Privacy Policy

1. General Statement

1.1 Skodel Technology Pty Ltd (**Skodel**) respects the privacy of all individuals. This privacy policy outlines Skodel's approach to privacy and how Skodel collects, stores, uses and protects your personal information. It also sets out your rights in relation to accessing the personal information we collect and hold about you. We are bound by the National Privacy Principles in the *Privacy Act 1988* (Cth).

If you are under the age of 18, please be sure to read this Privacy Policy with a parent or guardian.

1.2 Personal information is defined in the *Privacy Act 1988* (Cth) and means information or an opinion about an individual whose identity is apparent or can be reasonably ascertained from that information or opinion.

1.3 Our website may contain links to third party websites. We are not responsible for the privacy policies of any third party websites. We recommend that you review the privacy policy of each website you visit.

2. Collection of Personal Information

2.1 Skodel only collects personal information for the purposes of supplying services to you. The personal information Skodel collects may include:

a) **Information you provide us with:**

We collect and store any information you knowingly provide us with when using our services, whether that be on mobile, computer or any other means. That information may include, without limitation, personal information such as your name, email address, organisation affiliation, profile picture and any other information necessary for us to provide our services.

b) **Information other users provide us with:**

We may collect information other users provide us about you, which can include personal information. This is generally the case when an organisation manager provides us with personal information about people in their organisation in order to create an account with Skodel. For example, email, first name and last name.

c) **Information collected automatically:**

We collect and store certain types of usage information when you interact with our services. This information is not personal information. We collect usage information about things such as questions answered, time spent answering questions, order in which you select responses, the number of questions completed and trend over time in negative, neutral or positive emotions stated.

d) **Information from integrated services:**

To make it easier and save time for users, Skodel allows for single-sign-on (SSO) for various platforms. If you choose to login through SSO or otherwise via an integrated service such as Google, Microsoft or other, then Skodel may collect personal information that is already associated with your integrated service account. By choosing to provide such information, you are giving Skodel permission to use, share and store it in a manner consistent with this Privacy Policy.

e) **Location information**

We collect information about which state or country you are in to tailor our question format to your location.

2.2 Skodel will only collect personal information from you by lawful and fair means and not in an unreasonably intrusive way.

3. Using and Disclosing Personal Information

3.1 We will generally use or disclose your personal information only for the primary purpose for which it was collected; or for a related secondary purpose where you would reasonably expect us to use or disclose the personal information for that secondary purpose. We may otherwise use and disclose your personal information if you have given us consent for the use or disclosure or it is required or authorised by law.

3.2 Generally, we use and disclose your personal information for the following purposes:

a) **To provide a service to you**

Skodel uses information to be able to provide our services to you. For example, to create a Skodel account, we may need to collect personal information such as name and email address.

b) **To enhance the services we provide**

Skodel uses the personal information to better the service we provide you. We collect and store relevant data when users complete check-ins on our platform, so that we can provide

leaders with relevant insights into how people are feeling across their organisation. An example of this is how we store previous stated emotions on check ins to provide leaders with meaningful insight into positivity over time.

c) **As testimonial**

Under certain circumstances and only with consent from you, we may post your personal information on our website. This would only include your name, title and what you have said about our services. We may also collect anonymous survey data relating to how likely you are to recommend Skodel. This would be aggregated and may be published on our website as percentage figure.

d) **Organisation ownership of data**

Organisations will be able to download a CSV file with key user activity. This data is owned by the organisation and will continue to be the property of and under the control of that organisation.

e) **Shared with other users**

Skodel shares certain information with other users to allow leaders within an organisation to work together seamlessly. An example of this is the development of successful intervention strategies - these are made available for other leaders within the same organisation.

f) **Retaining data**

User accounts can only be deleted by leader accounts. When a user account is deleted, all the data is deleted with it, however, we may hold the data on our backup databases for a period of up to 90 days. After 90 days, all information from the deleted account will be removed from our database. Leaders can delete their accounts at any time. You have the right to request that our company restrict the processing of your personal data, under certain conditions.

g) **Understand usage**

Skodel automatically collects and stores information on our server logs from your browser, including Skodel cookie information, your IP address and pages visited. Cookies are alphanumeric identifiers that we transfer to your computer or mobile device. These are transferred, whether you are registered member or not and are used to help us gain an understanding of how our users are using our services. This enables us to tailor your own experience and create a better experience for our other users. If you wish to change your cookie settings, you can do so but this is dependent on the browser you are using, so we suggest looking at the 'help' section for the browser you are using. For more information on

cookies, we recommend visiting Google Adsense. For more information about cookies, please visit allaboutcookies.org.

