

# Synergisation Privacy Policy

Information related to how Synergisation collects, stores, uses, share, and disclose data.

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Synergisation values your trust and we take our obligations to handle all information and data responsibly, very seriously. Synergisation's Privacy Policy explains how we collect, use, store, share, and protect your personal information when you interact with our website, services, content, or communication channels. We follow the Privacy Act 1988, the Australian Privacy Principles, Office of the Australian Information Commissioner (OAIC), the legal jurisdiction of New South Wales, Australia, and other applicable international privacy laws.

This Policy applies to Synergisation Pty Limited and all services we provide. We believe your privacy should be simple to understand and easy to control. We collect only what we need to provide our services, improve our website, support clients, and communicate with you.

Further information is available below in regard to specific privacy topics and practices, and please contact us if you have any further questions. Download a copy of this Privacy Policy (PDF)

## What Is Personal Data at Synergisation?

At Synergisation, we believe strongly in fundamental privacy rights, and that those fundamental rights should not change depending on where you live in the world. That's why we treat any data that relates to an identified or identifiable individual or that is linked or linkable to them by Synergisation as "personal data," no matter where the individual lives. This means that data that directly identifies you, such as your name, is personal data, and also data that does not directly identify you, but that can reasonably be used to identify you, is personal data. Aggregated data is considered non-personal data for the purposes of this Synergisation Privacy Policy.

This Privacy Policy covers how Synergisation or a Synergisation-affiliated company (collectively, "Synergisation") handles personal data whether you interact with us on our websites, through Synergisation apps, or in person (including by phone or when visiting a Synergisation premises). Synergisation's Privacy Policy does not apply to how third parties define personal data or how they use it. We encourage you to read their privacy policies and know your privacy rights before interacting with them.

## Your Privacy Rights at Synergisation

At Synergisation, we respect your ability to know, access, correct, transfer, restrict the processing of, and delete your personal data. We have provided these rights to our global customer base and if you choose to exercise these privacy rights, you have the right not to be treated in a discriminatory way nor to receive a lesser degree of service from Synergisation. Where you are requested to consent to the processing of your personal data by Synergisation, you have the right to withdraw your consent at any time. To exercise your privacy rights and choices, including where a third-party service provider is acting on Synergisation's behalf, contact Synergisation directly. To help protect the security of your personal data, you can make a request at synergisation.com/legal/privacy/contact. You also have the right to lodge a complaint with the applicable regulator.

There may be situations where we cannot grant your request, for example, if you ask us to delete your transaction data and Synergisation is legally obligated to keep a record of that transaction to comply with law. We may also decline to grant a request where doing so would undermine our legitimate use of data for anti-fraud and security purposes, such as when you request deletion of an account that is being investigated for security concerns. Other reasons your privacy request may be denied are if it jeopardises the privacy of others, is frivolous or vexatious, or would be extremely impractical or unreasonable.

If you cannot access Synergisation's Data and Privacy page, or for more information on exercising your rights you or your authorised agent can make a request at synergisation.com/legal/privacy/contact or by calling 1300-140-740.

## Personal Data Synergisation Collects from You

At Synergisation, we believe that you can have great products and services, and great privacy. This means that we aim to collect only the personal data that we need. The personal data Synergisation collects depends on how you interact with Synergisation.

When you interact with Synergisation, purchase and/or activate a product or service, download software, download another product or service, register for a workshop or class with Synergisation, connect to our services, contact us (including by social media), participate in an online survey, or otherwise interact with Synergisation, we may collect a variety of information, including:

- Account Information.** Your Synergisation Account and related account details, including email address, devices registered, account status, and age
- Device Information.** Data from which your device could be identified, such as device serial number, or about your device, such as browser type
- Contact Information.** Data such as name, email address, physical address, phone number, or other contact information
- Payment Information.** Data about your billing address and method of payment, such as bank details, credit, debit, or other payment card information
- Transaction Information.** Data about purchases of Synergisation products and services or transactions facilitated by Synergisation, including purchases on Synergisation platforms
- Usage Prevention Information.** Data used to help identify and prevent fraud, including a device trust score

**Fraud Data.** Data about your activity on and use of our offerings, such as app launches within our services, including browsing history, search history, product interaction, crash data, performance and other diagnostic data; and other usage data

**Location Information.** Precise location only to support services or where you agree for region-specific services, and coarse location

**Other Information You Provide to Us.** Details such as the content of your communications with Synergisation, including interactions with customer support and contacts through social media channels. You are not required to provide the personal data that we have requested. However, if you choose not to do so, in many cases we will not be able to provide you with our products or services or respond to requests you may have.

