

PRIVACY POLICY

GROUPMAP TECHNOLOGY PTY LTD

Introduction

GroupMap Technology Pty Ltd (the "Company") is committed to maintaining robust privacy protections for its users. Our Privacy Policy ("Privacy Policy") is designed to help you understand how we collect, use, and safeguard the information you provide to us and to assist you in making informed decisions when using our Service.

Our policy on data protection and privacy is based on four fundamental principles. They are at the heart of what we do and the decisions we make relating to your personal data:

- **Security:** Highest vigilance and diligence with the way we collect and store clients' personal data.
- **Stewardship:** Own responsibility that comes with processing personal data.
- **Transparency:** Openness, honesty and transparency when processing personal data.
- **Legal Compliance:** Compliance with relevant privacy regulations or requirements.

For purpose of this Privacy Policy:

- **"Site"** refers to the Company's website, which can be accessed at <https://www.groupmap.com/> and <https://www.teamretro.com/> for GroupMap software and TeamRetro software respectively.
- **"Service"** refers to the Company's services accessed via our Site, in which our users access:
 - **"GroupMap"** – an online tool for collaborative brainstorming, decision making and action planning or
 - **"TeamRetro"** – an enterprise-ready online agile retrospective meeting and health check tool for remote teams.
- The terms "we," "us," and "our" refer to the Company.
- "You" refers to our client, whether individual or corporation, as a user of our Service.

By accessing our Service, you accept our Privacy Policy and Terms of Service (found here: <https://www.groupmap.com/terms/> and <https://www.teamretro.com/terms-of-service/>, and you consent to our collection, storage, use and disclosure of your Personal Information as described in this Privacy Policy.

What information do we collect?

Personal information you disclose to us.

In Short: We collect personal information that you provide to us such as name, address, contact information, passwords, payment information, and social media login data.

We collect personal information that you voluntarily provide to us when registering with our Services, expressing an interest in obtaining information about us or our products and services, when participating in activities on using our Services (such as participating in online meetings) or otherwise contacting us. The personal information that we collect depends on the context of your interactions with us and the Sites, the choices you make and the products and features you use.

The personal information we COLLECT can include the following:

- **Name and Contact Data.** We collect your name, email address, postal address, phone number, and other similar contact data.
- **Credentials.** We may store a cryptographically hashed and salted password, password hint, and similar security information used for authentication and account access to our Service.
- **Social Media Login Data.** We provide you with the option to register using social media account details, like your Google, LinkedIn or other social media account. If you choose to register in this way, we will collect the Information described in the section called "Social Logins" below.
- **Payment Data.** We collect data necessary to process your payment if you make purchases, such as your payment instrument number (such as a credit card number), and the security code associated with your payment instrument. All payment data is stored by our payment processor, and you should review its privacy policies and contact the payment processor directly to respond to your questions.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

Information automatically collected.

In Short: Some information – such as IP address and/or browser and device characteristics – is collected automatically when using our Services.

We automatically collect certain information when you visit, use, or navigate our Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Do we use cookies and other tracking technologies?

In Short: We may use cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our [Cookie Policy](#).

- Account related cookies
When you create an account with us, we use cookies for the management of the signup process and general administration. These cookies will usually be deleted when you log out. However, in some cases, they may remain afterwards to remember your site preferences when logged out.
- Login related cookies
We use cookies when you are logged in so that we can remember this fact. This prevents you from having to log in every single time you visit a new page. These cookies are removed or cleared when you log out to ensure that you can only access restricted features and areas when logged in.
- Site preferences cookies
To provide you with a great experience on our site we provide the functionality to set your preferences for how our site runs when you use it. To remember your preferences, we set cookies so that this information can be called whenever you interact with a page that is affected by your preferences.
- Affiliate referral cookies
Several of our partners promote on our behalf and affiliate tracking cookies allow us to see if our customers have come to our site through one of our partner sites so that we can credit them appropriately and where applicable allow our affiliate partners to provide any bonus that they may provide you for making a purchase.
- Third party cookies
We do not collect 3rd party cookies including those in Google Analytics or Google AdSense.

Do we collect information from minors?

In Short: We do not knowingly collect data from or market to children under 13 years of age.

We do not knowingly solicit data from or market to children under 13 years of age. By using the Sites, you represent that you are at least 13 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Site. If we learn that personal information from users less than 13 years of age has been

collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data that we have collected from children under age 13, please contact us at privacy@groupmap.com.

How do we handle your social logins?

In Short: If you choose to register or log in to our websites using a social media account, we may have access to certain information about you.

Our Services offers you the ability to register and login using your third-party social media account details (like your Google or LinkedIn logins). Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile information we receive may vary depending on the social media provider concerned, but will often include your name, e-mail address and profile picture.

We will use the information we receive only for the purposes that are described in this privacy policy or that are otherwise made clear to you on the Services. Please note that we do not control, and are not responsible for, other uses of your personal information by your third-party social media provider. We recommend that you review their privacy policy to understand how they collect, use, and share your personal information, and how you can set your privacy preferences on their sites and apps.

