
InLoop Privacy Policy

InLoop is committed to protecting your data and providing you with a safe online experience. This Privacy Policy explains how we may collect, use and disclose your Personal Information when you visit, use or submit information through our Site. By providing Personal Information to us and/or using the Services provided by us, you consent to our data practices, including the collection, use and disclosure of your Personal Information in accordance with this Privacy Policy and any other arrangements that apply between us.

Where there are capitalised terms used in this statement that are not otherwise defined, you can find the definitions in the definitions section below.

1. General terms about this policy

- 1.1 This Privacy Policy applies when you visit, use or submit information through our Site, and governs our data collection, use and disclosure. This Privacy Policy is available in hardcopy on request.
- 1.3 Please **contact us** (through the method set out in clause 10 below and/or on our website) if you have questions about these terms or our privacy practices that are not addressed in this Privacy Policy.

2. Collection of your data

- 2.1 InLoop may collect Personal Information, including the following types of information:
 - e-mail address;
 - name;
 - age;
 - home or work address;
 - organisation name and address;
 - telephone number;
 - password;
 - records of your use of our Sites; and
 - information through customer surveys or any additional information relating to you that you provide us directly through our Sites, or indirectly through your use of our Sites.
- 2.2 There is also information about your use of computer hardware (including hand-held devices) and software that is collected by or on behalf of InLoop. This information can include your IP address, browser type, device type and location, domain names, access times, which pages you viewed, and how you navigated through our Sites (including fields you access or complete in forms and applications). This information is used by us for the operation and quality maintenance of our Sites and related services, and/or to understand general statistics regarding use of our Sites.
- 2.3 The information that we seek to collect about you may vary and may depend on the situation under which you are providing the information. If you do not allow us to collect all of the information we request, we may not be able use your information effectively, including to contact you about particular sales inquiries, evaluate your qualifications for any new employment positions, or to deliver our services effectively or at all where appropriate.
- 2.4 InLoop's collection of data as set out in this clause and Privacy Policy generally may occur directly by us through electronic means (for example when you visit our Sites), or through third party service providers acting on our behalf.
- 2.5 Your information, including Personal Information, may be collected when you:
 - provide your details on our Sites in order for us to contact you;
 - communicate with us through correspondence, chats, email or when you share information with us from other social applications, services or websites; or
 - interact with our Sites, related services, content and/or advertising.
- 2.6 Where links to other websites are provided through our Sites, we encourage you to review the privacy policies of any such websites you choose to link to so that you can understand how those websites collect, use and share your information. InLoop is not responsible for the use, access, storage or treatment of your data (including Personal Information) and the privacy policies or other content on websites or applications outside of our Sites.

3. Use of your Personal Information

3.1 InLoop collects, holds, uses and discloses your Personal Information to operate, deliver and improve our Sites and overall services. Where we have engaged a third party to assist us with our Sites (including organisations who may be located and who may process your data in foreign jurisdictions), we may provide your details to the applicable third party to allow them to perform the services we require, provided that we take reasonable steps to ensure such third party is subject to appropriate confidentiality measures.

3.2 InLoop may, directly or through one of our third-party service providers:

- use your Personal Information to send you direct marketing communications and/or inform you of other products, services or offerings available from InLoop or members of the InLoop Group; and/or
- contact you (including via surveys) to conduct research about your opinion of our Sites, current services offered by the InLoop Group, or of potential new services that may be offered.

These communications from us may take the form of emails, SMS, mail or other forms of communication, in accordance with applicable laws. You may opt-out of receiving marketing materials from us by contacting us at contact@inloop.com.au, or by using the opt-out facilities provided (e.g. an unsubscribe link).

4. Disclosure of your Personal Information and other data

4.1 InLoop may disclose Personal Information or other information about or provided by you for the following reasons:

- without notice and if authorised, permitted or required by law or a regulator, including in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on InLoop or the relevant site; (b) protect and defend the rights or property of InLoop; and/or (c) act under exigent circumstances to protect the personal safety of users of InLoop, or the public;
- to members of the InLoop Group, to, among other things, manage risk, help detect and prevent illegal acts, and help InLoop manage communications to you;
- to third party suppliers and service providers who perform services and functions at InLoop's direction and/or on InLoop's behalf in connection with providing any communications or related services to you;
- to third parties for our internal business purposes or as permitted or required by law, including to support our audit, compliance and corporate governance functions;
- to third parties who may collect certain use statistics from your devices or from our Sites in accordance with clause 2.2 above;
- to anyone to whom our assets or businesses (or any part of them) are transferred;
- to third parties where you have expressly consented to the disclosure or your consent may be reasonably inferred from the circumstances; and
- where we are otherwise permitted to disclose the information under the Privacy Act.

