

Privacy Policy

iintro Pty Ltd ACN 679 508 331 trading as Soci@locals (**we, us or our**) is committed to protecting the privacy of your personal information.

Personal information is information that identifies you or information by which your identity can reasonably be ascertained and may include an opinion about you (**Personal Information**).

We collect, use, store, manage and disclose all Personal Information in accordance with this Privacy Policy and otherwise in accordance with the Australian Privacy Principles set out in the *Privacy Act 1988* (Cth) (**Privacy Act**).

This Privacy Policy contains the following sections:

1. *About this Privacy Policy*
2. *What kind of Personal Information do we collect and hold?*
 - 2.1. *General*
 - 2.2. *Sensitive Information*
3. *How do we collect Personal Information?*
 - 3.1. *Personal Information*
 - 3.2. *Billing Information – Third Party Payment Processors*
 - 3.3. *Billing Information – App Stores*
 - 3.4. *Choosing not to Disclose Personal Information*
 - 3.5. *When you Browse our Website*
 - 3.6. *Cookies*
 - 3.7. *Other Social Platforms*
 - 3.8. *Children*
4. *How we use your Personal Information*
 - 4.1. *General*
 - 4.2. *Marketing and Consent*
 - 4.3. *Polls and Surveys*
 - 4.4. *Rate and Review*
 - 4.5. *Artificial Intelligence*
5. *How your Personal Information may be Disclosed*
 - 5.1. *Other Users*
 - 5.2. *Business Associates and Contractors*
 - 5.3. *Statistical Data*
 - 5.4. *Permitted Disclosures by Law*
 - 5.5. *International Disclosures*
 - 5.6. *Links to Other Sites or Social Platforms*
6. *Security*
7. *How to access and amend Personal Information you provide*
8. *Contact Us*

1. About this Privacy Policy

This Privacy Policy explains how we collect, use, manage and disclose Personal Information and how you can contact us if you have queries about our management of your Personal Information.

This Privacy Policy applies to all Personal Information submitted to or collected by us when you use the "Soci@locals Service" as that term is defined the Soci@locals Service Terms of Use <https://socialocals.com.au/terms-of-use> or where you otherwise contact or interact with us through other forms of communication.

By submitting personal information to us (including via our website or social media sites or using the Soci@locals app), you accept the terms of this Privacy Policy, and consent to our use, collection, disclosure and retention of Personal Information as described in this Privacy Policy. This Privacy Policy does not apply to information that you may provide to third parties, such as other users of the Soci@locals Service when not using our services, and others with whom you may share information about yourself.

If you do not agree to any provisions in this Privacy Policy, you should not disclose any Personal Information to us.

You are welcome to access, print or download this Privacy Policy at any time at <https://sociallocals.com.au/privacy-policy>

Please note that this Privacy Policy may be updated or revised from time to time without notice and changes will apply immediately. Changes to this Privacy Policy will be published by posting an updated Privacy Policy on our website and in our app. Therefore, you should review our Privacy Policy regularly to ensure you are familiar with any changes.

If you do not agree with the changes to our Privacy Policy, please notify us immediately in writing. Unless we hear from you, or if you continue to use our services, website or social media sites, you are taken to have accepted the changes to our Privacy Policy.

This Privacy Policy was last updated on 9 January 2025.

2. What kind of Personal Information do we collect and hold?

2.1. General

As part of offering the Soci@locals Service to you, it is likely that we will collect Personal Information about you. In addition, you may need to create a user account as a registered user to use some of our services. The Personal Information we collect may include:

- your first and last names;
- your phone number (including mobile numbers);
- your mailing address, business address and email address;
- user name and password of your account;
- any further information, instructions or comments given by you;
- details of the services you have purchased, considered or enquired about, together with any additional information necessary to deliver those services and respond to your queries;
- payment information such as name, account number and payment card details for payments processed by us or a third party payment gateway;
- any additional information relating to you that you provide to us directly or indirectly through our representatives or our website or social media sites, including via customer surveys or user feedback;
- any photos that are captured as a result of using our services; and
- any other Personal Information you provide to us from time to time.

2.2. Sensitive Information

We may collect "Sensitive Information" as defined by the Privacy Act (such as information about ethnic origin, religious or political views, health information, sexual identify etc) from you. Sometimes your

interaction with the Soci@locals Service, including searching for, expressing interest or confirming your attendance to an event listed on the Soci@locals Service may indicate information about your ethnic origin, religious or political views, health information, sexual identity.

