

## RightCrowd Privacy Policy

*This Privacy Policy is effective as of June 2018.*

At RightCrowd we recognize the importance of protecting your personal information and are committed to processing it responsibly and in compliance with applicable data protection laws in all countries in which RightCrowd operates. Maintaining your trust is paramount to us.

This Privacy Policy describes RightCrowd's general privacy practices that apply to personal information we collect, use and share about consumers and other individuals within our clients, business partners, suppliers, and other organizations with which RightCrowd has or contemplates a business relationship.

This Privacy Policy also applies to RightCrowd websites that link to this Policy but does not apply to those RightCrowd websites that have their own Privacy Policy. Additionally, it does not apply to instances where we merely process information on behalf of clients for their benefit, such as when we act as a web hosting service provider. We may provide additional or more specific information on the collection or use of personal information on websites or related to a specific product or service.

We may supplement this Policy with additional information relating to a particular interaction we have with you, such as a transaction document or a specific privacy policy when you order or use an online service.

If you have questions or complaints regarding our Privacy Policy or practices, please contact the:

### **RightCrowd Corporate Privacy Office**

Suite 501, Level 5, The Rocket,  
203 Robina Town Centre Drive,  
Robina, Queensland, 4227,  
Australia

Email: [compliance@rightcrowd.com](mailto:compliance@rightcrowd.com)

### **Why and how we collect and use your personal information**

We may collect your personal information as an individual for various purposes, such as the following:

#### **Access and use of websites or other online services**

When entering one of our websites, or using an online service, we will record information necessary to provide you with access, for the operation of the website and for us to comply with security and legal requirements in relation to operating our site, such as passwords, IP address and browser settings. We also collect information about your activities during your visit in order to personalize your website experience, such as recording your preferences and settings, and to collect statistics to help us improve and further develop our websites, products and services.

#### **Responding to your request for information, order, or support**

When you contact us (online or offline) in connection with a request for information, to order a product or service, to provide you with support, or to participate in a forum or other social computing tool, we collect information necessary to fulfil your request, to grant you access to the product or service, to provide you

with support and to be able to contact you. For instance, we collect your name and contact information, details about your request and your agreement with us and the fulfilment, delivery and invoicing of your order and we may include client satisfaction survey information. We retain such information for administrative purposes, defending our rights, and in connection with our relationship with you.

When you provide your name and contact information to register in connection with such a request, the registration may serve to identify you when you visit our websites. For ordering of some services and products, we may require you to have registered a RightCrowd ID. Registration may also allow you to customize and control your privacy settings.

### **Your use of RightCrowd online services**

We collect information about your use of RightCrowd online services to enable product features to operate, improve your user experience, tailor our interactions with you, inform our clients on the overall use of the services, provide support and improve and develop our products and services.

### **Contacting employees of our clients, prospects, partners and suppliers**

In our relationship with clients or prospects, partners and suppliers, they also provide us with business contact information (such as name, business contact details, position or title of their employees, contractors, advisors and authorized users) for purposes such as contract management, fulfilment, delivery of products and services, provision of support, invoicing and management of the services or the relationship.

### **Visitor information**

We may register individuals visiting our sites and locations (name, identification and business contact information) and may use camera supervision for reasons of security and safety of persons and belongings, as well as for regulatory purposes.

## **Collection of Personal Information**

### **Introduction**

You may choose to give us personal information directly in a variety of situations. For example, you may want to give us your name and contact information to communicate with you, to order a product, to process an order, to register for a service, to provide you with a subscription, or to do business with us if you are a supplier or a business partner. You may also provide your credit card details to buy something from us or may share a description of your education and work experience in connection with a job opening at RightCrowd for which you wish to be considered. If you tell us that you do not want us to use your information to make further contact with you beyond fulfilling your request, we will respect your wishes.

### **Your use of RightCrowd online services**

We collect information about your use of RightCrowd online services to enable product features to operate, improve your user experience, tailor our interactions with you, inform our clients on the overall use of the services, provide support and improve and develop our products and services.

## **Registration**

When you wish to receive information, download publications, enroll for a live or virtual event or request a trial, we may ask you to provide your name and business contact information, as well as other information in connection with your request. We use this information in connection with your request and to communicate with you. This information may, in most cases, also identify you when you visit our websites. We will retain your information for potential future interactions with you.