4.2 InLoop may collect, use and disclose information associated with your use of the Service provided that the information is de-identified, aggregated or otherwise made anonymous, and use and disclose that de-identified, aggregated or otherwise anonymous information for any purpose with third parties provided that, in so doing, InLoop does not reveal any Personal Information.

5. Access to and correction of your Personal Information

5.1 InLoop seeks to ensure that the information it holds about you is accurate, up to date, complete and relevant. If you learn that Personal Information InLoop holds about you is inaccurate, not up to date, incomplete, irrelevant or misleading, you should contact InLoop so that your information can be promptly corrected. Our contact details are listed below or on our website.

5.2 If you wish to see what information InLoop holds about you, you can contact us, or where possible check your account on or through our Sites. This will contain almost all the information that InLoop maintains about you. If you think we may have additional Personal Information, you can ask to access that information. Sometimes, we

may not be able to provide you with access to all of your Personal Information and, where this is the case, we will tell you why. We may also need to verify your identity when you request your Personal Information.

6. Use of Cookies

- 6.1 InLoop uses "cookies" as part of the normal operation of our Sites, and the Sites may not work appropriately if your browser has cookies disabled. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you. Where a cookie collects any Personal Information, for example where the cookie is linked to your account, we will handle this in the same way that we handle all other Personal Information as described in this Privacy Policy.

7. Security of your Personal Information

- 7.1 InLoop maintains security measures designed to provide reasonable protection for your Personal Information against loss, unauthorised access, misuse or disclosure. These security measures include reasonable access controls and data encryption.
- 7.2 While there is no guarantee that Personal Information transmitted to other websites is fully secure, InLoop will encrypt Personal Information in transit through the use of industry standard encryption methods.

8. Data Breach Notifications

- 8.1 InLoop will comply with the notifiable data breaches scheme under the Privacy Act (NDB Scheme). The NDB Scheme requires organisations and agencies with obligations under the Privacy Act to notify the Office of the Australian Information Commissioner and impacted individuals about 'eligible data breaches'. A data breach is "eligible" if it is likely to result in serious harm to any of the individuals to whom the information relates.
- 8.2 If there has been an eligible data breach that impacts Personal Information provided by you, InLoop will notify you (or the applicable individual(s) if relevant) as soon as reasonably possible, and where relevant, keep in contact with you about the nature of the breach, the steps we are taking and what can be done to reduce the impacts to the applicable individuals privacy.

9. Changes to this policy

InLoop may occasionally update this Privacy Policy. InLoop encourages you to periodically check our Sites and review this Privacy Policy to be informed of any changes to how InLoop is protecting your information. An up-to-date version of this Privacy Policy may be found through our Sites.

10. How to contact us

InLoop welcomes your comments regarding this Privacy Policy. You may contact us at contact@inloop.com.au, including for the following reasons: if you believe that InLoop has not adhered to this Privacy Policy or you have a related complaint; if you seek further information about our privacy practices; or if you seek to access or correct your Personal Information held with us. We will use commercially reasonable efforts to respond to you promptly. We will also let you know if we need any further information.

Where you have a complaint and have contacted us as set out above, we will use commercially reasonable efforts to promptly determine and remedy the applicable issue. Where you believe we have failed to resolve a complaint satisfactorily in accordance with this Privacy Policy, we will provide you with information about further steps you can take.

11. Definitions

InLoop means InLoop Claims Pty Ltd (ABN 28 606 978 796);

InLoop Group is a reference to any Related Body Corporate of InLoop (as that term is defined in the Australian Corporations Act).

Personal Information includes any information or opinion, about an identified individual or an individual who can be reasonably identified from their information. The information or opinion will still be Personal Information whether it is true or not and regardless of whether we have kept a record of it;

Privacy Act means the Australian *Privacy Act 1988* (Cth);

Sites means the websites, mobile apps, official social media platforms or other online properties through which InLoop provides information about the InLoop Group members and services and/or information about how to contact InLoop;

We, us or our means InLoop.