## **REDBEAR IT**



RedBear IT
Privacy Policy
Version: 1.5
21st July 2021

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#### 1. Overview

This Privacy Policy is currently in place and effective at the time this document was created. It explains where RedBear IT (collectively, "RedBear" or "we" or "us" or "our") collect personal information and why, what we do with that information, how we share it, and how we handle the personal information created, inputted, submitted, posted, transmitted, stored by RedBear.

If there are any material changes to this Policy, affected persons will be notified by email, or by posting a prominent notice on our website prior to the change becoming effective. We encourage everyone to periodically review the website for the latest information on our privacy practices. Continued engagement with RedBear constitutes an agreement to be bound by such updates and/or changes to this Policy. The only remedy, for those do not accept the terms of this Policy, is to discontinue engagement with RedBear IT, and to request destruction of any personal information held by RedBear IT.

#### 1.1 Information Covered by This Policy

We respect and protect the privacy of any authorised users of our platform and services. This Policy explains the what, how and why of the personal information that we collect when using relevant services or associated services. The personal information collected and used by RedBear IT, is limited to the purpose for which our clients, prospects and vendors engage any member of RedBear and other purposes expressly described in this Policy.

#### 1.2 What this Policy Covers:

This policy covers:

- The websites that link to this Policy, including: <a href="https://www.redbearit.com">https://www.redbearit.com</a>.au;
- Hosts, sites and databases owned by or under the control of RedBear IT, such as may be present on any instance hosted within a client's or RedBear's AWS environment(s);
- Personal Data accessible by RedBear IT on any client's site.

#### 1.3 Collection of personal information

RedBear IT does not collect personal information beyond that contained on a business card unless it is necessary to provide or assist in providing a service to the relevant person.

#### 1.4 What Do We Mean by Personal Information?

In this Policy, personal information means information relating to an identified or identifiable individual user of the underlying platform or service. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, economic, cultural or social identity.



## Use of Personal Information

### 2.1 Information provided by a person

Except as described in this Policy, the RedBear group will not give, sell, rent or loan any personal information to any third party. We do not permit our service providers to use the personal information that we share with them for their marketing purposes or for any other purpose than in connection with the services they provide to us.

# 2.2 Information provided by another service provider

We do not use the personal information that has been shared by our clients for any purpose than in connection with the services we provide to them.

### Personal Information Provided to Us or That We Collect

#### 3.1 Account Information

When a user logs on to our systems, we may ask for personal information such as that person's name, address, phone number, e-mail address, instant messaging ID, as well as certain related information like a company name and website name. We also collect personal information such as an email address and a name or alias from any individual authorized to interact with our services through an automated feed/API. When voluntarily providing us with Account Information, users must represent that they are the owner of such personal information or are otherwise authorized it to provide it to us.

#### 3.2 Credit Card information

RedBear IT does not collect, store, retain, or use Credit Card or other billing information for any reason in the normal course of business. An exception may be made, at a client's explicit request, in response to an emergency. If, under extraordinary circumstances were to have knowledge of a client's Credit Card or other billing information, the following conditions apply:

- Such information will be used only for the purposes of ensuring continuation or resumption of service, or prevention of data loss;
- Such information will not be stored unless request;
- If stored, it will be stored for not longer than required to alleviate the extraordinary circumstances;
- If stored, it will be encrypted with high-strength encryption with keys that are encrypted in storage and transmission;
- It will only be transmitted over encrypted channels.

#### 3.3 Service Data

We collect and sometimes store information that is created, inputted, submitted, posted, transmitted, stored or displayed by users and client's End-Users in the process of using relevant services. Such information may include personal information or other sensitive information that they choose to include. We refer to any information described above as "Service Data" for purposes of this Policy. All Service Data is subject to our technical safeguards as more fully subscribed in our *Risk Management Policy*.

#### 3.4 Cookies / Tracking Technologies

Our Services use cookies for a variety of purposes. These cookies may provide us with information, including personal information, other information about devices and networks users utilize to access the RedBear IT systems and information regarding interactions with, and in our Website

## 3.5 Log Files from the Use of Our Platform and Services

We may gather certain information automatically and store it in log files. This information includes internet protocol addresses, browser, internet service provider, referring/exit pages, operating system, date/time stamp, and click stream data as well as certain personal information such as user's login names, user email address and other information that may be included in open textual fields. Our application log files are subject to the same strict data security policies and procedures as apply to the application databases for our platform and services.

## 3.6 Analytics Information from the Use of our Websites and Services

We collect analytics information when individuals use our platform and services to help us improve them.

In our platform, analytics information may consist of the feature and function of the Service being used, the associated domain name, the username and IP address of individuals (which may include personal information if the personal information was incorporated into the username) and additional information required to detail the operation of the function and which parts of a Service are being affected. The analytics information we collect may include elements of Service Data related to the function the user or End-User is performing. As such, the analytics information we collect may include personal information or sensitive business information.

