technologies such as cookies;
- (c) relevant codes, passwords or entry access information in the event they may be required to render the completion or works and services.

- 4.3 We generally do not collect, receive and store your sensitive information. You should avoid disclosing to us any sensitive information which is not necessary to disclose. There may be instances where specific sensitive information is collected by us in providing the services, we will only collect this information where:

- (a) you consent to us collecting and processing your sensitive information by you voluntarily providing this sensitive information to us by uploading that sensitive information; or
- (b) there is another legal basis for us to collect and process your sensitive information.

- 4.4 We may collect additional information at other times, including but not limited to:

- (a) when you provide feedback;
- (b) change your content or email preference;
- (c) respond to surveys and/or promotions;
- (d) communicate with our customer support.

- 4.5 The legal basis for the above processing is based on:

- (a) your consent;
- (b) for the performance of a contract (including steps to conclude a contract);
- (c) legal obligations;
- (d) vital interest of the data subject or another individual;
- (e) task of public interest;

- (f) legitimate interest of the Data Controller; and/or
- (g) any other legitimate interests as permitted by this Privacy Policy or the Privacy Law from time-to-time.

5. COLLECTION

- 5.1 We will only collect personal information where it is reasonably necessary to do so for the conduct of our business and to provide to you the Services. Any collection of personal information by us will be fair and lawful and will not be intrusive.
- 5.2 We will collect personal information about you in the following ways:
- (a) if you provide your information by telephone, post, email or facsimile, through our website, or in person;
 - (b) if you contact us via email or submit your information through our website on our "Contact Us" webpage located at www.jobtetris.com
 - (c) if you establish an account on our website or any affiliated website;
 - (d) if you require us to provide Services to you; and/or
 - (e) if during the course of using our Services either you or a third party input information about you, as part of its functionality.
- 5.3 In order to maintain and continue to improve our website, Services and user experience, we may automatically collect information about how you use our website, the areas of our website that you visit, as well as information about your computer or mobile device including your IP address, device ID, physical location, browser and operating system type, and referring URLs, via cookies and other tracking technologies. Some of the information we collect may be anonymous and/or aggregated, while other information may be personal information. We may also collect information about you through analysing your actions with electronic communications we send to you from time to time, including your opening of such communications and clicking on included links. This information is necessary for providing personalised and location-based content as well as for analysing the use of resources, troubleshooting problems, preventing fraud, and improving our services. We may combine this information with information in your account to help prevent fraud. Any information collected, stored and analysed by us helps us to build our product and ensure the best user experience possible.
- 5.4 In the course of operating our business, we may collect personal information from third parties such as advertisers and mailing lists.
- 5.5 If we collect personal information about you from a third party in circumstances outside the input requirements associated with our Services we will, where appropriate, request that the third party inform you that we are holding such information, how we will use and disclose it, and that you may contact us to gain access to and correct and update the information.
- 5.6 When we collect personal information from you, we will take reasonable steps to notify you or ensure you are aware of:
- (a) our identity and contact details;
 - (b) that we have collected your personal information, and whether that collect is required or authorised by law;
 - (c) the purposes of collection;

- (d) the consequences if personal information is not collected (such as if this will affect our ability to provide the Services to you);
- (e) our usual disclosures of personal information of the kind collected;
- (f) information about this Privacy Policy; and
- (g) whether we are likely to disclose personal information to overseas recipients, and if practicable, the relevant countries in which they are located.

5.7 Some information referred to in clause 5.6 above is included in this Privacy Policy.

6. HOLDING OF PERSONAL INFORMATION

6.1 We will hold personal information as either physical records, records on our servers, records in cloud storage, and in some cases, records on third party servers or cloud storage facilities, which may be located overseas.

6.2 We take active steps to hold all hard copy and electronic records of personal information in a secure manner to ensure that they are protected from misuse, interference, loss, and any unauthorised access, modification or disclosure.

6.3 We have procedures in place to destroy or de-identify personal information once it is no longer needed for a valid purpose or required to be kept by law.

6.4 If you require further information about these procedures, please contact us through the website 'Contact Us' feature and we will respond to your queries promptly.

7. USE OF PERSONAL INFORMATION

7.1 We will only use or disclose your personal information for the purposes for which we advised you we were collecting it for (which are set out as follows and otherwise in this Privacy Policy) or a related purpose which would reasonably be expected or otherwise with your permission.

7.2 Generally we will use your personal information:

- (a) to operate our website and provide the Services to you, generate content and provide customer support (including updates and improvements);
- (b) for our administrative, marketing (including direct marketing), planning, product or service development, quality control, survey and research purposes;
- (c) to provide, administer, market and manage our business, including but not limited to, providing you with our Services and to enhance your experience;
- (d) to provide you with access to protected areas of the site and to authenticate your account;
- (e) to conduct surveys to determine use and satisfaction with our Services;
- (f) to enforce any contract with you or third-parties, this Privacy Policy or any other policy related to us or our website.
- (g) to verify your information for accuracy or completeness (including by way of verification with third parties);
- (h) to comply with our legal obligations, a request by a governmental agency or regulatory authority or legally binding court order;

- (i) to combine your personal information with information we collect from third parties and use it for the purposes set out this Privacy Policy;
- (j) to aggregate and/or make anonymous your personal information, so that it cannot be used, whether in combination with other information or otherwise, to identify you;
- (k) to resolve disputes and to identify, test and resolve problems;
- (l) to notify you about updates, improvement and changes to our Services we provide from time to time; and
- (m) to protect a person's rights, property or safety;

7.3 The website may make third party social media features available to its users. We cannot ensure the security of any information you choose to make public in a social media feature. Also, we cannot ensure that parties who have access to such publicly available information will respect your privacy.