We may also ask you to register a RightCrowd ID, in which case you need to provide us with your name, email address, country location and other information if needed for the purpose for which you are asked to register. The RightCrowd ID serves to uniquely identify you when you visit our websites, have a request or order or use a product or service. For ordering of some services and products we may require you to have registered a RightCrowd ID. Registration with a RightCrowd ID may allow you to customize and control your privacy settings. Certain RightCrowd products and services may require unique registration specifically for the purpose of providing these products or services. In such cases, registration details provided by you for a product or service will only be used for the specific purpose of providing you with that product or service.

## **Website visits and RightCrowd Online services**

We may also collect information relating to your use of our websites and RightCrowd Online services through the use of various technologies. For example, when you visit our websites or access our RightCrowd Online services, we may log certain information that your browser sends us, such as your IP address (including information deriving from your IP address such as your geographic location), browser type, version and language, access time, duration of access, and referring website addresses; we may also collect information about the pages you view within our sites, the time you spent on each site and other actions you take while visiting our website. When you access our website without a RightCrowd ID or signing in, we will still collect some of this personal information in order to enable the websites to function properly.

In addition, some of our software products and RightCrowd Online services include technologies that allow RightCrowd to collect certain information about the use of our products and services. We may also use such technologies to determine whether you've opened an e-mail or clicked on a link contained in an e-mail. For details regarding the technologies we employ, see Cookies, Web Beacons and Other Technologies below.

## **Marketing**

Most information we collect about you comes from our direct interactions with you. When you register for an event we may collect information (online or offline) in relation to the event organization, and during an event, such as participation in sessions and survey results. Events may be recorded and group photos taken. We reserve the right to use photos for promotional use. When you provide us with your business contact information (such as by handing over a business card) we may use this to communicate with you.

We combine the personal information we collect to develop aggregate analysis and business intelligence for conducting our business and for marketing purposes. You can choose to receive information by email, telephone or postal mail about our products and services, or sign-up for subscriptions. When visiting our websites or using our services we may provide you with personalized information. You can always opt-out from receiving personalized communication by sending an e-mail to [unsubscribe@rightcrowd.com](mailto:unsubscribe@rightcrowd.com).

From time to time, we may also collect information that pertains to you indirectly through other sources, such as list vendors. When we do so, we ask the vendors to confirm that the information was legally acquired by the third party and that we have the right to obtain it from them and use it.

The information that we collect, either directly or indirectly, may be combined to help us improve its overall accuracy and completeness, and to help us better tailor our interactions with you.

Where we reference that we use your personal information in connection with a request, order, transaction or agreement (or preparing for the same), or to provide you with services that you requested (such as a website), we do this because it is necessary for the performance of an agreement with you.

Where we reference that we use your personal information in relation to marketing, improvement or development of our products or services, for reasons of safety and security, or regulatory requirements other than in connection with your agreement or request, we do this on the basis of our or a third party's legitimate interests, or with your consent. When we collect and use your personal information subject to the EU Privacy Legislation this may have consequences for Your Rights. RightCrowd is bound by the General Data Protection Regulation ((EU) 2016/679) ("GDPR"), which covers any information relating to an identified or identifiable individual, as well as any secondary legislation from relevant European Union member states.

### **Use of Personal Information**

The following paragraphs describe in more detail how RightCrowd may use your personal information.

#### **Fulfilling your Transaction Request**

If you request something from RightCrowd, for example, a product or service, a callback, or specific marketing materials, we will use the personal information you provide to fulfil your request. To help us do this, we may share information with others, for instance, RightCrowd's business partners, financial institutions, shipping companies, postal or government authorities, such as customs authorities involved in fulfilment. We may also contact you as part of our customer satisfaction surveys or for market research purposes.

#### **Personalizing your Experience on our Websites**

We may use the personal information we collect about you to provide you with a personalized experience on our websites and of our services, such as providing you with content you may be interested in and making navigation on our sites easier. We also may use this information to improve our websites.

#### **Providing Support**

We may use your personal information to support products or services you have obtained from us, such as notifying you of a product update or fix. We may combine your information with information from other interactions with you to provide you with more valuable suggestions in relation to product support.

