

T R I B A L

Tribal Privacy Policy

Tribal, Tribal Campus, Callista & SchoolEdge

Last update - 02 February 2021

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Tribal Group Pty Limited. ACN 135 097 942

Tribal Campus Pty Limited. ACN 149 756 203

Human Edge Software Corporation Pty Limited. ACN 006 130 829 Callista

Software Services Pty Limited. ACN 078 516 248



1 Privacy Policy

Tribal Group Pty Limited (**Tribal**), Tribal Campus Pty Limited (**Tribal Campus**), Human Edge Software Corporation Pty Limited (**SchoolEdge**), Callista Software Services Pty Limited (**Callista**) and their related bodies corporate (**we, our, us** (respectively)) recognise the importance of protecting the privacy under the *Privacy Act 1988* (Cth) (**Act**) and the rights of individuals in relation to their personal information. This document is our privacy policy and it tells you how we collect, hold, use and disclose your personal information.

1.1 What personal information do we collect and hold?

We may collect the following types of personal information:

- name;
- mailing or street address;
- email address;
- telephone number;
- facsimile number;
- age or birth date;
- profession, occupation or job title;
- details of the products and services you have purchased from us or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries;
- any additional information relating to you that you provide to us directly through our websites or indirectly through use of our websites or online presence, through our representatives or otherwise; and
- information you provide to us through our service centre, our customer support portals, customer surveys or visits by our representatives from time to time.

1.1.1 i-Graduate – Personal Information Collected and Held

i-graduate collects information primarily through the use of voluntary online surveys to students of the education institutions with which it works. i-graduate survey participation is anonymous and therefore typically the information collected does not fall within the Act. However, i-graduate may collect personal information in the following circumstances:-

- Completion of a survey may entitle an individual to participate in a prize-draw, and to do so the participant provides their name and contact details (so that the prize can be awarded to them should they win);
- It is possible that participants in a survey can provide responses to a number of individual survey questions which in isolation would not allow a person to be identified, but the combination of responses may allow the person to be identified (e.g. a combination of responses may narrow down the range of possible individuals that could have answered the questions in such a way as to allow the person to be identified); and
- “Free-text” responses to questions could allow a participant to provide information which allows them to be identified. i-graduate uses all reasonable endeavours to advise respondents not to identify themselves or others when providing free-text responses. i-graduate also collects information about survey participants, such as their ethnicity, for the purposes of statistical profiling. If this information is linked to an individual (through the mechanisms described immediately above) then this is considered “sensitive information” under the Act.

1.1.2 Benchmarking Division – Personal Information Collected and Held

Tribal's benchmarking division undertakes rigorous financial benchmarking analysis, primarily in the education sector. As part of this, we receive financial information, including personal information, from our clients. We process that information and provide summary information, or in some cases disaggregated detailed information, back to those same clients.

1.2 How do we collect and hold your personal information?

We collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect in ways including:

- through your access and use of our websites (including in the case of i-graduate through the use of our partners' websites);
- during conversations between you and our representatives;
- when you complete a survey; or
- when you complete an application or purchase order.
- We may also collect personal information from third parties, including from third party companies such as customers, credit reporting agencies, law enforcement agencies and other government entities.

Personal information which we collect is stored by us and by third party service providers which provide data storage and hosting services to us. Where appropriate, we may combine or share any information that we collect from or about you with information collected by any of our related bodies corporate (both inside and outside Australia). For more information on how we secure your personal information, please see section 1.10 (Security) below.

What happens if we can't collect your personal information?

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

- we may not be able to provide the requested products or services to you, either to the same standard or at all;
- we may not be able to provide you with information about products and services that you may want, including information about discounts, sales or special promotions; or
- we may be unable to tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful.

1.3 Cookies

In some cases, we may also collect your personal information through the use of cookies. When you access our website, we may send a "cookie" (which is a small summary file containing a unique ID number) to your computer. This enables us to recognise your computer and greet you each time you visit our website without bothering you with a request to register. It also enables us to keep track of products or services you view so that, if you consent, we can send you news about those products or services. We also use cookies to measure traffic patterns, to determine which areas of our website have been visited and to measure transaction patterns in the aggregate. We use this to research our users' habits so that we can improve our online products and services. Our cookies do not collect personal information. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.