Specifically, Synergisation may collect the following types of information:

### Information you provide directly

- Name
- Email address
- Phone number
- Postal or billing address
- Business information provided for service delivery
- Messages and details provided through website forms, social media, or direct communication
- Payment or billing details when required for paid services (processed through secure third parties)

### Information collected automatically

- Website analytics including device information, browser details, IP address, pages visited, and traffic patterns
- Interaction data such as clicks, scrolls, time on page, and referring sources
- Pixel and advertising tracking data from tools such as Google, Meta, and HubSpot

### Information from third parties

- Platforms you connect through, including HubSpot forms, Google Analytics, Meta Ads, or payment processors
- Public business information relevant to service delivery.

## Personal Data Synergisation Receives from Other Sources

Synergisation may receive personal data about you from other individuals, from businesses or third parties acting at your direction, from our partners who work with us to provide our products and services and assist us in security and fraud prevention, and from other lawful sources.

**Individuals.** Synergisation may collect data about you from other individuals, for example, if that individual has sent you a product or service, invited you to participate in a Synergisation service or forum, or shared content with you.

**At Your Direction.** You may direct other individuals or third parties to share data with Synergisation. For example, you may information for a loyalty program or to share information about your participation so that you can earn rewards for Synergisation services if applicable.

**Synergisation Partners.** We may also validate the information you provide, for example, when creating an Synergisation account, with a third party for security, and for fraud-prevention purposes. For research and development purposes, we may use datasets such as those that contain images, voices, or other data that could be associated with an identifiable person. When acquiring such datasets, we do so in accordance with applicable law, including law in the jurisdiction in which the dataset is hosted. When using such datasets for research and development, we do not attempt to re-identify individuals who may appear therein.

## Synergisation's Use of Personal Data

Synergisation uses personal data to power our services, to process your transactions, to communicate with you, for security and fraud prevention, and to comply with law. We may also use personal data for other purposes with your consent.

**Synergisation uses your personal data only when we have a valid legal basis to do so.** Depending on the circumstance, Synergisation may rely on your consent or the fact that your processing is necessary to fulfil a contract with you, protect your vital interests or those of other persons, or to comply with law. We may also process your personal data where we believe it is in our or others' legitimate interests, taking into consideration your interests, rights, and expectations. More information is available in the product-specific information embedded in our products and features as described above. If you have questions about the legal basis, you can contact the Data Protection Officer at synergisation.com/legal/privacy/contact.

**Power Our Services.** Synergisation collects personal data necessary to power our services, which may include personal data collected to improve our offerings, for internal purposes such as auditing or data analysis, or for troubleshooting.

**Process Your Transactions.** To process transactions, Synergisation must collect data such as your name, purchase, and payment information.

**Communicate with You.** To respond to communications, reach out to you about your transactions or account, market our products and services, provide other relevant information, or request information or feedback. From time to time, we may use your personal data to send important notices, such as communications about purchases and changes to our terms, conditions, and policies. Because this information is important to your interaction with Synergisation, you may not opt out of receiving these important notices.

**Security and Fraud Prevention.** To protect individuals, employees, and Synergisation and for loss prevention and to prevent fraud, including to protect individuals, employees, and Synergisation for the benefit of all our users, and prescreening or scanning uploaded content for potentially illegal content.

**Personal Data Used for Personalisation.** If you choose to personalise your services or communications where such options are available, Synergisation will use information that we collect so that we can offer you those personalised services or communications. You can learn more about how relevant services use information to personalise your experience by reviewing the privacy information presented when you first use a service that asks to use your personal data.

**Comply with Law.** To comply with applicable law — for example, to satisfy tax or reporting obligations, or to comply with a lawful governmental request, Synergisation does not use algorithms or profiling to make any decision that would significantly affect you without the opportunity for human review. Synergisation also does not use or disclose sensitive personal data for any purposes that would require a user to exercise a right to limit processing according to New South Wales law. Synergisation retains personal data only for as long as necessary to fulfil the purposes for which it was collected, including as described in this Privacy Policy or in our service-specific privacy notices, or as required by law. We will retain your personal data for the period necessary to fulfil the purposes outlined in this Privacy Policy and our service-specific privacy notices. When assessing retention periods, we first carefully examine whether it is necessary to retain the personal data collected and, if retention is required, work to retain the personal data for the shortest possible period permissible under law.

### We may use your information to:

- Provide and deliver our digital services and consulting
- Respond to enquiries and support requests
- Process payments through secure external providers
- Improve website performance and user experience
- Communicate updates, educational content, or marketing messages if you opt in
- Analyse service performance and business operations
- Comply with legal obligations under Australian law

We will only use your personal information for the purposes described above or for purposes you would reasonably expect.

## Synergisation's Sharing of Personal Data

Synergisation may share personal data with Synergisation-affiliated companies, service providers who act on our behalf, our partners, developers, and publishers, or others at your direction. Further, Synergisation does not share personal data with third parties for their own marketing purposes.