If you voluntarily submit Sensitive Information to us for any purpose, you consent to our collection of such Sensitive Information and we will only use or disclose such information:

- for the purpose for which it was provided or another directly related purpose; or
- as allowed by law.

3. How do we collect Personal Information?

3.1. Personal Information

We may collect Personal Information via a variety of avenues, including when you:

- create a user account with us;
- telephone, email or engage in online communication with one of our representatives;
- access or use the Soci@locals Service;
- participate in surveys; or
- subscribe to our mailing lists.

We may also utilise the services of third parties (e.g. the organisation through which you engage us) for the collection of your Personal Information.

3.2. Billing Information – Third Party Payment Processors

We may use third party payment processors to collect payments made by you on the Soci@locals Service. In these situations, we do not have access to the credit card or billing information provided by you to our third party payment processor. If you are directed to our third party payment processor's site, you may be subject to terms and conditions governing use of that third party's service and that third party's collection and disclosure practices in relation to personal information. Please review such terms and conditions and the third party's privacy policy before using their services.

3.3. Billing Information – App Stores

Where you access the Soci@locals Service via an app you may complete payment as an in-app purchase via an app store, such as the Apple App Store or Google Play Store. In these situations, we do not have access to the credit card or billing information provided by you to the app store. You may be subject to separate terms and conditions governing the app store and the app store's collection and disclosure practices in relation to Personal Information. Please review such terms and conditions and the app store's privacy policy before using their services.

3.4. Choosing not to Disclose Personal Information

You have the option of not disclosing Personal Information to us or to use a pseudonym when dealing with us in relation to a particular matter. If you choose to withhold any Personal Information, we may not be able to provide you with part or all of our services or resolve a particular matter raised by you.

3.5. When you Browse our Website

We or our internet service provider may make a record of your visit to our website and record your email address (if provided) and other information such as your server address; your internet protocol address; the pages you accessed and documents downloaded; the previous site you visited; and the type of

browser being used. The information assists us to analyse web traffic and improve your site navigation experience.

We do not identify you or your browsing activities except, in the event of an investigation, where a law enforcement agency may exercise a warrant or other such power to inspect the internet service provider's logs.

3.6. Cookies

We may also obtain anonymous information from our website or social media sites using a technology called "cookies". Cookies are small text files which are transferred to the hard drive of your computer and device to provide additional functionality to our website and to help us analyse usage of our website or social media sites. Cookies can identify your web browser but not you. If you wish, you can disable your web browser from accepting cookies. If you disable cookies, you will still be able to access our website and social media sites but may not be able to access all of our services.

3.7. Other Social Platforms

There may also be occasions when we collect Personal Information (to the extent it is available) from publicly available sources, including other social media platforms.

If you engage or contact us on one of our social media platforms or otherwise direct us to communicate or engage with you via social media, you agree to allow us to receive information (which may include Personal Information) from our social media platforms. You also allow us to receive information about your visits and interaction with the sites and services of any of our third party partners that include our cookies and similar technologies unless you opt out.

3.8. Children

We are committed to protecting the privacy needs of children and we do not seek to collect Personal Information from a person under the age of 18.

4. How we use your Personal Information

4.1. General

We may use the Personal Information you provide to us for the purposes for which it was initially collected or purposes related to such initial purpose (if such purpose would be within your reasonable expectations). For example, to:

- provide you with the Soci@locals Service you have requested from us in accordance with our Terms of Use <https://sociallocals.com.au/terms-of-use>
- respond to your queries and requests, to resolve complaints and to respond to social media;
- keep a record of our dealings with you and enable us to contact you when necessary;
- help us tailor existing, or develop new, products, services or offers;
- send you information about areas of specific interest if you have subscribed to our mailing lists, or provided your contact details;
- assess a job application;
- in the case of contractors, to pay fees and any contractor entitlements, and otherwise manage your relationship with us; and
- achieve other purposes explained at the time of collection or submission.

We may also use your Personal Information for purposes authorised by laws or regulations, such as to prevent or investigate alleged crime or fraud.

