# Welcome to the Kickstart-Factory Privacy Policy

When you use Kickstart-Factory services you trust us with your information. This Privacy Policy is meant to help you understand what data we collect, why we collect it, and what we do with it. This is important; we hope you will take time to read it carefully. And remember, you can find controls to manage your information and protect your privacy and security.

# **Privacy Policy**

Last modified: December 18, 2017

There are many different ways you can use our services – to maintain your Digital Work Passport in the Cloud rather than relying on your paper CV. You decide if you want to keep that private and download the CV when you need it or, by paying a subscription fee, you agree to let us share your electronic CV to prospective employers.

Your subscription fee is your approval to display your content to countries of your choice and within country of your choice, states within the country.

When you share information with us, for example, by creating a **Kickstart-Factory Profile**, we can make career services even better; we will show you alternate careers and point you to education and development organizations, and help you connect with them to make sharing your details with them quicker and easier. You are in control; you decide what can be made visible to future employers to minimize the number of jobs pushed to you that do not suit your future job preferences. You can request to not show your details to your current employer or prior employers.

As you use our services, we want you to be clear how we are using information and the ways in which you can protect your privacy.

Our Privacy Policy explains:

- What information we collect and why we collect it.
- How we use that information.
- The choices we offer, including how to access and update information.

We have tried to keep it as simple as possible, we do not use cookies, IP addresses, pixel tags and browsers. Your privacy matters to Kickstart-Factory so, whether you are new to Kickstart-Factory or a long-time user, please do take the time to get to know our practices – and if you have any questions contact us.

#### Information we collect

We collect information to provide better services to all of our users – from figuring out basic details like which language you speak, to more complex things like which jobs are of interest to you and which jobs you never want to do again.

We collect information in the following ways:

INFORMATION YOU GIVE US We require you to sign up for a Kickstart-Factory
Account. When you do, we will ask for personal information, like your name, email
address, telephone number, prior jobs held and skills gained. We do not store <u>credit</u>
card details, we are linked with in-app purchase for iOS Apple, and in-app Billing for
Android.

Sensitive personal information; this is a particular category of personal information relating to confidential medical facts, racial or ethnic origins, political or religious beliefs or sexuality do not form part of your profile and is not stored in Kickstart-Factory.

The documents you do load relate only to work experience or work preferences and they are retained by us as proof of your electronic CV.

#### Unique device identifier

A unique device identifier (sometimes called a universally unique ID or UUID) is a string of characters that is incorporated into a device by its manufacturer and can be used to uniquely identify that device (for example an IMEI-number of a mobile phone). Different device identifiers vary in how permanent they are, whether they can be reset by users, and how they can be accessed. A given device may have several different unique device identifiers. Unique device identifiers can be used for various purposes including security and fraud detection, remembering your preferences and providing relevant location information for jobs being pushed to you that are near you. You are in control, you can turn LOCATE me on or off.

INFORMATION WE GET FROM YOUR USE OF OUR SERVICES We collect information
 directly from education bodies when you gain accreditation for a course attended, as
 long as they are a participant in our eco system. You can also load that information
 through our mobile app. Our service includes our team validating the skill, course or
 work done that you load against the document you upload. This changes your skill
 from "Not Verified" to "Verified", increasing your chances of future employment
 being pushed to you through Kickstart-Factory.

### • WE STORE THE RESULTS OF PULSE SURVEYS

- Surveys you complete for companies you have worked for
- o Results from the supervisor when you complete work for a company

If you get a negative review, we force the supervisor to provide a snapshot as to why you got the negative review. This helps you to improve in certain areas to ensure you never get another negative review.

#### DEVICE INFORMATION

We collect hours worked on completion of a job plus we increase number of times skill used by one. This ensures your CV is always current. Skills gained can include:

- Industry
- Equipment type
- Size of business
- Country, state and region where work was performed
- Skills used
- Skills gained

#### LOG INFORMATION

This includes:

- Details of job offers made to you
- Jobs accepted by you
- o Jobs accepted where you were not the selected person

#### Location information

When you use Kickstart-Factory services, we <u>may collect and process</u> <u>information about your actual location</u>. We use various technologies to determine location, including IP address, GPS <u>and other sensors</u> that may, for example, provide Kickstart-Factory with information on nearby devices, <u>Wi-Fi</u> access points and cell towers.

You manage whether you want us to see you, by turning locate me ON or OFF.

#### Cookies and similar technologies

We <u>and our partners</u> use various technologies to collect and store information when you visit a Kickstart-Factory service, and this may include using **cookies or** similar technologies to identify your browser or device.

Information we collect when you are signed in to Kickstart-Factory, in addition to information we obtain about you from partners, may be associated with your Kickstart-Factory Account. When information is associated with your Kickstart-Factory Account we

treat it as personal information. For further details about how you can access, manage or delete information that is associated with your Kickstart-Factory Account.

### How we use information we collect

We use the information we collect from all of our services to <u>provide</u>, <u>maintain</u>, <u>protect</u> and improve them; to <u>develop new ones</u> and to <u>protect Kickstart-Factory and our users</u>. We also use this information to offer you tailored content – like giving you more relevant search results.

We may use the name you provide for your Kickstart-Factory Profile across all of the services we offer that require a Kickstart-Factory Account. In addition, we may replace past names associated with your Kickstart-Factory Account so that you are represented consistently across all our services. If other users already have your email, or other information that identifies you, we may show them your publicly visible Kickstart-Factory Profile information, such as your name and photo.

If you have a Kickstart-Factory Account we may display your Profile name, Profile photo, and actions you take on Kickstart-Factory, or on third-party applications connected to your Kickstart-Factory Account, such as Time and Attendance, Scheduling and Payroll from companies in the eco system, who have hired you.