7.4 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.

8. DISCLOSURE OF PERSONAL INFORMATION

8.1 In order to provide to you the Services, we are required to disclose your personal information to:

- (a) recruiters; and
- (b) employers,

you have specifically engaged with through the web platform.

8.2 By engaging in the connection process, you agree that we may share the information in your profile with the relevant recruiter and employer and that your personal information may be stored in:

- (a) the recruiter's platform;
- (b) the employer's employee management software,

8.3 We do not take responsibility for the security of your personal information stored by the recruiter or the employer outside of the Company's platforms.

8.4 We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this Privacy Policy.

8.5 We may disclose your information, including your personal information, to third parties for the purposes contained in this Privacy Policy (including those listed above), including but not limited to:

(a) **Affiliates and Acquirers**

We may share some or all of your personal information with our subsidiaries, or other companies under a common control ("**Affiliates**"), in which case we will require our Affiliates to honour this Privacy Policy. 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

Policy. This includes the disclosure of information to our clients where we act as a data processor.

(b) **Third parties and others you choose to share 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 others you directly or indirectly choose for us to disclose your personal information to.

- 8.6 We may from time to time need to disclose personal information to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, in the course of a legal proceeding or in response to a law enforcement agency request.
- 8.7 We may also use your personal information to protect the copyright, trademarks, legal rights, property or safety of us, our applications, website and customers or third parties.
- 8.8 Information we collect may from time to time be stored, processed in or transferred between parties located in countries outside of Australia.
- 8.9 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 Privacy Laws or equivalent privacy laws.
- 8.10 We will not share, sell, rent or disclose your personal information in ways different from what is disclosed in this Privacy Policy.

9. IF WE CANNOT COLLECT YOUR PERSONAL INFORMATION

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

- (a) We may not be able to provide the Services to you, either to the same standard or at all;
- (b) We may not be able to provide you with information about Services that you may require; or
- (c) We may be unable to tailor the Services to your needs.

10. SECURITY OF PERSONAL INFORMATION

We are committed to ensuring that the information you provide to us is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable procedures to safeguard and secure information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure. The transmission and exchange of information is carried out at your own risk. We cannot guarantee the security of any information that you transmit to us or receive from us. 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 Policy.

11. COMPLAINTS ABOUT PRIVACY

If you have any complaints about our privacy practices, please feel free to send in the details of your complaints to support@jobtetris.com. We take complaints very seriously and will respond shortly after receiving written notice of your complaint.

12. COOKIES POLICY

- 12.1 We may use cookies and URL information to gather information regarding the date and time of your visit and the information for which you searched and which you viewed. "Cookies" are small pieces of information that a website sends to your computer's hard drive while you are viewing a web site. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our website. Persistent Cookies can be removed by following internet browser help file directions. Cookies may enable automatic logins when you visit in the future and may enable content customisation.
- 12.2 Cookies may collect and store your personal information. This Privacy Policy applies to personal information collected via Cookies. You consent and acknowledge that we collect your personal information through Cookies.
- 12.3 We sometimes use Cookies to show remarketing communications via third party networks like Google Display network and Facebook.
- 12.4 You can control and/or delete cookies manually as you wish.

13. MANAGING YOUR PERSONAL INFORMATION

13.1 Accessing your personal information

- (a) You may request details of personal information that we hold about you in accordance with the provisions of the relevant Privacy Law. A small administrative fee may be payable for the provision of information. If you would like a copy of the information which we hold about you or believe that any information we hold on you is inaccurate, out of date, incomplete, irrelevant or misleading, please email us at support@jobtetris.com. We reserve the right to refuse to provide you with information that we hold about you, in certain circumstances set out in the relevant Privacy Law.
- (b) If we cannot give you access, we will tell you why in writing and how you can make a complaint about our decision.
- (c) If your personal information has been de-identified in a manner consistent with the Privacy Law, we are unable to provide you with access to your personal information.

13.2 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 using the "Contact Us" feature of our website. 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. Rectifications, deletions or modifications will be processed within a reasonable time.

13.3 Deletion

- (a) We keep data for as long as it is needed for our operations. Please keep in mind that third parties may still retain copies of information you have made public through our website.
- (b) If we have de-identified your data in accordance with a Privacy Law, we may be unable to delete this data.
- (c) If you wish to have us delete your data please contact us using the 'Contact Us' feature of the website.

13.4 Object, restrict or withdraw consent

- (a) 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.
- (b) 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 using the 'Contact Us' feature of the website.
- (c) 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.

