

ADAPT Privacy Policy

1. We respect your privacy

- Welcome to www.adapt.com.au (the 'Website'). The Website for all out Event and Membership (the 'Services') related information and services.
- ADAPT Ventures Pty Ltd respects your right to privacy and is committed to safeguarding the privacy of our customers and website visitors. This policy sets out how we collect and treat your personal information.
- We adhere to the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) and to the extent applicable, the EU General Data Protection Regulation (GDPR).
- "Personal information" is information we hold which is identifiable as being about you. This includes information such as your name, email address, identification number, or any other type of information that can reasonably identify an individual, either directly or indirectly.
- You may contact us in writing at Level 25, 31 Market Street, Sydney, New South Wales, 2000 for further information about this Privacy Policy.
- A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at oaic.gov.au

2. What personal information is collected?

- ADAPT Ventures Pty Ltd will, from time to time, receive and store personal information you submit to our website, provided to us directly or given to us in other forms.
- You may provide basic information such as your name, phone number, address and email address to enable us to send you information, provide updates and process your product or service order.
- We may collect additional information at other times, including but not limited to, when you provide feedback, when you provide information about your personal or business affairs, change your content or email preference, respond to surveys and/or promotions, provide financial or credit card information, or communicate with our customer support.
- Additionally, we may also collect any other information you provide while interacting with us.

3. How we collect your personal information

- ADAPT Ventures Pty Ltd collects personal information from you in a variety of ways, including when you interact with us electronically or in person, when you access our website and when we engage in business activities with you. We may receive personal information from third parties. If we do, we will protect it as set out in this Privacy Policy.
- By providing us with personal information, you consent to the supply of that information subject to the terms of this Privacy Policy.
- For information regarding ADAPT's Cookies policy, please see [here](#).

4. How we use your personal information

- Where ADAPT Ventures Pty Ltd uses collected data in the development or delivery of products, ADAPT commits to make every reasonable effort to complete the following:
 1. remove any identifying information from all data;
 2. refrain from using individual data; and
 3. use only summary data for the purpose of analysis, benchmarking, industry trends and other similar uses.
- ADAPT's primary aim is to use data to create a better experience for our customers and potential customers where interacting with ADAPT
 4. In person;
 5. Over the phone
 6. Digital Products and Services
- ADAPT Ventures Pty Ltd may use personal information collected from you to provide you with information about our products or services. We may also make you aware of new and additional products, services and opportunities available to you.
- ADAPT Ventures Pty Ltd will use personal information only for the purposes that you consent to. This may include to:
 7. provide you with products and services during the usual course of our business activities;
 8. administer our business activities;
 9. manage, research and develop our products and services;
 10. provide you with information about our products and services;
 11. communicate with you by a variety of measures including, but not limited to, by telephone, email, SMS or mail; and
 12. investigate any complaints.
- If you withhold your personal information, it may not be possible for us to provide you with our products and services or for you to fully access our website.
- We may disclose your personal information to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, legal proceedings or in response to a law enforcement agency request.
- If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our user databases, together with any personal information and non-personal information contained in those databases.
- At times ADAPT may send you emails that you may be interested in. ADAPT may occasionally contact you in this manner, only if you have given your consent. Please note consent is attained through the following circumstances:
 13. where you have given ADAPT direct consent, via telephone, email, in writing or when prompted within an event, survey or other collection form
 14. where ADAPT has stated that your consent is required as part of the terms and conditions of a service or product offering

15. where a direct relationship has been established, via your attendance of an ADAPT event. Please note in this circumstance, consent is only recorded for that specific product series

16. where a colleague provides your email address as a means of referral

5. **Disclosure of your personal information**

- ADAPT Ventures Pty Ltd may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this privacy policy.
- If we do disclose your personal information to a third party, we will protect it in accordance with this privacy policy.

6. **General Data Protection Regulation (GDPR) for the European Union (EU)**

- ADAPT Ventures Pty Ltd will comply with the principles of data protection set out in the GDPR for the purpose of fairness, transparency and lawful data collection and use.
- We process your personal information as a Processor and/or to the extent that we are a Controller as defined in the GDPR.
- We must establish a lawful basis for processing your personal information. The legal basis for which we collect your personal information depends on the data that we collect and how we use it.
- We will only collect your personal information with your express consent for a specific purpose and any data collected will be to the extent necessary and not excessive for its purpose. We will keep your data safe and secure.
- We will also process your personal information if it is necessary for our legitimate interests, or to fulfil a contractual or legal obligation.
- We process your personal information if it is necessary to protect your life or in a medical situation, it is necessary to carry out a public function, a task of public interest or if the function has a clear basis in law.
- We do not collect or process any personal information from you that is considered "Sensitive Personal Information" under the GDPR, such as personal information relating to your sexual orientation or ethnic origin unless we have obtained your explicit consent, or if it is being collected subject to and in accordance with the GDPR.
- You must not provide us with your personal information if you are under the age of 16 without the consent of your parent or someone who has parental authority for you. We do not knowingly collect or process the personal information of children.

