



Privacy Policy Version 1.4

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## Contents

1. About this policy .....	2
2. Collection of personal information .....	2
Collection of personal information from our website, emails, apps and social media .....	7
3. Use of personal information .....	9
4. Communications .....	11
5. Disclosure of your personal information .....	12
Courses .....	12
Other disclosures.....	13
6. Security of personal information .....	15
7. Retention of personal information .....	15
8. Access and correction .....	15
9. Contact details and concerns.....	16
10. Changing this policy .....	16

### 1. About this policy

1.1 This privacy policy (**Policy**) sets out the information handling practices of the Spatial Hub Analytics (**SHA**).

1.2 Personal information refers to information or an opinion about an identified or reasonably identifiable individual, regardless of whether it is recorded in material form or whether it is true or false.

1.3 We handle personal information in accordance with the *Privacy Act 1988* including the Australian Privacy Principles (**Privacy Act**) and this Policy.

### 2. Collection of personal information

2.1 We use the information we collect from you to deliver various products and services, including but not limited to:

(a) confirming the identity of individuals.

(b) contacting individuals.

(c) maintaining an individual's account or subscription with us.

(d) providing product or subscription-based services.

(e) providing information and services through our websites and apps as well as via email, online advertisements, and social media; and

(f) undertaking activities, either directly or through our service providers, such as surveys, and creating new products and services with Partner Developers.

2.2 We collect personal information for the purposes and aims stated in this Policy.

2.3 We collect personal information from our subscribers, commercial partners and 3<sup>rd</sup> party suppliers of information used by our products and services. The nature of such personal information varies, and it is collected in different ways. More information about this is provided below.

2.4 In some instances, you may choose to provide information about another person, for example, the name and contact details of someone who might be interested in becoming a subscriber. If you provide personal information about someone other than yourself to SHA, you must make sure that they have agreed to you providing their personal information to us. We also ask that you make them aware of this Policy, for example by giving them a link to it.

2.5 SHA has special protections in place to keep the personal information that we collect safe and secure. These special protections include:

(a) training our staff to keep your personal information safe and secure.

(b) putting contractual arrangements in place to protect your personal information when we disclose it (please see section 5 for information about disclosures).

(c) implementing separate storage and technical restrictions on who can access the personal information; and

(d) taking reasonable steps to destroy or de-identify your personal information when we no longer require it (for example when a subscription is terminated).

2.6 If SHA does not collect your personal information, we may not be able to provide some or all our products and services to you. You may also find that you do not experience the full extent of our products and services, including our websites and apps.

## 2.7 Subscription information

(a) To become a subscriber, you must complete various subscriber related applications. Such applications request a range of personal information, including name and contact details, and employment. (where you work for a corporate entity or similar).

(b) In some instances, you may start a subscriber application online without completing it. The information that is provided on the incomplete application is also collected by SHA and is used to contact you further about becoming a subscriber.

(c) We also may collect date of birth information on some of these applications to enable us to uniquely identify you in combination with other security elements we may require.

(d) For ongoing subscription management, including requests to upgrade or renew subscriptions, or access new products and services, we may collect personal information from subscribers about:

(i) the reasons for changing their level of subscription,

(ii) with the subscriber's consent, other information relevant to establishing and maintain an account or subscription with SHA.

(e) We may also collect information about subscribers from other sources, but only in circumstances where a subscriber would reasonably expect SHA to do so, or where the subscriber has consented to SHA collecting such personal information from another source, for example by responding to a specific request from SHA or by ticking a box at the time of completing a subscription application.

(f) Examples of personal information collected from other sources include work information or other information from publicly available sources.

(g) Such personal information is required for SHA to verify information on certain subscription related applications.

2.8 Information about event attendance, education, and training – subscribers and non-subscribers. This includes webinars or other public engagements conducted in a digital channel:

(a) When you register your attendance at various events, including conferences and briefings conducted by SHA, you must complete an application. Such applications may (depending on the circumstances) request:

(i) your name, title, contact information, gender, occupation, and location.