4.2. Marketing and Consent

By supplying us with your Personal Information, you give us permission to use your Personal Information to contact you to inform you about products and services we think would be of particular interest to you, including from other businesses operated by or related to us. This may include contacting you through direct marketing, events and competitions, public relations and social media. This permission is not limited in time unless you choose to opt out by contacting us using the contact information provided in this Privacy Policy, or by utilising an 'unsubscribe' facility on a communication we send to you in which case we will take steps to ensure you do not receive any such direct marketing information in future.

4.3. Polls and Surveys

We or third parties may contact you in relation to your participation in polls and surveys, deliver incentives to you to participate in such surveys or polls, or target advertisements to you based on your answers to the poll. We may share the aggregated demographic information in these polls and surveys with our sponsors, advertisers and partners. If, however, we conduct a poll or survey and wish to disclose your Personal Information to any third party, we will first explicitly seek your consent to do so. If a third party conducts a poll or survey and receives your Personal Information, then your Personal Information will be used and disclosed in accordance with the privacy policy of that third party.

4.4. Rate and Review

If you submit a review, rating, photograph or comments in relation to products or our services, you agree that we may publish part or all of your review, rating, photograph or comments together with your first name.

4.5. Artificial Intelligence

We may use your Personal Information with artificial intelligence or artificial intelligence powered tools to provide and improve the Soci@locals Service, including to enhance user experience and personalise services. For example, we may use artificial intelligence or artificial intelligence powered tools as follows:

- to suggest templates for creating profiles, event descriptions, and messaging with other users based on your interactions and preferences;
- to learn about your interests and browsing patterns to recommend events that align with your preferences;
- to analyse ratings you provide to further refine your event feed, ensuring relevant suggestions;
- to analyse app usage to deliver relevant in-app advertisements and marketing based on your interests;
- when creating an event, to suggest images based on your event title to streamline setup and provide quick access to suitable images; and
- use your current location to recommend events nearby, helping you discover relevant events in your area.

5. How your Personal Information may be Disclosed

We do not sell, rent, lease or provide your Personal Information to other entities unless outlined in this Privacy Policy. We may disclose your Personal Information where you have consented or when

disclosure is necessary to achieve the purpose for which it was submitted (as outlined above). In addition, we may receive and disclose Personal Information from or to our related entities.

5.1. Other Users

Some of your Personal Information will be visible to other users of the Soci@locals Service. This will be where you share Personal Information on the Soci@locals Service for others to see (e.g. your public profile).

5.2. Business Associates and Contractors

We may disclose your Personal Information to organisations that carry out functions on our behalf, or assist us to deliver our services, such as our business associates, contractors, agents or service providers. These third parties may change from time to time. Some examples include:

- carefully selected suppliers and other third parties with whom we have commercial relationships, for business, marketing and related purposes;
- financial services providers, such as our banks or third party supplier for securing payment of the products or services we provided to you, and, where applicable, debt collectors;
- technology service providers, such as internet service providers, database management services, data storage providers, website hosting companies, website developers and digital mail providers who send communications on our behalf;
- sponsors or organisations that partner with us; and
- our professional advisers, accountants, lawyers and auditors.

You agree that third parties which receive Personal Information from us may use and disclose the Personal Information subject to their respective privacy policies. We endeavour to take reasonable steps to enter into agreements with third parties that collect, store, disclose and retain Personal Information in accordance with the Australian Privacy Principles, except as otherwise required by law.

5.3. Statistical Data

From time to time, we may provide third parties with information in the form of statistical representations about our users collectively and for the purpose of statistical analysis. Where we provide such information to third parties for this limited statistical purpose, we will not provide Personal Information in such a way that your identity may be obtained.

5.4. Permitted Disclosures by Law

We may also release your Personal Information under the following circumstances:

- when required to do so by a court or under applicable laws or regulation (for example, a subpoena) or where requested by a government agency;
- where we consider a company or an individual may be engaged in fraudulent activity or other deceptive practices that a governmental agency should be made aware of; or
- to appropriate persons, where your communication suggests possible harm to others.

5.5. International Disclosures

Personal Information may be stored, disclosed, processed in or transferred outside of Australia from time to time, for example where we use cloud storage providers that have servers located outside Australia for storage of your Personal Information. The countries in which the Personal Information is received may not have data protection laws equivalent to those in force in Australia.