We may also provide "Live Chat" sessions on our websites to assist you while you're navigating through our sites or forums where problems can be raised and solutions proposed; we will use personal information you provide in these sessions or in such forums in accordance with this Privacy Policy.

In the course of providing technical support to you, we may sometimes have incidental access to data that you have provided to us or data that is located on your system. This data may contain information about you, your organization's employees, customers, partners, or suppliers. This Privacy Policy does not apply to our access to or handling of this personal information; the conditions regarding the handling and processing of this data is covered by the applicable Terms of Use or other agreements between you and RightCrowd.

## **RightCrowd Online services**

We may use information collected on your use of the RightCrowd Online services to allow us to: establish statistics about the usage and effectiveness of our software products and our RightCrowd Online services; improve and personalize your use and experience of our products and services; tailor our interactions with you; inform our clients on overall use of their products and services, and improve and develop our products and services.

## **Marketing**

The personal information you provide to RightCrowd, as well as the personal information we have collected about you indirectly, may be used by RightCrowd for marketing purposes, i.e., to keep you informed about events, products, services and solutions that RightCrowd sells and which may complement an existing product portfolio. Before we do so, however, we will offer you the opportunity to choose whether or not to have your personal information used in this way. You may at any time choose not to receive marketing materials from us by following the unsubscribe instructions included in each e-mail you may receive, by indicating so when we call you, or by contacting us directly (please refer to "How to contact us" below).

Some of our offerings or events may be co-branded or sponsored by RightCrowd and third parties, such as business partners and solution providers, that use, resell or complement RightCrowd products or services. Offerings and events that are co-branded clearly indicate when such partnership exists. If you sign up for these offerings or events, be aware that your information may also be collected by and shared with those third parties. We encourage you to familiarize yourself with those third-party privacy policies to gain an understanding of the manner in which they will handle information about you.

## **Recruitment**

In connection with a job application or inquiry, whether advertised on a RightCrowd website or otherwise, you may provide us with information about yourself, such as a resume. We may use this information throughout RightCrowd in order to address your inquiry or consider you for employment purposes.

## **Monitoring or Recording of Calls, Chats and Other Interactions**

Certain online transactions may involve you calling us or us calling you. They may also involve online chats. Please be aware that RightCrowd may monitor and, in some cases, record such interactions for staff training or quality assurance purposes or to retain evidence of a particular transaction or interaction.

## **Use of Information in the Social Computing Environment**

RightCrowd provides social computing tools on some of its Web sites to enable online sharing and collaboration among members who have registered to use them. These may include forums, wikis, blogs and other social media platforms.

When downloading and using these applications or registering to use these social computing tools, you may be asked to provide certain personal information. Registration information will be subject to and protected in accordance with this Privacy Policy, except for the information that is automatically made available to other participants as part of your profile. These applications and tools may also include supplemental privacy Policies with specific information about collection and handling practices. Read those supplemental policies to understand what the tools and applications may do.

Any other content you post, such as pictures, information, opinions, or any other type of personal information that you make available to other participants on these social platforms or applications, is not subject to this Privacy Policy. Rather, such content is subject to the Terms of Use of those applications or platforms, and any additional guidelines and privacy information provided in relation to their use, as well as the process by which you can remove your content from such tools or get help to do so. Please refer to them to better understand yours, RightCrowd's, and other parties' rights and obligations with regard to such content. You should be aware that the content you post on any such social computing platforms may be made broadly available to others inside and outside RightCrowd.

### **Protect the Rights and Property of RightCrowd and Others**

We may also use or share your personal information to protect the rights or property of RightCrowd, our business partners, suppliers, clients, or others when we have reasonable grounds to believe that such rights or property have been or could be affected. In addition, we reserve the right to disclose your personal information as required by law, and when we believe that disclosure is necessary to protect our rights, or the rights of others, to comply with a judicial proceeding, court order, or legal process served on our websites.

### **Information for Business Partners**

If you represent a RightCrowd business partner, you may visit RightCrowd websites intended specifically for RightCrowd business partners. We may use information provided on that site to administer and develop our business relationship with you, the business partner you represent, and RightCrowd business partners generally. For instance, this may involve using your information to send you details of RightCrowd business partner programs. It may also include sharing certain information with other business partners (subject to any confidentiality obligations that may exist), or RightCrowd clients or prospects. In connection with a particular transaction or program, we may also contact you as part of client satisfaction surveys or for market research purposes.

