

Legal and Regulatory

1. INTRODUCTION

SAVVY Corporation T/A THINK SAVVY and its offices, branches and associated firms ("SCorp", "we", "our" or "us") is an international consulting practice. See www.think-savvy.com/legal-and-regulatory for further details about our structure and firms.

We are committed to ensuring that when we collect and use information provided to us or information about visitors to our websites (as described below) we do so in accordance with applicable data privacy laws. This Privacy Policy explains how we may use information that we obtain about you. For further information, please contact privacy@think-savvy.com.

2. SCOPE OF PRIVACY POLICY

This Privacy Policy applies to your use of any of our services, including when you request information from us or engage our consulting and other services, or as a result of your relationship with one or more of our clients, or to any information collected from third parties.

This Privacy Policy also applies to all our websites and online services, including the following:

- think-savvy.com (including content under sub-domains of think-savvy.com);
- our and/or our channel partners mobile apps; and
- any other website, mobile app or other online service created or hosted by us from time to time on which this privacy policy appears,

together, our "online services".

We may need to collect certain details from you through our online services if, for example, you want to subscribe to our publications, register to use an app or apply for a job. In addition, our online services make use of cookies and similar technologies, as described in more detail in our [Cookie Policy](#) [Capstone team are we going to use cookies and do I need a policy? Please let me know](#)

Our client confidentiality obligations are not addressed by this Privacy Policy but are instead described in our terms of engagement.

3. INFORMATION COLLECTION

General

We will collect personal information directly from you, from clients or from authorised representatives. We may also collect personal information from third parties such as regulatory authorities, your employer, other organisations with whom you have dealings, government agencies, credit reporting agencies, recruitment agencies, information or service providers, publicly available records and the third parties described in the 'Disclosure of your information' section below. We will handle any unsolicited information in accordance with law, including destroying or de-identifying such information where we are required to do so by a relevant law.

We may collect current and historical personal information including your name, contact details, identification, organisation, employment, positions held and enquiry/complaint details. We may also collect personal information about your other dealings with us and our clients, including any contact we have with you by telephone, email or online.

Online Services

When you use our online services, we may collect the following:

- Information you provide by completing forms (this includes information you give us when registering for any of our online services, subscribing to our services, submitting material or requesting further services);
- Information you provide to us if you contact us, for example to report a problem with our online services or raise a query or comment; and
- Details of visits made to our online services including, but not limited to, the volume of traffic received, logs (including, where available, the IP address and location of the device connecting to the online services and other technical information and identifiers about the device and the nature of the visit) and the resources accessed.

Careers and Recruitment: If you apply online for a job or work placement you may need to provide information about your education, employment, racial background and state of health. Your application will constitute your express consent to our use of this information to assess your application and to allow us to carry out any monitoring activities which may be required of us under applicable law as an employer. We may also carry out screening checks (including reference, background, directorship, financial probity, identity, eligibility to work, vocational suitability and criminal record checks) and consider you for other positions. We may exchange your personal information with academic institutions, recruiters, screening check providers, health service providers, professional and trade associations, law enforcement agencies, referees and your current and previous employers. Without your personal information, we may not be able to progress considering you for positions with us.

4. USE OF YOUR INFORMATION

We use your information in order to provide you with, and improve, our services, for example:

- To ensure that content from our online services is presented in the most effective and secure manner for you and for your device and settings;
- To provide you on an ongoing basis with information and services, including consulting advice, that you request from us or which we feel may interest you as permitted under applicable law, and to measure the popularity and effectiveness of services such as newsletters and seminar invitations, in order to improve what we offer to you and other recipients;
- To maintain and develop our relationship with you;
- For research, planning, service development, security or risk management;
- To maintain and update our records;
- To carry out our obligations arising from any contracts entered into between you and us;
- To facilitate our internal business operations, including to fulfil our legal requirements and professional obligations; and
- To allow you to use or access interactive features or secure areas of our websites, when you choose to do so.

We may not be able to do these things without your personal information. For example, we may not be able to provide our services to you.

Under applicable data protection legislation we have a duty of care to ensure that your personal information is accurate and up to date. Therefore, please advise us of any changes to your information at privacy@thnik-savvy.com.

5. DISCLOSURE OF YOUR INFORMATION

We own the database rights in the information collected via our online services. We do not trade in or rent out this information.

As an international consulting practice, we may in providing our services and operating our business, allow our offices, branches, subsidiaries and associated firms and our service providers to access your information.