**Service Providers.** Synergisation may engage third parties to act as our service providers and perform certain tasks on our behalf, such as processing or storing data, including personal data, in connection with your use of our services and delivering products to customers. Synergisation service providers are obligated to handle personal data consistent with this Privacy Policy and according to our instructions. They cannot use the personal data we share for their own purposes and must delete or return the personal data once they've fulfilled our request.

**Partners.** At times, Synergisation may partner with third parties to provide services or other offerings. Synergisation requires its partners to protect your personal data.

**Others.** Synergisation may share personal data with others at your direction or with your consent, such as when we share information with your carrier to activate your account. We may also disclose information about you if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate. We may also disclose information about you where there is a lawful basis for doing so, if we determine that disclosure is reasonably necessary to enforce our terms and conditions or to protect our operations or users, or in the event of a reorganisation, merger, or sale.

## Protection of Personal Data at Synergisation

At Synergisation, we believe that great privacy rests on great security. We use administrative, technical, and physical safeguards to protect your personal data, taking into account the nature of the personal data and the processing, and the threats posed. We are constantly working to improve on these safeguards to help keep your personal data secure.

We use administrative, technical, and physical safeguards to protect your information from loss, misuse, unauthorised access, or disclosure.

### Examples include:

- Secure cloud storage
- Password protection and access controls
- Encrypted communication channels where supported
- Regular review of security practices
- Limiting access to authorised personnel and contractors only

No method of online transmission is completely secure, but we take reasonable steps to protect your data in line with Australian standards.

You have options for how your personal information is used.

### You can:

- Opt out of marketing emails at any time
- Disable cookies in your browser
- Adjust ad tracking preferences on digital platforms
- Request access to the information we hold about you
- Request correction of inaccurate information
- Request deletion where legally permitted
- Withdraw consent where consent is the basis for processing

To exercise any of these rights, contact us at privacy@synergisation.com.

## Minors and Personal Data

Synergisation understands the importance of safeguarding the personal data of minors, which we consider to be an individual under the age of 13 or the equivalent age as specified by law in your jurisdiction. That is why Synergisation has implemented additional processes and protections to help protect minor's personal data safe.

**Parents.** To act on behalf of a minor or create a contract for a minor, parents must provide Synergisation with a verifiable parental consent. If we learn that a child's personal data was collected without appropriate authorisation, it will be deleted as soon as possible. If your belief information has not target or provide services to children. We do not knowingly collect personal information from anyone under 13 years old. If you believe information has been collected from a minor, contact us and we will remove it promptly.

## Cookies and Other Technologies

Synergisation's websites, online services, interactive applications, and advertisements may use "cookies" and other technologies such as web beacons. These technologies help us to better understand user behaviour including for security and fraud prevention purposes, tell us which parts of our websites people have visited, and facilitate and measure the effectiveness of advertisements and web searches.

**Communications Cookies.** These cookies are used to enable network traffic to and from Synergisation's systems, including by helping us detect any errors.

**Strictly Necessary Cookies.** These cookies are set as required to provide a specific feature or service that you have accessed or requested. For example, they allow us to display our websites in the proper format and language, to authenticate and verify your transactions, and to preserve the contents of your cart when shopping or purchasing online at Synergisation.com.

**Other Cookies.** These cookies are used to understand how visitors interact with our websites and online services, including by helping us to assess the effectiveness of advertisements and web searches. Synergisation also uses these cookies to remember choices you make while browsing, so we can provide you with a customised experience.

If you prefer that Synergisation not use cookies, we provide you with the means to disable their use. If you want to disable cookies and you're using the Safari web browser, choose "Block all cookies" in Safari's privacy settings. If you are using a different browser, check with your provider to find out how to disable cookies. Certain features of the Synergisation website may not be available if all cookies are disabled.

In addition to cookies, Synergisation uses other technologies that help us achieve similar objectives.

In some email messages Synergisation sends to you, we may provide a "click-through URL," that links you to content on the Synergisation website. When you click one of these URLs, they pass through a separate server before arriving at the destination page on our website. We track this click-through to help us determine interest in particular topics and measure whether we are communicating with you effectively. If you prefer not to be tracked in this way, you should not click graphic or text links in email messages.

Synergisation generally treats data we collect using these cookies and similar technologies as non-personal data. However, to the extent that Internet Protocol (IP) addresses or similar identifiers are considered personal data by local law, we also treat these identifiers as personal data in those regions. In addition, Synergisation sometimes combines non-personal data collected from these technologies with other personal data Synergisation holds. When we combine data in this way, we treat the combined data as personal data for purposes of this Privacy Policy.

Synergisation may use cookies, tracking pixels, and similar technologies to:

- Understand website performance
- Analyse visitor behaviour
- Improve user experience
- Deliver personalised or relevant content
- Support advertising campaigns where applicable

You can disable cookies in your browser settings. Some features of our website may not work correctly without cookies.