We may log IP addresses (that is, the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track user's movements, and gather broad demographic information.

For more information on our use of cookies, see our [cookie policy](#).

1.4 For what purposes do we collect, hold, use and disclose your personal information?

We collect personal information about you so that we can perform our business activities and functions and to provide best possible quality of customer service.

We collect, hold, use and disclose your personal information for the following purposes:

- to provide products and services to you and to send communications requested by you;
- to answer enquiries and provide information or advice about existing and new products or services;
- to provide you with access to protected areas of our website;
- to assess the performance of the website and to improve the operation of the website;
- in the case of i-graduate, to facilitate the awarding of prizes to survey participants;
- in the case of our Benchmarking division, to facilitate processing, analysis and reporting of financial benchmarking data to clients;
- to conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- for the administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes of Tribal, Tribal Campus, SchoolEdge, Callista, their related bodies corporate, contractors or service providers;
- to provide your updated personal information to our related bodies corporate, contractors or service providers (see section 1.5 below);
- to update our records and keep your contact details up to date;
- to process and respond to any complaint made by you; and
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country (or political sub-division of a country).

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

1.5 To whom may we disclose your information?

We may disclose your personal information to:

- our employees, related bodies corporate, contractors and service providers for the purposes of operation of our website or our business, fulfilling requests by you, and to otherwise provide products and services to you including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants;
- suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes; and
- any organisation for any authorised purpose with your express consent.

1.6 Direct marketing materials

We may send you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the *Spam Act 2003* (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and we will

then ensure that your name is removed from our mailing list. We do not provide your personal information to other organisations for the purposes of direct marketing.

1.7 How can you access and correct your personal information?

You may request access to any personal information we hold about you at any time by contacting us (see the details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We may charge you a fee to cover our administrative and other reasonable costs in providing the information to you. We will not charge for simply making the request and will not charge for making any corrections to your personal information.

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would have an unreasonable impact on the privacy of others or if it would be unlawful. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment, then we will add a note to the personal information stating that you disagree with it.

1.8 What is the process for complaining about a breach of privacy?

If you believe that your privacy has been breached, please contact us using the contact information below and provide details of the incident so that we can investigate it and respond to you about your concerns.

1.9 Do we disclose your personal information to anyone outside Australia?

We may disclose personal information to our related bodies corporate and third-party suppliers and service providers located overseas for some of the purposes listed in section 1.5. This includes:

- our related bodies corporate, located in New Zealand, United Kingdom of Great Britain and Northern Ireland, Republic of the Philippines, United States of America, Canada and the United Arab Emirates;
- our data hosting and other IT service providers, located in United Kingdom of Great Britain and Northern Ireland, United States of America, Canada, Singapore, Republic of the Philippines, Serbia and the United Arab Emirates; and
- other third parties located in New Zealand, United Kingdom of Great Britain and Northern Ireland, Serbia, Republic of the Philippines, Brazil and China.

We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

1.10 Security

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure. We may hold your information in either electronic or hard copy form. Personal information is destroyed or de-identified when no longer needed.

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

1.11 Links

Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third-party website and we are not responsible for the privacy policies or the content of any third-party website. Third party websites are responsible for informing you about their own privacy practices.

1.12 Contacting us

If you have any questions about this privacy policy, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please use the contact link on our website or contact our Privacy Officer using the details set out below.

We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in timely and appropriate manner. Please contact our Privacy Officer at:

Privacy Officer

Tribal Group Pty Limited

Post: West 7-8 Federal Mills Park, 3-35 Mackey Street North Geelong, VIC, 3215

Tel: +61 (03) 5221 5535

Email: dataprivacy@tribalgroup.com

1.13 Changes to our privacy policy

We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website.

This privacy policy was last reviewed on 02 February 2021.