h) **Types of cookies we use**

We use the following types of cookies for the purposes explained below:

1. Essential Operational. These cookies are necessary to allow us to operate Skodel as you have requested. For example, they let us recognise what type of user you are and then provide you with services accordingly.
2. Performance and Analytics. We use these cookies to analyse how Skodel is accessed, is used, or is performing. We use this information to maintain, operate, and continually improve Skodel. We may also obtain information from our email newsletters, including whether you opened or forwarded a newsletter or clicked on any of its content. This information tells us about our newsletters' effectiveness and helps us ensure that we're delivering information that you find informative.
3. Functional. These cookies let us operate certain functions of Skodel in line with the choices you make. These cookies mean that when you continue to use or come back to Skodel, we can provide you with our services as you have asked for them to be provided, such as knowing your username, remembering how you have customised our services, and reminding you of content you have recently viewed.
4. Third Party. We may allow our business partners to use cookies on or outside the Skodel Service for the same purposes identified above, including collecting information about your online activities over time and across different websites. We may also use service providers acting on our behalf to use cookies for the purposes identified above.

i) **Assist with fixing bugs and customer issues**

We use a variety of third-party services to help with bug detection, understand usage and monitor server performance. Such services include Google Analytics and Sentry and we may share certain information with these providers to assist in identifying and fixing bugs, customer support and improving our services. Except for the purposes provided in this Privacy Policy, Skodel will not disclose the information we collect from you to third parties without your express written permission, or where we believe, in good faith, that the law requires us to disclose the information.

j) **Marketing and or potential investors**

To assist in running more effective marketing campaigns or raising capital, we may share aggregated information with marketing professionals or potential investors. Users will remain **anonymous**. We store session information on our website, such as the pages you viewed, for the purposes of re-marketing to potential customers. This information remains

anonymous and we will never knowingly advertise to existing organisation users in this manner.

We may market to potential clients if you have opted in to receive marketing, you can opt out at a later date. You have the right at any time to stop our company from contacting you for marketing purposes.

k) **We may share data when legally required or to protect Skodel or others**

Skodel may disclose personal information when required by law. We may also disclose information, in good faith, to protect Skodel from third party allegations or to protect the property or safety of our users.

4. Security of your personal information

Data and information security is a priority for Skodel and we have gone to great lengths to ensure our systems are secure and your information is protected. We take steps to protect the personal information we hold against loss, unauthorised access, use, modification or disclosure and against other misuse. This includes the use of services from respected cyber security professionals. When no longer required, personal information is destroyed in a secure manner or deleted.

4.1 Protecting your personal information

Your personal information on your Skodel account is protected by a password set by you for your privacy and security. Selecting and protecting a more secure password will help prevent the threat of unauthorised access.

On top of this, we also have in place a number of physical and technical security measures to help prevent the threat of an attack on our own services. Whenever you enter sensitive information on our website, we encrypt the transmission of that information using a secure socket layer (SSL). We endeavour to protect all your information in order to keep this private, however, no transmission of information through web services can be guaranteed to be 100% secure. Given this, we cannot guarantee the security of your information and any information you do provide Skodel which is done so at your own risk. In a case where your information may be compromised, you will be notified electronically.

Skodel is hosted in Australia by Google Cloud. Laws on data protection differ from country to country, so be aware that if you are not based in Australia and provide us with information, your data will be transferred to Australia, which may have different data protection laws. For organisations that wish to store data locally, Skodel has multi-region storage to accommodate such instances.

5. Access to Your Personal Information

5.1 What personal information can I update and or view?

Skodel acknowledges an individual's right to access and update their personal data. You can access and update much of this personal information in your account settings online. If you are after other personal information that is not accessible to you, you can contact us and we will look into this matter. There may be cases where we are unable to release certain personal information to you and in such cases, you will be given the reasons as to why. If you feel certain personal information is not correct and you are unable to update it, you can contact us and we will investigate such cases.

6. Changes to the Privacy Policy

We may make changes to this Privacy Policy from time to time for any reason. In such cases where changes diminish the privacy rights of our users, we will notify users via email. Please ensure the email attached to your Skodel account is valid and you are able to receive email, otherwise, you will not receive information on such updates.

Want to make a complaint?

If you feel we have not been compliant with this Privacy Policy or are unhappy with the way we handle personal information, you can contact us at any time and we will respond within a reasonable period of time. Every complaint is taken seriously and we will do our best to resolve such issues. In cases where we are unable to do so, there are additional steps you can take if you wish to escalate the matter and we will advise you on this.

Contact us at info@skodel.com