## Transfer of Personal Data Between Countries

Synergisation products and offerings connect you to the world. To make that possible, your personal data may be transferred to or accessed by entities around the world, including Synergisation-affiliated companies, to perform processing activities such as those described in this Privacy Policy in connection with your use of our products and services. Synergisation complies with laws on the transfer of personal data between countries to help ensure your data is protected, wherever it may be. The Synergisation entity that controls your personal data may differ depending on where you live.

Personal data collected by Synergisation or an Synergisation-affiliated company worldwide is generally stored by Synergisation Pty Limited in Australia. Regardless of where your personal data is stored, Synergisation maintains the same high level of protection and safeguarding measures.

Because we use global service providers and cloud technology, your information may be stored or processed outside Australia. All transfers follow legal requirements and industry standards to keep your data protected.

If you are located outside Australia, your information may be transferred to Australia for processing.

If you are in the European Union, United Kingdom, or other regions with specific privacy laws, we apply practices designed to meet those requirements when applicable.

We do not sell your personal information.

We may share information with:

- Service providers such as HubSpot, Google, Meta, Stripe, and similar platforms
- Contractors or consultants who assist us in delivering services
- Cloud hosting providers
- Payment processors
- Legal or regulatory authorities where required by law

These third parties may store or process data outside Australia. Many use servers located in the United States, Europe, or Singapore. We ensure that any overseas disclosures follow the Australian Privacy Principles.

## Our Commitment to Your Privacy

To make sure your personal data and information is secure, we communicate our privacy policy regularly to ensure accuracy and compliance with employees and strictly enforce privacy safeguards within the company. We review this Privacy Policy regularly to address accuracy and compliance with privacy laws.

If we make significant changes, we will update the date at the top of this page and may post a notice on our website.

## Privacy Questions

If you have questions about Synergisation's Privacy Policy or privacy practices including where a third-party service provider is acting on our behalf, or you would like to contact our Data Protection Officer, you can contact us at synergisation.com/legal/privacy/contact or call 1300-140-740. You can also ask us questions about how to submit a privacy complaint and we will endeavour to help.

Synergisation takes your privacy questions seriously. A dedicated team reviews your inquiry to determine how best to respond to your question or concern, including those inquiries received in response to an access or download request. In most cases, all substantive contacts receive a response within seven days. In other cases, we may require additional information or let you know that we need more time to respond.

Where your complaint indicates an improvement could be made in our handling of privacy issues, we will take steps to make such an update at the next reasonable opportunity. In the event that a privacy issue has resulted in a negative impact on you or another person, we will take steps to address that with you or that other person.

You may at any time, including if you are not satisfied with Synergisation's response, refer your complaint to the applicable regulator. If you ask us, we will endeavour to provide you with information about relevant complaint avenues which may be applicable to your circumstances.

When there is a material change to this Privacy Policy, we will post a notice on this website at least a week in advance of doing so and contact you directly about the change if we have your data on file.

## Additional Australian Privacy Information

The following information is provided to ensure our Privacy Policy complies with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs).

### How to Make a Privacy Complaint

If you have a question, concern, or complaint about how your personal information has been handled, please contact us first. We will acknowledge your complaint, investigate the issue, and provide a written response within a reasonable timeframe, usually within thirty days.

Email: privacy@synergisation.com

Postal: Synergisation Pty Limited  
PO Box 1075, Banora Point  
NSW 2486 Australia

Escalating a Complaint

If you are not satisfied with our response or the way we handled your complaint, you may contact the Office of the Australian Information Commissioner (OAIC).

Website: www.oaic.gov.au

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Unsolicited Personal Information

If we receive personal information that we did not request, we will decide whether we are permitted to keep it under the Australian Privacy Principles. If we are not permitted to retain it, we will take reasonable steps to destroy or de-identify the information as soon as practicable, provided it is lawful and reasonable to do so.

**Cross-Border Disclosure of Personal Information**

Some of the third party services and tools we use may store or process personal information on servers located outside Australia. These locations may include the United States, Europe, or other regions where our service providers operate.

When we disclose personal information to a overseas recipient, we take reasonable steps to ensure that the recipient complies with the Australian Privacy Principles or is otherwise subject to comparable privacy protections.

By using our website or services, you acknowledge that your information may be transferred or stored overseas as part of regular business operations.

### Sensitive Information

Sensitive information includes details about an individual's:

- racial or ethnic origin
- political opinions
- religious or philosophical beliefs
- sexual orientation
- health information
- biometric or genetic data
- membership of professional or trade associations
- criminal record

Synergisation does not generally collect sensitive information. If we ever need to collect sensitive information, we will only do so with your consent or where required or authorised by law.