(ii) sensitive information such as whether you are a subscriber of SHA or another professional body or association., or health information such as dietary or mobility requirements; and

(iii) information about travel bookings (such as car services, hotel bookings, and local transport requirements).

(b) SHA also collects a record of all attendees at its events.

(c) During an event, SHA may collect images and sound recordings of the event, including of the attendees. Please refer to section 3.11 for further information about how SHA manages the collection of images and recordings.

(d) Where you participate in a course or other training, SHA also collects information about your enrolment, assessment answers and feedback sheets.

## 2.9 Survey information

(a) From time to time, SHA or its service providers may collect personal information from survey participants, whether they are subscribers or not. Such personal information may include name and contact details, gender, career history, location, subscription of a SHA product or other professional body or association, opinions on trends and issues, and specific industries in which you are involved. Specific surveys may collect other types of personal information, however participation in a survey is voluntary, so if you don't want to provide the requested information you don't have to.

(b) SHA will only use the personal information collected through surveys for analytical purposes, to assist with improvement or development of our products and services, and in

relation to external studies conducted in partnership with unrelated third parties, including with other professional subscription organisations and education institutes for research purposes.

## 2.10 Non-subscriber information

(a) To expand SHA's product subscriptions, we collect information about prospective subscribers from existing subscribers who might refer a prospective subscriber to SHA, from publicly available sources such as commercial list brokers.

(b) Information about prospective subscribers will primarily include their name, occupation, location, specific areas of interest, and contact details.

(c) We also collect the name, title, organisation, post nominal, and credentials of any speakers, organisers, hosts, facilitators, or trainers (**Presenters**) which we engage to conduct our events and courses. Such information is collected at the time of meeting potential Presenters for the purpose of considering whether SHA will proceed with the engagement. We may also collect or create other personal information about Presenters during the training or event and after its conclusion, such as participant feedback, dietary or mobility requirements of Presenters, and follow up communications.

## 2.11 Market research findings

(a) SHA may commission market research about subscribers as well as non-subscribers for various purposes, including for useability surveys and feedback. If our survey provider also collects your personal information, that survey provider will make a copy of their privacy policy available to you, and their collection and use of your personal information will be subject to that privacy policy.

(b) SHA only collects and holds market research information in aggregate form and does not connect any of this aggregate information with its personal information records to try and ascertain an individual's responses.

## 2.12 Images and recordings

(a) SHA may collect images (video or photographs) and sound recordings of training sessions and events, which may either be taken by SHA or by a service provider.

(b) At the time of registering for an event, you will be given the option to indicate if you do not want SHA to collect and/or use any images or recordings of you. You may also contact SHA directly to express your preference.

(c) SHA's contact details are provided in section 10.

### 2.13 Applicants, contractors, and consultants

(a) If you are an applicant for a position with us, we will collect your name, contact details, educational and work history, and other information that you provide to us as part of the application process.

(a) If you are a contactor or consultant, we will collect the name, contact details, and position of any individuals with whom we need to communicate in relation to goods or services that you provide.

## Collection of personal information from our website, emails, apps, and social media

### 2.14 Our websites

(a) When you visit our websites or download, access or register to use our websites, (which may also include the use of any of our products, services, or apps), we may collect your personal information such as your name, address, email address, phone number, date of birth, username, password, and other information. We may also collect information automatically, including technical information related to your mobile device, your device's unique identifier, your mobile network information, the type of mobile browser you use and information about the way you use our products, services, or apps.

(b) Depending on the product, service, or app you use, and only after you have agreed to such collection, for example at the time of first signing up for and installing an app, we may also collect information stored on your device, including contact information, location information or other digital content.

(c) When you access our apps including via your mobile device, our service provider collects username details to authenticate access to subscriber-only content. We do not review or use this information for any purpose beyond authentication with our subscription database.