### **Information for Suppliers**

If you represent a RightCrowd supplier, you may visit RightCrowd websites intended specifically for use by RightCrowd suppliers. We may use the information provided on that site in connection with entering into or performing a transaction with you. For example, this may include sharing information with other parts of RightCrowd, RightCrowd's business partners, clients, shipping companies, financial institutions and postal or government authorities involved in fulfilment. It may also be used to administer and develop our relationship with you, the supplier you represent, and other RightCrowd suppliers generally.

### **Children**

Unless otherwise indicated, our websites, products and services are not intended for use by children under the age of 16.

### **Sharing of Personal Information**

As a global organization offering a wide range of products and services, with business processes, management structures and technical systems that cross borders, RightCrowd has implemented global policies, along with standards and procedures, for consistent protection of personal information. As a global company, we may share information about you with our subsidiaries world-wide and transfer it to

countries in the world where we do business in accordance with this Privacy Policy and the relevant privacy laws.

Between RightCrowd controlled subsidiaries we only grant access to personal information on a need-to-know basis, necessary for the purposes for which such access is granted. In some cases, RightCrowd uses suppliers located in various countries to collect, use, analyze, and otherwise process personal information on its behalf.

Where appropriate, RightCrowd may also share your personal information with selected partners to help us provide you, or the company you work for, products or services, or to fulfil your requests, or with your consent. When selecting our suppliers and partners, we may take into account their data handling processes.

If RightCrowd decides to sell, buy, merge or otherwise reorganize businesses in some countries, such a transaction may involve the disclosure of personal information to prospective or actual purchasers, or the receipt of such information from sellers. RightCrowd makes its best efforts to require appropriate protection for personal information in these types of transactions.

Please be aware that in certain circumstances, personal information may be subject to disclosure to government agencies pursuant to judicial proceeding, court order, or legal process. We may also share your personal information to protect the rights or property of RightCrowd, our business partners, suppliers or clients, and others when we have reasonable grounds to believe that such rights or property have been or could be affected.

### **International Transfers**

The international footprint of RightCrowd involves the transfer of personal information between different subsidiaries, as well as to third parties located in the countries where we do business. Some countries have implemented transfer restrictions for personal information, in connection with which RightCrowd takes various measures, including ensuring compliance on its end with relevant privacy laws.

### **Information Security and Accuracy**

We intend to protect your personal information and to maintain its accuracy. RightCrowd implements reasonable physical, administrative and technical safeguards to help us protect your personal information from unauthorized access, use and disclosure. For example, we encrypt certain sensitive personal information such as credit card information when we transmit such information over the Internet. We also require that our suppliers protect such information from unauthorized access, use and disclosure.

### **Retention**

RightCrowd will retain your personal information for as long as is required to fulfil the purposes for which the information is processed or for other valid reasons to retain your personal information (for example to comply with our legal obligations, resolve disputes, or enforce our agreements).

Your registration information will be retained for as long as your account or RightCrowd ID is active or as needed to provide you services. If you wish to request that we no longer use your registration information to provide you services, contact us at [unsubscribe@rightcrowd.com](mailto:unsubscribe@rightcrowd.com). In relation to RightCrowd Online services which you are authorized to use by the RightCrowd client contracting for that service with RightCrowd, your registration information may be retained to fulfil certain requirements of that RightCrowd client.

We will not retain personal information longer than necessary to fulfil the purposes for which it is processed, including the security of our processing complying with legal and regulatory obligations (e.g. audit, accounting and statutory retention terms), handling disputes, and for the establishment, exercise or defence of legal claims in the countries where we do business.

Because the circumstances may vary depending on the context and the services, the information provided elsewhere in this Privacy Policy or provided in a specific notice may provide more detailed information on applicable retention terms.

### **Cookies, Web Beacon and Other Technologies**

As mentioned above, we collect information from your visits to our websites and your use of our RightCrowd Online services and our software products to help us gather statistics about usage and effectiveness, personalize your experience, tailor our interactions with you, and improve our products and services. We do so through the use of various technologies, including scripts, tags, Local Shared Objects (Flash cookies), Local Storage (HTML5) beacons, and "cookies".