When you contact Kickstart-Factory we keep a record of your communication to help solve any issues you might be facing. We may use your mobile device or email address to inform you about our services, such as letting you know about upcoming changes or improvements.

We use information collected from cookies and other technologies, like <u>pixel tags</u>, to <u>improve your user experience</u> and the overall quality of our services. One of the products we use to do this on our own services is Kickstart-Factory Analytics. For example, by saving your language preferences, we will be able to have our services appear in the language you prefer. When showing you tailored job offers or advertisements, we will not associate an identifier from cookies or similar technologies with sensitive categories, such as those based on race, religion, sexual orientation or health. Our database does not have such information stored against profiles.

We will ask for your consent before using information for a purpose other than those that are set out in this Privacy Policy.

Kickstart-Factory processes personal information on our servers in many countries around the world. We may process your personal information on a server located outside the country where you live. You choose which countries you want your details to be made available to display in those countries. The server is located in Australia.

### **Transparency and choice**

People have different privacy concerns. Our goal is to be clear about what information we collect, so that you can make meaningful choices about how it is used. For example, you can:

- Review and update your Kickstart-Factory activity controls to decide what types of data, such
  as jobs held with prior companies, you would like saved along with documented proof on your
  Digital Work Passport.
- Review and control certain types of information tied to your Kickstart-Factory Account by using Kickstart-Factory Dashboard.
- Adjust how the Profile associated with your Kickstart-Factory Account appears to others.

You may also set your browser to block all cookies, including cookies associated with our services, or to indicate when a cookie is being set by us. However, it is important to remember that many of our services <u>may not function properly</u> if your cookies are disabled. For example, we may not remember your language preferences.

### Information you share

Many of our services let you share information with others. Remember that when you share information publicly, it may be indexable by search engines, including Kickstart-Factory. Our services provide you with different options on sharing and hiding your content.

### Accessing and updating your personal information

Whenever you use our services, we aim to provide you with <u>access to your personal</u> <u>information</u>. If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes.

We aim to maintain our services in a manner that protects information from accidental or malicious destruction. Because of this, after you delete information from our services, we may not immediately delete residual copies from our active servers and may not remove information from our backup systems. We do this in case you did not want to delete it.

### Information we share

We do not share personal information with companies, organizations and individuals outside of Kickstart-Factory unless one of the following circumstances applies:

With your consent

We will share personal information with companies, organizations or individuals outside of Kickstart-Factory when we have your consent to do so. We require opt-in consent for the sharing of any *sensitive personal information*.

#### With domain administrators

If your Kickstart-Factory Account is managed for you by a *domain administrator* (for example, recruiters or our own support team that you have signed a privacy document with) then your domain administrator and resellers who provide user support to your organization will have access to your Kickstart-Factory Account information (including your email, mobile device, skills and job held). Your sensitive information, such as personal details including address, is never shared. The domain administrator may be able to:

- view statistics regarding your account, for example, statistics regarding applications sent to you
- change your account password
- o suspend or terminate your account access
- o access or retain information stored as part of your account
- receive your account information in order to satisfy applicable law, regulation, <u>legal</u>
   process or enforceable governmental request
- o restrict your ability to delete or edit information or privacy settings.

### For external processing

We provide personal information to our affiliates, or other trusted businesses or persons, to process it for us based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.

Your personal information is used to create an employment record with the company you have accepted a job from.

#### For legal reasons

We will share personal information with companies, organizations or individuals outside of Kickstart-Factory if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

- Meet any applicable law, regulation, <u>legal process or enforceable governmental</u> request
- o Enforce applicable Terms of Service, including investigation of potential violations
- o Detect, prevent, or otherwise address fraud, security or technical issues
- Protect against harm to the rights, property or safety of Kickstart-Factory, our users or the public as required or permitted by law.

We may share non-personally identifiable information publicly and with our partners – like publishers, advertisers or connected sites. For example, we may share information publicly to show trends about the general use of our services.

If Kickstart-Factory is involved in a merger, acquisition or asset sale, we will continue to ensure the confidentiality of any personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

## Information security

We work hard to protect Kickstart-Factory and our users from unauthorized access to or unauthorized alteration, disclosure or destruction of information we hold. In particular:

- We encrypt many of our services using SSL.
- We offer you two step verification when you access your Kickstart-Factory Account and a Safe Browsing feature in Kickstart-Factory Chrome.
- We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.
- We restrict access to personal information to Kickstart-Factory employees, contractors and
  agents who need to know that information in order to process it for us, and who are subject
  to strict contractual confidentiality obligations and may be disciplined or terminated if they
  fail to meet these obligations.

### When this Privacy Policy applies

Our Privacy Policy applies to all of the services offered by Kickstart-Factory Pty Limited and its affiliates, including Growing Team's services provided on iPhone and Android devices, and services offered by Recruitment providers, but excludes services that have separate privacy policies that do not incorporate this Privacy Policy.

Our Privacy Policy does not apply to services offered by other companies or individuals, including products or sites that may be displayed to you in search results, sites that may include Kickstart-Factory services, or other sites linked from our services. Our Privacy Policy does not cover the information practices of other companies and organizations who advertise our services, and who may use cookies, pixel tags and other technologies to serve and offer relevant ads.

# **Compliance and cooperation with regulatory authorities**

We regularly review our compliance with our Privacy Policy. We also adhere to several self-regulatory frameworks, including the EU-US and Swiss-US Privacy Shield Frameworks. When we receive formal written complaints we will contact the person who made the complaint to follow up. We work with the appropriate regulatory authorities, including local data

protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

## **Changes**

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of privacy policy changes). We will also keep prior versions of this Privacy Policy in an archive for your review.

We keep your personal information private and safe — and put you in control.