(d) We or our service providers use web analytics to collect a range of information about your interactions with our websites. Web analytics software collects the information using several techniques including cookies (both first- and third-party cookies) and Java Script. We also use web analytics to collect information from the browsers of those who use our websites or participate in SHA social media forums or groups. Please refer to the SHA [Cookie Policy](#) or further information about cookies and how we handle cookie data.

(e) The information we collect using web analytics software includes your IP address, domain name, date and time of visit, the pages visited, and time spent on each page, whether you have visited the site before and what site referred you to the web page. We use this information to evaluate the effectiveness of our websites and the level of interest in particular pages or SHA's campaigns.

(f) We use a variety of technology to enhance your experience, including Google Analytics, behavioural marketing tools to build and score a profile which influences what marketing may be of interest to you, and tools to maintain contact with subscribers, leads and prospects.

(g) Our websites may contain links to other sites. We are not responsible for the privacy practices or policies of those sites and we suggest that you review the privacy policies of those other sites.

## 2.15 Emails

(a) If you send us an email, that address will be recorded automatically by our e-mail messaging system for the purpose of replying to your e-mail. However, if you are a subscriber, we will normally use the e-mail address you provided in your subscription application/renewal, unless you ask us to use a different e-mail address.

## 2.16 Social media

(a) We participate in social media, for example, through our LinkedIn group, Facebook or Twitter. If we think it is relevant to the quality of service that SHA provides or its objectives, we sometimes note the nature of any topic discussed by a particular individual and their name. SHA may then contact the individual in a separate forum to further discuss the topic. In some instances, SHA may keep a note of the discussion, including details about what was



discussed, and any interesting insights provided by the individual, and details about when the discussion occurred.

(b) Social media services also handle your personal information for their own purposes. These sites have their own privacy policies. We are not responsible for the privacy practices or policies of those sites and we suggest that you review their privacy policies.

### **3. Use of personal information**

3.1 We will not use your personal information for any purpose which you would not reasonably expect unless it is consistent with the Privacy Act. If we think that you may not expect us to use your information for a purpose which is directly related to the purpose of our collection of that information, we will ask for consent before we use it for that purpose.

#### **Personal information from subscription training course and event applications**

3.2 We use such personal information to:

(a) manage the subscription of SHA products and subscriber participation in certain programs, such as training forums.

(b) administer and meet subscriber requirements for the service, course event or program.

(c) help us improve a particular service, event, or program.

(d) identify and analyse your activities and interests to better meet subscriber needs and attract new subscribers.

(e) enable us to target marketing communications to you (please refer to section 5 for further information); and

(f) enable SHA to further its mission of improving the use of accurate spatial data to accelerate business decisions.

#### **Research findings**

3.3 We use such information to:

- (a) identify your needs and ensure our products and services meet those needs.
- (b) identify prospective subscribers and provide marketing approaches designed to recruit new subscribers; and
- (c) provide up-to-date information to support lobbying activity and make submissions on issues and proposed laws.

### **Event images and recordings**

3.4 We use sound and image recordings of our events to promote SHA (including if SHA collaborates with a trusted third party), and to enable us to improve our events, and for educational purposes (such as webinars).

3.5 Please refer to section 3.11 for further information about how SHA manages the collection of images and recordings.

### **Data aggregation**

3.6 In some circumstances, we collect your personal information and de-identify it for the purpose of aggregating data. We primarily do this to better understand certain trends among our subscription, to plan and execute marketing campaigns, to improve our products and services, or create new ones. We may also do so for internal reporting purposes.

3.7 We may aggregate data obtained through self-assessment tools made available through our current and future online services. Any access to non-aggregated data is strictly limited to those employees who are providing the services.

3.8 We will not aggregate data for a purpose which you would not reasonably expect unless it is consistent with the Privacy Act. If we have any doubt about whether you would expect us to aggregate your personal information for a certain purpose, we will seek consent from you.

### **Applicants, contractors, and consultants**

3.9 If you are an applicant, we will use your personal information to process your application for a position with us.

3.10 If you are a contractor or consultant, we will use the personal information of your employees that you have provided to us to contact you in relation to any goods or services that you provide to us.