How do we use your information?

In Short: We process your information for purposes based on legitimate business interests, the fulfilment of our contract with you, compliance with our legal obligations, and/or your consent.

We use personal information collected via our Services for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests ("Business Purposes"), to enter into or perform a contract with you ("Contractual"), with your consent ("Consent"), and/or for compliance with our legal obligations ("Legal Reasons"). We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- To facilitate account creation and logon process. If you choose to link your account with us to a third-party account *(such as your Google account), we use the information you allowed us to collect from those third parties to facilitate account creation and logon process. See the section below headed "Social Logins" for further information.
- To send you marketing and promotional communications. We may use the personal information you send to us for our marketing purposes if this is in

accordance with your marketing preferences. You can opt-out of our marketing emails at any time (see the “Your Privacy Rights” below).

- To send administrative information to you. We may use your personal information to send you product, service, and new feature information and/or information about changes to our terms, conditions, and policies.
- To fulfil and manage your orders. We may use your information to fulfil and manage your orders, payments, returns, and exchanges made through the Sites.
- To post testimonials. We post testimonials on our Sites that may contain personal information. Prior to posting a testimonial, we will obtain your consent to use your name and testimonial. If you wish to update, or delete your testimonial, please contact us at privacy@groupmap.com and be sure to include your name, testimonial location, and contact information.
- To request Feedback.
We may use your information to request feedback and to contact you about your use of our Sites.
- To protect our Sites. We may use your information as part of our efforts to keep our Sites safe and secure (for example, for fraud monitoring and prevention).
- To enable user-to-user collaboration. We may use your information in a collaborative space (maps, workspaces, retrospective, or health check meetings) between invited users with each user’s consent.
- To enforce our terms, conditions, and policies.
- To respond to legal requests and prevent harm. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- For other Business Purposes. We may use your information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Sites, products, services, marketing, and your experience.

Will your information be shared with anyone?

In Short: We only share information with your consent, to comply with laws, to protect your rights, or to fulfil business obligations.

We do not sell, trade, rent or otherwise share for marketing purposes your Personal Information with third parties without your consent.

We will only share Personal Information with outside parties if required to meet any applicable legal process or enforceable governmental request; to enforce applicable Terms of Service, including investigation of potential violations; address fraud, security, or technical concerns; or to protect against harm to the rights, property, or safety of our users or the public as required or permitted by law.

We only share and disclose your information in the following situations:

- Other Users

When you share personal information (for example, by posting ideas, comments, or other content to the Services) or otherwise interact within a collaborative space of the Services (such as a map, workshop, retrospective meeting, or health check meeting), such personal information may be viewed by all other invited participants of that collaborative area in perpetuity. Similarly, other users will be able to view descriptions of your activity, communicate with you within our Services, and view your basic profile.

- Compliance with Laws

We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

- Vital Interests and Legal Rights

We may disclose your information where we believe it is necessary to investigate, prevent, or act regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

- Vendors, Consultants and Other Third-Party Service Providers

We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Sites, which will enable them to collect data about how you interact with the Sites over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity. Unless described in this Policy, we do not share, sell, rent, or trade any of your information with third parties for their promotional purposes.

We do share Personal Information with our vendors/sub-processors who are performing services for the Company, such as the servers for our email communications who are provided access to the user's email address for purposes of sending emails from us. Those vendors use your Personal Information only at our direction and in accordance with our Privacy Policy and a signed Data Processing Agreement.

- Business Transfers

We may share or transfer your information in connection with, or during

negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

- **Affiliates**

We may share your information with our affiliates, in which case we will require those affiliates to honour this privacy policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.

- **Referral partners**

Several of our partners promote on our behalf and may receive reports indicating which customers have come to our Services through their own site so that we can credit them appropriately and where applicable allow our affiliate partners to provide any bonus that they may provide you for making a purchase. Those referral partners use your Personal Information only at our direction and in accordance with our Privacy Policy.

- **With your Consent**

We may disclose your personal information for any other purpose with your consent.

How long do we keep your information?

In Short: We keep your information for as long as necessary to fulfil the purposes outlined in this privacy policy unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this policy will require us keeping your personal information for longer than 90 days past the termination of your account.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

How do we keep your information safe?

In Short: We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the services within a secure environment.

We protect your information from potential security breaches by implementing technological security measures including but not limited to encryption, firewalls, and secure socket layer technology. Your data is stored in a top-tier, third-party data hosting provider – Amazon Web Services – with separate environments in the US and the European Union.

For more information about AWS's approach to compliance with GDPR, see <https://aws.amazon.com/compliance/gdpr-center/>.

If you are located in the European Union, please note that Amazon Web Services, Inc., which provides our hosting and information storage services, is fully compliant with the European Union's Data Protection Directive. For more information, please visit <https://aws.amazon.com/privacy/>.