### **What are cookies and why are cookies used**

A cookie is a piece of data that a website can send to your browser, which may then be stored on your computer as a tag that identifies your computer. While cookies are often only used to measure website usage (such as number of visitors and duration of visit) and effectiveness (such as topics visitors are most interested in) and to allow for ease of navigation or use and, as such, are not associated with any personal information, they are also used at times to personalize a known visitor's experience of a website by being associated with profile information or user preferences. Over time this information provides valuable insight to help improve the user experience.

Cookies are typically categorized as "session" cookies or "persistent" cookies. Session cookies help you navigate through the website efficiently, keeping track of your progression from page to page so that you are not asked for information you have already provided during the current visit, or information needed to be able to complete a transaction. Session cookies are stored in temporary memory and erased when the web browser is closed. Persistent cookies on the other hand, store user preferences for current and successive visits. They are written on your device's hard disk, and are still valid when you restart your browser. We may use persistent cookies, for example, to record your choice of language and country location.

### **How to express privacy preferences regarding the use of cookies**

When visiting our websites or online services, you may have the possibility to set your preferences regarding cookies and other similar technologies by using the options and tools made available to you by either your web browser or RightCrowd. If a cookie manager has been implemented by RightCrowd, it will be displayed at your first visit to our website. By clicking 'cookie preferences' at the footer of a RightCrowd website you can choose and change at any time which types of cookies you would like our websites and RightCrowd Online services to use. You can indicate your preference for required, required and functional or required, functional and personalization cookies. Here you can also find more information on the types of cookies used. Using the cookie preferences does not result in deletion of cookies that are already on your device. You can delete cookies already on your device via the settings of your web browser.

While RightCrowd websites and online services at this time do not recognize automated browser signals regarding tracking mechanisms, such as "do not track" instructions, you can generally express your privacy preferences regarding the use of most cookies and similar technologies through your web browser. Look

under the heading "Tools" (or similar heading) in your particular browser for information about controlling cookies. In most instances you can set your browser to notify you before you receive a cookie, giving you the option to decide whether to accept it or not. You can also generally set your browser to turn off cookies. Cookies in our software products can be turned off in the product itself. Since cookies allow you to take advantage of some of our websites' features or features of our software products and RightCrowd Online services, we recommend that you leave them turned on. If you block, turn off or otherwise reject our cookies, some web pages may not display properly or you will not be able to, for instance, add items to your shopping cart, proceed to checkout, or use any website or RightCrowd Online services that require you to sign in.

### **Web beacons or other technologies**

Some RightCrowd websites, RightCrowd Online services, and software products may also use web beacons or other technologies to better tailor those sites to provide better customer service. These technologies may be in use on a number of pages across RightCrowd's websites. When a visitor accesses these pages, a non-identifiable notice of that visit is generated which may be processed by us or by our suppliers. These web beacons usually work in conjunction with cookies. If you don't want your cookie information to be associated with your visits to these pages or use of these products, you can set your browser to turn off cookies or turn off cookies in the product itself, respectively. If you turn off cookies, web beacon and other technologies will still detect visits to these pages; however, they will not be associated with information otherwise stored in cookies.

For more information about the technologies employed by our RightCrowd Online services and software products, including how to turn them off, please consult the user guide for the particular software product or RightCrowd Online service you are using.

We may use Local Shared Objects, such as Flash cookies, and Local Storage, such as HTML5, to store content information and preferences. Third parties with whom we partner to provide certain features on our website or to display RightCrowd advertising on others' websites based upon your web browsing activity may also use Flash cookies or HTML5 to collect and store information. Various browsers may offer their own management tools for removing HTML5. To manage Flash cookies, please visit:

[http://www.macromedia.com/support/documentation/en/flashplayer/help/settings\\_manager07.html](http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html)

We may also include web beacons in marketing e-mail messages or our newsletters in order to determine whether messages have been opened and links contained within clicked on.

Some of our business partners may set web beacons and cookies on our site. In addition, third-party social media buttons may log certain information such as your IP address, browser type and language, access time, and referring website addresses, and, if you are logged in to those social media sites, they may also link such collected information with your profile information on that site. We do not control these third party tracking technologies.

