

# Ikara Privacy Policy

**Ikara Group Ptd Ltd (ABN: 93605644031)** is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The APPs govern the way in which we collect, hold, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Federal Privacy Commissioner at [www.privacy.gov.au](http://www.privacy.gov.au).

# What is Personal Information and why do we collect it?

Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect include: names, addresses, email addresses, user profiles, phone and facsimile numbers.

This Personal Information is obtained in many ways including interviews, correspondence, by telephone and facsimile, by email, via our website [www.ikara.global](http://www.ikara.global), from your website, from media and publications, from other publicly available sources, from cookies and from third parties. We don't guarantee website links or policy of authorised third parties.

We collect your Personal Information for the primary purpose of providing our services to you, providing information to our clients and marketing. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

## Information you provide to us

Ikara collect the following information:

**Account and Profile Information:** We collect information about you and your company as you register for an account, create or modify your profile, use, access, or interact with Ikara Echelon application (including but not limited to when you upload, download, or share Content). Information we collect includes

- Contact information such as name, email address, mailing address, and phone number
- Profile information such as a username, and job title
- Preferences information such as notification and marketing preferences

You may provide this information directly when you enter it in Ikara Echelon.

In some cases, another user (such as a system administrator) may create an account on your behalf and may provide your information, including Personal Information. We collect Information under the direction of our customers and often have no direct relationship with the

individuals whose personal data we process. If you are an employee of one of our customers and would no longer like us to process your information, please contact your employer. If you are providing information (including Personal Information) about someone else, you must have the authority to act for them and to consent to the collection and use of their Personal Information as described in this Privacy Policy.

**Content:** We collect and store Content that you create, input, submit, post, upload, transmit, store or display in the process of using our SaaS Products or Websites. Such Content includes any Personal Information or other sensitive information that you choose to include ("incidentally-collected Personal Information").

## Information we collect from your use of Ikara Echelon

**Web Logs:** We gather certain information and store it in log files when you interact with our Websites and SaaS Products. This information includes internet protocol (IP) addresses as well as browser type, URLs of referring/exit pages, date/time stamp, operating system, internet service provider, information you search for, language and locale preferences, identification numbers associated with your Devices, your mobile carrier and system configuration information. In the case of our SaaS Product, the URLs you accessed (and therefore included in our log files) include usernames as well as elements of content as necessary for the SaaS Product to perform the requested operations. Occasionally, we connect Personal Information to information gathered in our log files as necessary to improve Ikara Echelon for individual customers. In such a case, we would treat the combined Information in accordance with this privacy policy.

**Analytics Information Derived from Content.** Analytics information also consists of data we collect as a result of running queries against Content across our user base for the purposes of generating Usage Data. "Usage Data" is aggregated data about a group or category of services, features or users that does not contain Personal Information.

**Analytics Information from Website and SaaS Products:** We collect analytics information when you use our Website and SaaS Products to help us improve our products and services. In the SaaS Products, this analytics information consists of the feature and function of the Ikara Echelon being used, the associated license identifier (SEN) and domain name, the username and IP address of the individual who is using the feature or function (which will include Personal Information if the Personal Information was incorporated into the username), the sizes and original filenames of attachments, and additional information required to detail the operation of the function and which parts of the Ikara Echelon are being affected.

The analytics information we collect includes elements of Content related to the function the user is performing. As such, the analytics information we collect may include Personal Information or sensitive business information that the user has included in Content that the user chose to upload, submit, post, create, transmit, store or display in our Ikara Echelon.

**Cookies and Other Tracking Technologies:** Ikara and our third-party partners, such as our advertising and analytics partners, use various technologies to collect information, such as cookies and web beacons. Cookies are small data files stored on your hard drive or in device memory. We use cookies to improve and customize Ikara Services and your experience; to allow you to access and use the Websites or SaaS Products without re-entering your username or password; and to count visits and understand which areas and features of the Websites and SaaS Products are most popular. You can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from websites you visit. If you do not accept cookies, however, you may not be able to use all aspects of our Websites or SaaS Products. Ikara and our third-party partners also collect information using web beacons (also known as "tracking pixels"). Web beacons are electronic images that may be used in our Websites or SaaS Products or in emails that help us to deliver cookies, count visits, understand usage and campaign effectiveness and determine whether an email has been opened and acted upon.

Ikara and our third-party partners also use JavaScript, e-tags, "flash cookies", and HTML5 local storage to collect information about your online activities over time and across different websites or online services. Many browsers include their own management tools for removing HTML5 local storage objects. To manage "flash cookies" please click [here](#).

You may be able to opt out of receiving personalized advertisements as described below under "Your Choices."

## Information we collect from third parties

**Information from third party services:** We also obtain information from third parties and combine that with Information we collect through Ikara Echelon. For example, we may have access to certain information from a third-party monitoring system or authentication service if you log into Ikara Echelon through the service or otherwise provide us with access to Information from the service. Any access that we may have to such Information from a third-party monitoring or authentication service is in accordance with the authorization procedures determined by that service. By authorizing us to connect with a third party service, you authorize us to access and store your name, email address(es), current city, and other

information that the third party service makes available to us, and to use and disclose it in accordance with this Privacy Policy.