7. **Your rights under the GDPR**

- If you are an individual residing in the EU, you have certain rights as to how your personal information is obtained and used. ADAPT Ventures Pty Ltd complies

with your rights under the GDPR as to how your personal information is used and controlled if you are an individual residing in the EU

- Except as otherwise provided in the GDPR, you have the following rights:
 1. to be informed how your personal information is being used;
 2. access your personal information;
 3. to correct your personal information if it is inaccurate or incomplete;
 4. to delete your personal information (also known as "the right to be forgotten");
 5. to restrict processing of your personal information;
 6. to retain and reuse your personal information for your own purposes;
 7. to object to your personal information being used; and
 8. to object against automated decision making and profiling.
- Please contact us at any time to exercise your rights under the GDPR at the contact details in this Privacy Policy. We may ask you to verify your identity before acting on any of your requests.

8. **Hosting and International Data Transfers**

- Information that we collect may from time to time be stored, processed in or transferred between parties or sites located in countries outside of Australia.
- We and our other group companies have offices and/or facilities in Australia. Transfers to each of these countries will be protected by appropriate safeguards, these include one or more of the following: the use of standard data protection clauses adopted or approved by the European Commission which you can obtain from the European Commission Website; the use of binding corporate rules, a copy of which you can obtain from ADAPT Ventures Pty Ltd.'s Data Protection Officer.
- The hosting facilities for our website are situated in Australia. Transfers to each of these Countries will be protected by appropriate safeguards, these include one or more of the following: the use of standard data protection clauses adopted or approved by the European Commission which you can obtain from the European Commission Website; the use of binding corporate rules, a copy of which you can obtain from ADAPT Ventures Pty Ltd.'s Data Protection Officer.
- Our Suppliers and Contractors are situated in Australia. Transfers to each of these Countries will be protected by appropriate safeguards, these include one or more of the following: the use of standard data protection clauses adopted or approved by the European Commission which you can obtain from the European Commission Website; the use of binding corporate rules, a copy of which you can obtain from ADAPT Ventures Pty Ltd.'s Data Protection Officer.
- You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

9. **Security of Your Personal Information**

- ADAPT Ventures Pty Ltd is committed to ensuring that the information you provide to us is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.
- Where we employ data processors to process personal information on our behalf, we only do so on the basis that such data processors comply with the requirements under the GDPR and that have adequate technical measures in place to protect personal information against unauthorised use, loss and theft.
- The transmission and exchange of information is carried out at your own risk. We cannot guarantee the security of any information that you transmit to us or receive from us. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that personal information that we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

10. **Access to Your Personal Information**

- You may request details of personal information that we hold about you in accordance with the provisions of the Privacy Act 1988 (Cth), and to the extent applicable the EU GDPR. If you would like a copy of the information which we hold about you or believe that any information we hold on you is inaccurate, out of date, incomplete, irrelevant or misleading, please email us at info@adapt.com.au.
- We reserve the right to refuse to provide you with information that we hold about you, in certain circumstances set out in the Privacy Act or any other applicable law.

11. **Complaints About Privacy**

- If you have any complaints about our privacy practices, please feel free to send in details of your complaints to info@adapt.com.au. We take complaints very seriously and will respond shortly after receiving written notice of your complaint.
- Changes to Privacy Policy
- Please be aware that we may change this Privacy Policy in the future. We may modify this Policy at any time, in our sole discretion and all modifications will be effective immediately upon our posting of the modifications on our website or notice board. Please check back from time to time to review our Privacy Policy.

12. **Website**

- When you come to our website (www.adapt.com.au), we may collect certain information such as browser type, operating system, website visited immediately before coming to our site, etc. This information is used in an aggregated manner to analyse how people use our site, such that we can improve our service.
- We may from time to time use cookies on our website. Cookies are very small files which a website uses to identify you when you come back to the site and to store details about your use of the site. Cookies are not malicious programs that access or damage your computer. Most web browsers automatically accept

cookies, but you can choose to reject cookies by changing your browser settings. However, this may prevent you from taking full advantage of our website. Our website may from time to time use cookies to analyse website traffic and help us provide a better website visitor experience. In addition, cookies may be used to serve relevant ads to website visitors through third party services such as Google AdWords. These ads may appear on this website or other websites you visit.

- Our site may from time to time have links to other websites not owned or controlled by us. These links are meant for your convenience only. Links to third party websites do not constitute sponsorship or endorsement or approval of these websites. Please be aware that ADAPT Ventures Pty Ltd is not responsible for the privacy practices of other such websites. We encourage our users to be aware, when they leave our website, to read the privacy statements of each website that collects personal identifiable information
- ADAPT will take reasonable steps to protect your personal information from misuse and loss and from unauthorised access, modification or disclosure.