### **Online Advertising**

RightCrowd does not deliver third party online advertisements on our web sites but we may advertise our products and services on others' websites. Please familiarize yourself with those website operators' or network advertisers' privacy policies to understand their practices relating to advertising, including what type of information they may collect about your Internet usage.

Some advertising networks we may use may be members of the Network Advertising Initiative (NAI) or the European Interactive Digital Advertising Alliance (EDAA).

Individuals may opt-out of targeted advertising delivered by NAI or EDAA member ad networks by using tools provided visiting the following sites:

Digital Advertising Alliance (DAA): <http://www.aboutads.info/choices>

NAI: <http://www.networkadvertising.org> or

EDAA: <http://www.youronlinechoices.eu/>

We may have also engaged with certain third parties to manage some of our advertising on other sites. These third parties may use cookies and web beacons to collect information (such as your IP address) about your activities on RightCrowd's and others' websites to provide you targeted RightCrowd advertisements based upon your interests.

### **Links to Non- RightCrowd Websites and Third-Party Applications**

To allow you to interact with other websites on which you may have accounts (such as Facebook and other social media sites) or join communities on such sites, we may provide links or embed third-party applications that allow you to login, post content or join communities from our websites.

We may also provide you with general links to non- RightCrowd websites.

Your use of these links and applications is subject to the third parties' privacy policies, and you should become familiar with the third-party sites' privacy policies before using the links or applications. RightCrowd is not responsible for the privacy practices or the content of those other websites.

### **Notification of Changes**

If we make any material changes to this Privacy Policy, we will notify you via notification on our website, and as otherwise required by applicable law.

### **Your Rights**

You can request to access, update or correct your personal information. You also have the right to object to direct marketing. You can access the request process by writing to: [compliance@rightcrowd.com](mailto:compliance@rightcrowd.com).

You may have additional rights pursuant to your local law applicable to the processing. For example, if the processing of your personal information is subject to the EU General Data Protection Regulation ("GDPR"), and your personal information is processed based on legitimate interests, you have the right to object to the processing on grounds relating to your specific situation. Under GDPR you may also have the right to request to have your personal information deleted or restricted and ask for portability of your personal information.

### **Right to Lodge a Complaint**

In the event you consider our processing of your personal information not to be compliant with the applicable data protection laws, you can lodge a complaint:

Directly with RightCrowd by contacting: [compliance@rightcrowd.com](mailto:compliance@rightcrowd.com).

With the competent data protection authority. The name and contact details of the Data Protection Authorities in the European Union can be found at [http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm).

### **Changes to our Privacy Statements**

From time to time we may update this Privacy Policy, as well as any other specific privacy policy. When making changes to this Privacy Policy, we will add a new date at the top of this Privacy Policy.

## How to contact us

For the purposes of the EU General Data Protection Regulation (GDPR), the controller of your personal information is RightCrowd Software Pty Ltd (RightCrowd), Suite 501, Level 5, The Rocket, 203 Robina Town Centre Drive, Robina, Queensland, 4227, Australia, unless indicated otherwise.

If you have a question related to this Privacy Policy, please contact us at the:

RightCrowd Corporate Privacy

Office Suite 501, Level 5, The

Rocket, 203 Robina Town

Centre Drive, Robina,

Queensland, 4227, Australia

Email: [compliance@rightcrowd.com](mailto:compliance@rightcrowd.com)

If you do not want to receive future marketing communications from RightCrowd, including subscriptions, please send an email to [unsubscribe@rightcrowd.com](mailto:unsubscribe@rightcrowd.com).

In certain cases, you may have the ability to view or edit your personal information online. In the event your information is not accessible online, and you wish to obtain a copy of particular information you provided to RightCrowd, or if you become aware the information is incorrect and you would like us to correct it, contact us at: [compliance@rightcrowd.com](mailto:compliance@rightcrowd.com). More information on Your Rights can be found here.

If you no longer wish to receive marketing e-mails from RightCrowd, please send an e-mail to [unsubscribe@rightcrowd.com](mailto:unsubscribe@rightcrowd.com) or follow the unsubscribe instructions included in each marketing email.