13.5 Portability

- (a) We may, if required and possible, provide you with the means to download the information you have shared with us. Please use the 'Contact Us' function within the website for further information on how this can be arranged.

14. ANONYMITY AND PSEUDONYMITY

We will allow our users to transact with us anonymously or by using a pseudonym, wherever that is reasonable and practicable. However, this will not be possible if we are required or authorised by law or other instrument to deal with customers who have been appropriately identified, or where it is impracticable for us to deal with.

15. STORAGE AND SECURITY OF PERSONAL INFORMATION

- 15.1 We are committed to protecting the security of your personal information. We (and our third-party service providers) use a variety of industry-standard security technologies and procedures to help protect your personal information from unauthorised access, use or disclosure. We use secure web services to collect your information and we store certain kinds of data in encrypted form.
- 15.2 We follow reasonable technical and management practices to help protect the confidentiality, security and integrity of data stored on our system. While no computer system is completely secure, we believe the measures implemented by us reduce the likelihood of security problems to a level appropriate to the type of data involved.
- 15.3 We encourage you to be vigilant about the protection of your own information when using digital services, such as social media. While we will endeavour to ensure that any relationships, we have with third parties include an appropriate level of protection for your privacy, we will be limited in our ability to control any electronic platform operated by a third party.

16. INTERNATIONAL TRANSFER AND DISCLOSURE OF PERSONAL INFORMATION

- 16.1 Where we transfer personal information outside of Australia, or any other approved, pre-determined geographical location, 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.
- 16.2 We may disclose personal information to our related bodies corporate and third-party 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.
- 16.3 We may disclose your personal information to entities located outside of Australia, including the following:
 - (a) Our related bodies corporate;
 - (b) Our data hosting and other IT service providers, located in various countries; and

(c) Other third-parties located in various foreign countries.

16.4 We may disclose your personal information to entities within Australia who may store or process your data overseas.

17. NOTIFIABLE DATA BREACHES

We take data breaches extremely seriously and notification of data breaches will be applied and conferred in accordance with this clause 17.

- (a) In the event that there is a data breach and we are required to comply with the notification of eligible data breaches provisions in Part IIIIC of the *Privacy Act 1988* (Cth) or any other subsequent sections or legislation which supersede this Part IIIIC, we will take all reasonable steps to contain the suspected or known breach where possible and follow the following process set out in this clause.
- (b) We will take immediate steps to limit any further access or distribution where possible. If we have reasonable grounds to suspect that the data breach is likely to result in serious harm to any individuals involved, then we will take all reasonable steps to ensure an assessment is completed within 30 days of the breach or sooner if possible. We will follow the guide published by the Office of the Australian Information Commissioner (if any) in making this assessment.
- (c) If we reasonably determine that the data breach is not likely to result in serious harm to any individuals involved or any remedial action we take is successful in making serious harm no longer likely, then no notification or statement will be made.
- (d) Where, following an assessment and undertaking remedial action (if any), we still have reasonable grounds to believe serious harm is likely, as soon as practicable, we will provide a statement to each of the individuals whose data was breached or who are at risk. The statement will contain details of the breach and recommendations of the steps each individual should take. We will also provide a copy of the statement to the Office of the Australian Information Commissioner.

18. 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. We make it easy for you to keep your personal information accurate, complete, and up to date. We will retain your personal information for the period necessary to fulfil the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

19. DISCLAIMER – THIRD PARTY LINKS

Our website may contain links to third party webpages, Instagram accounts or other social media pages (**Third Party Pages**), including but not limited to those of third parties for whom we have provided our Services to and you acknowledge and agree:

- (a) This Privacy Policy and any other policy of ours does not apply to Third Party Pages and we recommend you make reasonable efforts to familiarise yourself with the policies contained on third-party pages;
- (b) We are not liable for and you expressly indemnify us for any loss or damage incurred as a result of the failure by Third Party Pages to have in place and provide access to their privacy policy, terms of use or any other company policies or their failure to comply with the Privacy Act or any other applicable laws.

20. CONTACT INFORMATION

We welcome your comments or questions regarding this Privacy Policy.

You can confidentially contact our Support Officer at:

Email: support@jobtetris.com

If we do not resolve your enquiry, concern or complaint to your satisfaction or you require further information in relation to any privacy matters, please contact the Office of the Australian Information Commission at:

Telephone: 1300 363 992

Email: enquiries@oaic.gov.au

Office Address: Level 3, 175 Pitt Street, Sydney NSW 2000

Postal Address: GPO Box 5218, Sydney NSW 2001

Services: www.oaic.gov.au

21. CHANGES TO THIS PRIVACY POLICY

This Privacy Policy is subject to occasional revision and we reserve the right, at our sole discretion, to modify or replace any part of this Privacy Policy. It is your responsibility to check this Privacy Policy periodically for changes as continued use of our Services shall indicate your agreement to our then current Privacy Policy. Not all changes to our Privacy Policy will require your consent, for example where office security procedures are changed. We will notify you of any change to our Privacy Policy that requires your consent before being implemented.

22. GENERAL

This Privacy Policy was last updated on 9 July 2024 by Merton Lawyers of 713 Glenferrie Road, Hawthorn VIC 3122.