## 4. Communications

4.1 We may send various types of communications to you, depending on your indicated preference.

4.2 Our advertising and marketing material, content, information, and communications (**Marketing Material**) is sent to you if our records indicate that you would like information about our products and services which may be of personal and/or professional benefit to you, whether you are a subscriber or non-subscriber. These products or services may extend beyond those provided by SHA and may include offers from third parties that we or our providers consider may of interest to you.

4.3 Our subscription-related material, content, information, and communications (**Subscription-Related Material**) is sent to subscribers. By signing up for subscription and providing SHA with your contact details as part of that subscription application, you consent to receiving Subscription-Related Material. Subscription-Related Material includes subscription welcome letters, newsletters, or any other communication which does not involve promotion of any products or services, including those of SHA.

4.4 We may send any of these Marketing Materials or Subscription-Related Materials by mail, telephone, email, SMS, or other electronic methods, such as through social media or targeted advertising. If you indicate a preference for a method of communication, we will try to use that method where it is practical for us to do so.

4.5 When you access our websites, we may display customised marketing material to you based on data stored in your cookies. Your opt-out options may be different for this kind of marketing material (please refer to SHA's [Cookie Policy](#) for further information about how we handle cookie data).

4.6 We give you the chance to opt-out of receiving Marketing Material and Subscription-Related Materials in our communications with you, such as forms, letters, or emails, or you

can opt out by contacting us using the details provided in section 10 or by logging-in to your user account.

4.7 Unless you have opted out, we will continue to provide:

(a) Marketing Material and Subscription-Related Material to subscribers for 12 months after they have ceased to be subscribers; and

(b) Marketing Material to non-subscribers for 12 months after their last interaction with us.

## 5. Disclosure of your personal information

5.1 We only disclose your personal information for the purposes outlined in this Policy or for purposes that are directly related to those purposes that you would reasonably expect.

### Events

5.2 We disclose the name, title, organisation, and post nominal of event participants to:

(a) any Presenters under strict conditions to enable them to carry out their role in relation to an event, for example, to organise table lists, or facilitate introductions.

(b) sponsors and potential sponsors to enable them to assess whether to sponsor an event.

(c) providers of special subscriber offer from time to time under strict conditions; and

(d) event attendees in the form of a list showing the names of all the people who have registered to attend the event, unless at the time you registered for that event that you do not want your name included in such a list.

5.3 We also disclose the name, title, organisation, post nominal, and credentials of any Presenters to SHA subscribers and the public generally by way of our website to promote the event.

### Courses

5.4 We disclose the name, title, organisation, and post nominal of course participants to other participants in that same course. This is shown as a list which is displayed on the day of the course showing the names of all the people who have registered to attend the course.

5.5 We also disclose the name, title, organisation, post nominal, and credentials of any Presenters to SHA subscribers, course participants, and the public generally by way of our websites for the purpose of promoting the course.

### **Affiliated partners of SHA**

5.6 We disclose personal information to partners affiliated with SHA, including but not limited to 3<sup>rd</sup> party product providers hosted on our platform. These partners work on behalf of SHA to carry out specific responsibilities which we delegate to them.

5.7 Our affiliated partners are only permitted to use your personal information for the purpose for which they received the personal information, which we specify when we delegate responsibility to them.

5.8 Some of SHA's affiliated partners may be located outside of Australia. Please refer to the 'Overseas Disclosure' section below for further information.

### **Third party contractors and partners**

5.9 We disclose personal information to contracted service providers, including those service providers set out under the privacy headings in our **Terms and Conditions**, who assist us with a number of our functions and services including technology, data processing, contact centre, legal, accounting, applicant verification and assessment, business consulting, auditing, archival, delivery, banking, payments, market research, content production and mailing but only for the purpose of fulfilling those services.

5.10 Service providers may use cookies and other technologies to conduct certain activity, which then allows us to supply our services to you. Please refer to the SHA [Cookie Policy](#) for further information about how we handle cookie data.