In addition, we may exchange your personal information with third parties where:

- You have consented to us sharing your personal information in this way;
- We are under a legal, regulatory or professional obligation to do so (for example, in order to comply with anti-money laundering requirements) or in order to enforce or apply our Terms of Business (or other client terms) or to protect the rights and interests, property, or safety of Savvy Corporation, our clients or others;
- All, or substantially all the assets of an entity within SCorp are merged with or acquired by a third party, or we expand or re-organise our business, in which case your personal information may form part of the transferred or merged assets or we may need to transfer your information to new entities or third parties through which our business will be carried out;
- It is relevant in the circumstances to disclose the information to our clients, your employer or place of business, your professional advisers and parties with whom we have co-promotional arrangements (such as jointly sponsored events);
- We provide anonymous statistical information about users of our websites and related usage information to reputable third parties, including analytics and search engine providers; or
- We use a third-party service provider to provide services that involve data processing, for example archival, auditing, reference checking, professional advisory (including legal, accounting, financial and business consulting), mailing house, delivery, technology, website, research, banking, payment, client contact, data processing, insurance, forensic, litigation support, marketing and security services.

Some of the third parties with whom we share personal information may be located outside your country or the country from which the data were provided (collectively the "jurisdiction of origin"), including in the countries where SCorp conducts business or the countries where a firm that we have an association or alliance with has an office. While such third parties will often be subject to privacy and confidentiality obligations, you accept that where lawful such obligations may differ from and be less stringent than the requirements of the privacy laws of the jurisdiction of origin. In those cases, we are not responsible for imposing the laws of the jurisdiction of origin, and you may not be able to seek redress under those laws.

6. SECURITY

The transmission of information via the internet is not completely secure. We cannot guarantee the security of your data transmitted to our online services; any transmission is at your own risk. Once we have received your information, we will take reasonable steps to use procedures and security features to try to prevent unauthorised access, modification or disclosure. For example, electronic communications through non-secure web platforms including WeChat or Skype may not be secure, virus-free or

successfully delivered. If you communicate with us using a non-secure web platforms, you assume the risks that such communications between us are intercepted, not received, delayed, corrupted or are received by persons other than the intended recipient.

We take reasonable steps to hold information securely in electronic or physical form. We store information in access controlled premises or in electronic databases requiring logins and passwords. We require our third-party data storage providers to comply with appropriate information security industry standards. All Directors and staff and third party providers, with access to confidential information are subject to confidentiality obligations.

The data that we collect from you may be transferred to, and stored at, a destination outside the Australian Economic Area. It may also be processed by staff operating outside the Australian Economic Area who work for us or for one of our suppliers.

You can help us to keep your information secure; please remember that any user name or password in relation to our website/s is personal to you and should not be made available to any other person. You should stop using your username and password and notify us immediately if you suspect that someone else may be using them.

7. COOKIES

Our online services use cookies and other similar technologies, for example, to distinguish you from other users when you browse our websites or use our online services and also to allow us to improve our online services. For more information about the cookies we use, the purposes for which we use them and details on how to block or delete cookies, please see our [Cookie Policy](#)... Capstone team are we going to use cookies and do I need a policy? Please let me know)

8. THIRD-PARTY SITES

In addition to our online services, which we control directly, we also use and provide links to websites which are controlled by third parties, which may include:

LinkedIn where we have a company page; Facebook, where we have other social pages; Sprout Video, which powers the video streaming across some of our online services; and Twitter, Instagram and YouTube, where we have certain SAVVY Corporation T/A THINK SAVVY accounts and profiles.

If you use or follow a link to any of these third-party websites, please be aware that these websites have their own privacy policies and that we cannot accept any responsibility for their use of information about you.

9. YOUR RIGHTS

The privacy laws of some jurisdictions also give individuals the right to access and amend their personal information. If you would like to request a copy of your data or would like to change the information we hold about you, please contact us as set out below. We may refuse to provide access and may charge a fee for access if the relevant legislation allows us to do so, in which case we will provide reasons for our decision as required by law.

At any time if you would prefer to stop receiving newsletters and updates from us, please use the “unsubscribe” option included in the email or other material.

10. STATUS OF THIS POLICY

Your use of our online services or your provision of personal information to us constitutes your acceptance of the terms of this Privacy Policy.

Technologies and information governance practices are constantly developing. We may therefore need to revise this Privacy Policy in future. You should therefore review this page regularly to ensure that you are aware of any changes to its terms.

11. CONTACT AND FURTHER INFORMATION

To find out more about SCorp entities, please visit www.think-savvy.com/contact-us

If you have any questions about this Privacy Policy, or want to submit a written complaint about how we handle your personal information, please contact our Privacy Officer via privacy@think-savvy.com or call your local THINK SAVVY office.

If you make a privacy complaint, we will respond to let you know how your complaint will be handled. We may ask you for further details, consult with other parties and keep records regarding your complaint.

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