You acknowledge and agree to such international data and information transfers with respect to Personal Information. Clause 8.1 of the Australian Privacy Principles contained in Schedule 1 of the Privacy Act provides that if we disclose Personal Information about an individual to an overseas recipient, then we must take such steps as are reasonable in the circumstances to ensure the overseas recipient does not breach the Australian Privacy Principles in relation to such information. An exception to this is if we obtain your consent. Unless you notify us in writing to the contrary, you will be taken to have consented to the disclosure by us of Personal Information to overseas recipients on the basis that:

- clause 8.1 of the Australian Privacy Principles will not apply to such disclosure;
- if the overseas recipient engages in any act that contravenes the Australian Privacy Principles, you will not be able to seek redress under the Privacy Act;
- the overseas recipient may not be subject to any privacy obligations or to any principles similar to the Australian Privacy Principles;
- you may not be able to seek redress in the overseas jurisdiction; and
- the overseas recipient is subject to a foreign law that could compel the disclosure of personal information to a third party, such as an overseas authority.

5.6. Links to Other Sites or Social Platforms

We may provide links to third party websites within our website and social media sites. These linked sites are not under our control, and we do not accept responsibility for the conduct of companies the websites of which are linked to the website. Before disclosing your Personal Information to any third parties on such websites, we advise you to examine the terms and conditions of using that website and its privacy statement.

6. Security

We consider confidentiality of Personal Information collected from you to be of utmost importance.

To prevent unauthorised access to, disclosure, misuse or loss of, or interference with, your Personal Information, we take reasonable steps to safeguard the security and confidentiality of your information. Unfortunately, since no system is 100% secure or error-free, we cannot guarantee that your Personal Information is totally protected, for example, from hackers or misuse. Except to the extent that liability cannot be excluded or limited due to applicable law, we assume no liability or responsibility for disclosure of your Personal Information due to unauthorised third party access, errors in transmission or other causes beyond our control.

If you enter or upload Personal Information when using the Soci@locals Service, you should exercise due care to safeguard any passwords and usernames created by you.

We will take reasonable steps to destroy or permanently de-identify any Personal Information from our records and systems which is no longer required by us. We may retain your Personal Information even after you have completed your transactions with us if retention is reasonably necessary to comply with our legal obligations, meet regulatory requirements, resolve disputes, prevent fraud or abuse or enforce this Privacy Policy and our terms and conditions. We may retain Personal Information for a limited period of time, if requested by law enforcement.

7. How to access and amend Personal Information you provide

We strive to keep your Personal Information accurate, up to date and complete. Our policy enables you to find out what information we hold about you and correct that information if it is wrong.

If you become aware that any Personal Information we hold about you is incorrect or out of date, you may correct the Personal Information by logging into your customer account. Otherwise, please let us know immediately. We will be happy to accept updated Personal Information in writing from the owner of that information at any time. However, in order to protect your privacy and security, we will take reasonable steps to verify your identity before granting you access or enabling you to make corrections of your Personal Information. Except where the Privacy Act provides otherwise, we reserve the right to recover any reasonable costs involved in providing extensive access to Personal Information, for example the cost of supplying information held in archives.

Our objective is to respond to any request to access personal information within a reasonable timeframe and no later than thirty (30) days. We will endeavour to inform you if this timeframe is not achievable.

In some circumstances, we may not be in a position to grant access to your Personal Information, such circumstances include where:

- providing access is likely to pose a serious threat to the safety of an individual or the public;
- providing access is likely to unreasonably impact on the privacy of others;
- the request for access is frivolous or vexatious;
- providing access would reveal information which relates to existing or anticipated legal proceedings or otherwise impact on any negotiations;
- providing access is unlawful (including being unlawful as directed by a court or tribunal order) or is likely to impact on actions being taken in relation to alleged unlawful activities relating to our functions and activities; or
- granting access would impact on a commercially sensitive decision-making process.

8. Contact Us

If you have any questions about our Privacy Policy, or have a problem or complaint, please let us know. We will respond to a complaint as soon as possible, but within ten (10) working days, to let you know who is responsible for managing your complaint. We will also try to resolve the complaint within 30 days. When this is not possible, we will endeavour to contact you within that time to let you know how long it will take to resolve the complaint.

Our contact details are:

Privacy Officer

Soci@locals

Postal Address: PO Box K208, Haymarket NSW 1240

Phone: +61 494 395 730

E-mail: hello@sociallocals.com.au

If you believe we have not adequately dealt with your complaint, you may complain to the Privacy Commissioner, whose contact details are found on their website <http://www.oaic.gov.au/>.