### **Other disclosures**

5.11 We may also disclose your personal information to other subscribers of SHA where you have consented to us sharing that information - for example, if a subscriber requests your contact details, we will call or email you to ask for your consent before sharing your details; and

### **Where authorised or required by law**

5.12As authorised by the Privacy Act we disclose personal information in connection with law enforcement activities by enforcement bodies, for example, Australian Securities and Investments Commission investigations or other investigations into suspected fraud or unlawful activity.

5.13 We are required by Part 2C.1 of the *Corporations Act 2001* (**Corporations Act**) to collect and record certain information in our subscriber register and allow an individual to inspect SHA's subscriber register and view current and past subscribers' names and addresses. Inspection is free for subscribers, but a fee may be payable by non-subscribers. We will provide a copy of the register if you make a valid application under the Corporations Act to us and pay the relevant fee. However, the Corporations Act and Chapter 2C of the Corporations Regulations 2001 prohibit the individual from using the information gained to contact, or send material to, subscribers, and from using it for other prescribed purposes and penalties apply for such misuse of such information.

5.14 We may also disclose personal information to Australian and overseas regulatory authorities or other organisations to assist them with business licensing or due diligence purposes. This could include the fact that you are a subscriber of SHA and the nature of your subscription.

### **Overseas disclosure**

5.15 From time to time, we may send your personal information overseas, we take steps that are reasonable in the circumstances to ensure that the host does not breach the Australian Privacy Principles. The steps we take include:

(a) assessing whether the service provider is in a country that has at least equivalent privacy protections to those in Australia.

(b) adding provisions in our contract with the service provider that require them to protect the personal information they hold; and

(c) when choosing a service provider, including in our considerations the privacy law or scheme (if any) that applies in the country in which the service provider operates.

## **6. Security of personal information**

6.1 We regularly assess the risks of misuse, interference, loss, unauthorised access, modification, or disclosure of personal information and ensure that we have adequate measures, including policies, procedures, and technology, to address those risks.

## **7. Retention of personal information**

7.1 We hold subscriber information for a 5 year period post the end of the subscription.

7.2 We hold information relating to your attendance at a course or event for the period of your subscription.

## **8. Access and correction**

8.1 You have a right to ask for access to the personal information we hold about you. Unless there is a lawful reason not to, we will give you access to it and allow you to correct any incorrect information.

8.2 If you are a subscriber, you can correct personal information we hold about you by logging onto your user account, or by contacting us using the contact details below.

8.3 If you are a non-subscriber, you can ask to correct personal information we hold about you by contacting us using the contact details below.

8.4 We may ask you to verify your identity if you ask for access to your personal information, or to correct your personal information, to ensure we don't give information to the wrong person.

8.5 If we don't give you access to your personal information or refuse to correct it, we will tell you why.

## 9. Contact details and concerns

9.1 In the event that you have a question or concerns regarding the way in which we handle your personal information, you should contact our Privacy Officer directly at:

The Privacy Officer

Spatial Hub Analytics

Email: [privacy@spatialhub4D.com](mailto:privacy@spatialhub4D.com)

9.2 We take your privacy concerns seriously. Where you express any concerns that we have interfered with your privacy, we will respond within 48 hours to let you know who will be handling your matter and when you can expect a further response.

9.3 If you are unsatisfied with our response you may complain to the Office of the Australian Information Commissioner. Information about how to make a complaint is available at <https://www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint>

## 10. Changing this policy

10.1 We may amend this Policy from time to time, including in response to legislative changes, and notify you of any amendments through our publications and by posting an updated version on [our website](#). Please let us know if you have any concerns about any changes to this privacy policy.

10.2 Any amendments to this Policy will be effective immediately once it is posted to our websites. Your use of our websites, products or services following such amendments represents that you agree to be.

10.3 Suggestions about improving this Policy are welcomed. Please contact us at [privacy@spatialhub4D.com](mailto:privacy@spatialhub4D.com) should you wish to provide any feedback.

10.4 This Policy was last amended in January 2022