13. **Disclosure of information**

- ADAPT's primary aim is to use survey data to enable better onsite experience during our events. From attendee feedback, completing surveys greatly improved the return on investment for ADAPT event delegates. To better qualify 1-1 meetings and ensure that strategic partners can add value, survey information will be shared with our partners prior to the event. Our strategic partners are briefed pre-event in best practice for handling survey data
- For disclosure of information to 3rd parties, please note:
 1. ADAPT will not share your information with our partner network if you specifically request for us not to
 2. where ADAPT uses 3rd party analysts, ADAPT will make effort to remove identifying information that would link you to the survey
 3. by accepting an event invitation and completing a survey, you are consenting to this information being used to improve your onsite experience, as outlined in these terms
 4. ADAPT will not share your information if you have specifically stated that your data should not be shared with our partner network
 5. ADAPT will remove your information from our distribution to strategic partners on your request, however, ADAPT will not be able to retract information that has already been disseminated

14. **Post Event Database**

After attending an event, you will be added to ADAPT's Post Event Database. The primary use of this database is to allow continued engagement from onsite and virtual strategic partners. ADAPT encourages strategic partners to only reach out post-event if they met you on-site or you requested to meet with them. Information shared includes; Name, company, job title, email, office line and address. ADAPT DOES NOT share mobile numbers with strategic partners or any external 3rd parties, unless you have agreed to share that data at point of registration.

15. **Mobile Applications**

- When you use our applications, we may collect certain information such as mobile unique device ID, the IP address of your mobile device, mobile operating system, the type of mobile internet browsers you use, and information about the way you use the Application. This information is used in an aggregated manner to analyse how people use our site, such that we can improve our service.
- We may from time to time use cookies in our applications. Cookies are very small files which a website uses to identify you when you come back to the application and to store details about your use of the application. Cookies are not malicious programs that access or damage your computer, tablet or smartphone. Most devices automatically accept cookies, but you can choose to reject cookies by changing your device settings. However, this may prevent you from taking full advantage of our application.
- The Application may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile devices unique device ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browsers you use, and information about the way you use the Application.
- Our mobile application may from time to time have links to other applications or websites not owned or controlled by us. These links are meant for your convenience only. Links to third party applications and websites do not constitute sponsorship or endorsement or approval of these third parties. Please be aware that ADAPT is not responsible for the privacy practices of other such applications or websites. We encourage our users to be aware, when they leave our application or website, to read the privacy statements of each application or website that collects personal identifiable information.

16. **Access to your Personal Information**

- Should you wish to access, update or correct any personal information held in ADAPT's systems, please notify ADAPT in writing and a client service representative will be assigned to fulfil your request.
- In rare cases, ADAPT may charge an administrative fee for providing a copy of your personal information.
- In order to protect your personal information, ADAPT may require identification before releasing the requested information.

17. **Payment**

- Where the option is given to you, you may make payment of the Subscription Fee by way of:
 - Credit card
 - Electronic funds transfer
- All credit card payments made in the course of your use of the Services are made using Stripe. In using the Website, the Services or when making any payment in relation to your use of the Services, you warrant that you have read,

understood and agree to be bound by the Stripe terms and conditions which are available on their website.

- You acknowledge and agree that where a request for the payment of the Subscription Fee is returned or denied, for whatever reason, by your financial institution or is unpaid by you for any other reason, then you are liable for any costs, including banking fees and charges, associated with the Subscription Fee.
- You agree and acknowledge that ADAPT Ventures Pty Ltd can vary the Subscription Fee at any time and that the varied Subscription Fee will come into effect following the conclusion of the existing Subscription **Period**.

18. **Refund Policy**

- ADAPT Ventures Pty Ltd will only provide you with a refund of the Subscription Fee in the event they are unable to continue to provide the Services or ADAPT Ventures Pty Ltd. decides, at its absolute discretion, that it is reasonable to do so under the circumstances. Where this occurs, the refund will be in the proportional amount of the Subscription Fee that remains unused by the Member (the 'Refund').

19. **Independent Legal Advice**

- Both parties confirm and declare that the provisions of the Terms are fair and reasonable and both parties having taken the opportunity to obtain independent legal advice and declare the Terms are not against public policy on the grounds of inequality or bargaining power or general grounds of restraint of trade.

20. **Severance**

- If any part of these Terms is found to be void or unenforceable by a Court of competent jurisdiction, that part shall be severed, and the rest of the Terms shall remain in force.

21. **Contact Details**

- Should you wish to contact ADAPT in relation to any of the information contained within this Privacy Policy, or to seek access to information ADAPT may hold on you, you may do so by emailing info@adapt.com.au. ADAPT may need proof of identification before releasing any data.