#### 3.7 Communications with Us

When individuals send an email or other communication to us, including support requests for our Services, we may collect the personal information that individuals provide us and may use it in order to process inquiries, respond to requests and improve our Services.

#### 3.8 Blogs and Public Forums

Our platform and services may offer community accessible blogs or community forums. Individuals should be aware that any information provided in these areas might be read, collected, and used by others who access them. To request removal of such personal information from our blog or community forum, contact us at info@redbearit.com.au. In some cases, we may not be able to remove some personal information, in which case we will advise if we are unable to do so and why.

#### 3.9 Subscriber Testimonials/Comments/Reviews/Feedback

From time to time, we post subscriber testimonials on our Website that may contain personal information. We obtain the subscriber's consent to post their names along with their testimonials. If subscribers wish to update or delete their testimonial, they can contact us at <a href="mailto:info@redbearit.com.au">info@redbearit.com.au</a>.

### 3.10 Social Media Widgets

In future releases of our services platform and websites we may include Social Media Features, such as the Facebook Like buttons, and Widgets, such as the Share This button or interactive mini-programs that run on our Website and platform. These Features may collect Internet protocol addresses, which page has been visited on our Website and platform, and may set a cookie to enable the feature to function properly. Social Media features and widgets are either hosted by a third party or hosted directly on our website. All interactions with these features are governed by the privacy statement of the company providing it.

# 3.11 Other Information That Individuals Provide Us or We Collect

In addition to personal information, we collect data and other information from visitors to our Websites and the users of our platform and services. This includes, among other things, anonymized information or aggregated data that RedBear may collect about a group or category of Services, features or users while visiting our website or accessing the Services. We define this information as Usage Data. Usage Data helps us understand trends in usage of the services so that we can better consider new features or otherwise tailor our services.



### 4. How We Use Personal Information

#### 4.1 General Uses

We use the personal information that we collect for a variety of purposes including to:

- Provide, operate, maintain, analyze, improve and promote our Services and tailor our Services to our clients' needs;
- Enable our clients to access and use our platform services;
- Assist our clients and their End-Users to access and use our client's services which may itself include process and completing transactions, and send individuals related information, including purchase confirmations and invoices;
- Communicate with individuals, including responding to their comments, questions, and requests; providing client service and support;
- Provide individuals with information about services, features, surveys, newsletters, offers, and events;
- Provide other news or information about us and our select partners; and sending subscribers technical notices, updates, security alerts, and support and administrative messages;
- Monitor and analyze trends, usage, and activities in connection with our services and for marketing or advertising purposes;
- Investigate and prevent fraudulent transactions, unauthorized access to our services, and other illegal activities; and
- •• For other purposes about which we notify subscribers.

#### 4.2 Analysis of our platform and services

As indicated above, we use the information we collect (including log and configuration data) to understand how our platform and services are being configured and used, how they can be improved, and to develop new services, features and functionality.

### 4.3 Sharing Personal Information

#### 4.3.1 Third-party service providers

We share information, including personal information, with our third-party service providers managed hosting providers, sub-processors of Service Data, and technology partners) to provide the necessary hardware, software, networking, storage, and other services that we use to operate our Services and maintain a high quality user experience. We do not permit our service providers to use the personal information that we share with them for their marketing purposes or for any other purpose than in connection with the services they provide to us.

#### 4.3.2 Other Services

Individual may choose to make use of Other Services in conjunction with our platform or services. Other services are third party products, applications, services, software, products, networks, systems, directories, websites, databases and information which our Service links to, or which Individuals may connect to or enable in conjunction with the Services, including, without limitation, other services which may be integrated directly into an Account to which individuals grant access privileges to that account. When access is granted, certain information in the account is shared with the third party, including personal information. RedBear does not control the policies and procedures of these other services even though the other services may be available through our service. This Policy does not cover the collection or use of information, including personal information, by other services, and we urge individuals to consider the privacy policies governing these other services.

## 4.3.3 Compliance with Laws and Law Enforcement Requests; Protection of Our Rights

We disclose personal information to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims. We may also share such information if we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Terms of Service, or as otherwise required by law.

#### 4.4 RedBear Sharing

We may share information, including personal information, with any member of RedBear staff for the purposes stated in this Policy.

#### 4.4.1 Consent

We may share personal information with third parties when we have consent to do so.



## Accessing and Updating Personal Information

Subscribers may access, update or change account Information they have provided by logging into relevant services and providing such additional information where applicable. If individuals are a subscriber and would like to gain access to, or request deletion of information that RedBear has collected as "data controller" please contact us at info@redbearit.com.au. We will respond to such queries within thirty (30) business days.

Individuals seeking access to, or who would like to correct, amend, or delete service data should direct their queries to the applicable subscriber of the service acting as the "data controller" for such information. If requested to remove individual's data by our subscribers, we will respond within thirty (30) business days. Technical limitations may restrict or eliminate our ability to remove or delete certain service data from all system but best endeavours will be taken to do so.