Learn more about our security posture at <https://www.groupmap.com/security> and <https://www.teamretro.com/security>

Is your information transferred internationally?

In Short: We may transfer, store, and process your information in countries other than your own.

Hosting Environment

Our primary servers are located in the United States of America. If you are accessing our Sites from outside the United States of America, please be aware that your information may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your personal information (see "Disclosure of Your Information" above), in the United States of America and other countries.

If you are a resident in the European Economic Area, then these countries may not have data protection or other laws as comprehensive as those in your country. We will however take all necessary measures to protect your personal information in accordance with this privacy policy and applicable law.

EU Hosting Environment

If you want your data to be collected, processed, and stored in the EU, there is a paid option to have your services hosted in the EU-hosted environment with our primary services and data sub-processors located exclusively in EU member-state countries.

Data Processing Agreement

Such measures implement the European Commission's Standard Contractual Clauses for transfers of personal information between our group companies and between us and our third-party providers, which require all such recipients to protect personal

information that they process from the EEA in accordance with European data protection laws. Our Standard Data Processing Agreement can be provided upon request / is available here. We have implemented similar appropriate safeguards with our third-party service providers and partners and further details can be provided upon request.

What is our stance on third-party websites?

In Short: We are not responsible for the safety of any information that you share with third-party providers who advertise, but are not affiliated with, our websites.

As part of our Service, we may provide links to or compatibility with other websites or applications. However, we are not responsible for the privacy practices employed by those websites or the information or content they contain. This Privacy Policy applies solely to information collected by us through the Site and the Service.

Therefore, this Privacy Policy does not apply to your use of a third-party website accessed by selecting a link on our Site or via our Service. To the extent that you access or use the Service through or on another website or application, then the privacy policy of that other website or application will apply to your access or use of that site or application. We encourage our users to read the privacy statements of other websites before proceeding to use them.

What are your privacy rights?

In Short: You may review, change, or terminate your account at any time.

We are relying on your consent to process your personal information, and you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal.

Account Information

You may at any time review or change the information in your account or terminate your account by:

- Logging into your account settings and updating your account.
- Contacting us using the contact information provided below.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our [Terms of Use](#) and/or comply with legal requirements.

Cookies and similar technologies

Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you

choose to remove cookies or reject cookies, this could affect certain features or services of our Services. For further information, please see our [Cookie Policy](#).

Opting out of email marketing

You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list – however, we will still need to send you service-related emails that are necessary for the administration and use of your account. You can also opt-out by:

- Noting your preferences at the time you register your account with the Services.
- Logging into your account settings and updating your preferences.
- Contacting us using the contact information provided below.

If you're not happy with how we are processing your personal data, please contact our Data Protection Officer via privacy@groupmap.com. We will review and investigate your complaint and get back to you within a reasonable time frame.

Do European Economic Area (EEA) and UK residents have specific privacy rights?

In Short: Yes, if you are a resident of the European Economic Area and UK, you are granted specific rights regarding your personal information under GDPR.

You have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information.

We value your privacy and your rights as a data subject and have appointed Prighter Group with its local partners as our privacy representative and your point of contact.



Prighter gives you an easy way to exercise your privacy-related rights (e.g. requests

to access or erase personal data). If you want to contact us via our representative, Prighter or make use of your data subject rights, please visit the following website <https://prighter.com/q/11059092>

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm

Do Australian residents have specific privacy rights?

In Short: Yes, if you are a resident of Australia, you are granted specific rights regarding your personal information under the Privacy Act 1988.

We abide by the Australian Privacy Principles introduced in the Australian Privacy Act 1988. The Act govern standards, rights, and obligations around:

- the collection, use and disclosure of personal information.
- an organisation or agency's governance and accountability.
- integrity and correction of personal information.
- the rights of individuals to access their personal information.

If you are resident in Australia and would like to understand your rights under Australian law, please refer to the Office of the Australian Information Commissioner <https://www.oaic.gov.au/privacy/>

Do California residents have specific privacy rights?

In Short: Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with the Services, you have the right to request the removal of unwanted data that you publicly post on the Services. To request the removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Services, but please be

aware that the data may not be completely or comprehensively removed from our systems.

From 1 January 2023, the California Privacy Rights Act (CPRA) will enter into force to strengthen the privacy rights of Californian consumers.

In addition to data subject rights granted under the CCPA (such as access, deletion, do not sell, and non-discrimination), the CPRA includes additional data subject rights to:

- correct inaccurate personal information
- object not only to the sale but also to the sharing of their personal data
- opt-out of behavioural profiling and automated decision-making
- object to the use of sensitive personal information
- and data portability

Do we make updates to this policy?

In Short: Yes, we will update this policy as necessary to stay compliant with relevant laws.

We may update this privacy policy from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

How can you contact us about this policy?

If you have questions or comments about this policy, email Our Privacy Officer at privacy@groupmap.com or by post to:

Chief Privacy Officer

GroupMap Technology Pty. Ltd.

Level 1/931 Albany Highway

East Victoria Park WA 6101

Australia