## **How do we collect personal information?**

We collect personal information directly from you unless it is unreasonable or impracticable to do so. We may collect your personal information in the following ways:

- from you directly when you provide your details to us
- from you indirectly through emails, forms, face-to-face meetings, interviews, registration and attendance at seminars, business cards and telephone conversations and through use of the services and facilities available through [www.ikara.global](http://www.ikara.global), including receiving subscriptions, events, workshops, seminars, blogs and other social media
- when you purchase our solutions and services.
- when we respond to your inquiries and requests.
- during conversations or email exchanges between you and our representatives.
- when we obtain feedback from you about our solutions and services.
- when we conduct our administrative and business functions.
- when we market our solutions and services to you; and
- through your access and use of our website.

## **What purposes do we collect, hold, use and disclose personal information?**

We collect, hold, use and disclose personal information for the following purposes:

- to send communications
- to manage and maintain our business relationships
- to respond to inquiries and requests
- to improve the services and solutions we provide
- to inform you about our services and solutions
- to obtain feedback from you on our services and solutions
- to provide you with a more personalised experience when they interact with us

- to conduct administrative and business functions
- to provide our services and solutions
- to update our records and keep contact details up to date
- to enable you to subscribe to our website, newsletters and mailing lists and to register for Ikara events, workshops and seminars
- to assess the performance of our website and to improve its operation
- to process and respond to privacy complaints; and
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country
- send transactional messages, including responding to your comments, questions, and requests; providing customer service and support; and sending you technical notices, updates, security alerts, and support and administrative messages
- monitor and analyze trends, usage, and activities in connection with Ikara Echelon and for marketing or advertising purposes
- enable you to access and use Ikara Echelon, including uploading, and downloading content

We will not share, sell, rent or disclose your personal information other than as described in this privacy policy

## Sensitive Information

Ikara does not require that you supply any sensitive information to us, unless it is essential for the purpose of conducting business. This type of information will not be collected without your consent.

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law

## Disclosure of Personal Information

Ikara may disclose your personal information to our employees and related bodies corporate for the purposes set out in this policy.

We may combine or share any information that we collect from you with information collected by any of our related bodies corporate.

We may also disclose your personal information to:

- contractors, suppliers and other third parties with whom we have a commercial relationship for business, marketing, and related purposes; and
- any organisation for any authorised purpose with your express consent

Except as set out above, Ikara Group will only disclose personal information if this is required by law or a court/tribunal order or otherwise permitted under the Privacy Act.

### Do we disclose personal information to anyone outside Australia?

Ikara may disclose your personal information to the following overseas recipients:

- other companies or individuals who assist us in providing solutions and services or who perform functions on our behalf (such as third party service providers), including those located in the USA, United Kingdom, Singapore and other countries where we are engaged in business or related activities with you or your company or organisation;
- regulatory authorities
- anyone else to whom you authorise us to disclose it; and
- anyone else where authorised by law

We will take steps to contractually ensure that overseas recipients of your personal information provide a level of protection for your personal information which is equivalent to the APPs.

### Security & Storage of Personal Information

Ikara store personal information to ensure that we can manage and maintain communications with organisations with whom we do business. Contact may be verbal, electronic or written.

We will only store your personal information if it is relevant to your organisation conducting business with us.



We hold personal information in either paper-based records in secure access-controlled premises or in electronic form in databases and email files.

We host data with hosting service providers in numerous countries including the United States and Australia. The servers on which Personal Information is stored are kept in a controlled environments which require logins and passwords. Ikara's personnel and contractors are also contractually bound by confidentiality obligations. We take all reasonable precautions to ensure that personal information is protected from misuse, interference, loss, unauthorised access, modification or disclosure using a combination of physical, administrative and technical safeguards. No security system is impenetrable and due to the inherently insecure nature of the Internet, we cannot guarantee that information, during transmission through the Internet or while stored on our systems or otherwise in our care, will be absolutely safe from intrusion by others, such as hackers. In addition, we cannot guarantee that any incidentally-collected Personal Information you choose to store in Websites or SaaS Products are maintained at levels of protection to meet specific needs or obligations you may have relating to that information.

Where Downloadable Products are used, responsibility of securing access to the data you store in the Downloadable Products rests with you and not Ikara. We strongly recommend that administrators of Downloadable Products configure SSL to prevent interception of data transmitted over networks and to restrict access to the databases and other storage used to hold data.

If your personal information is no longer needed, we will take reasonable steps to either delete it from our systems or de-identify it, except where Ikara Group is required by law or a court/tribunal order to retain the information.

In order to protect your Personal Information, we may require identification from you before releasing the requested information.

## **Direct marketing**

We may send you direct marketing communications and information about our services and solutions that we consider may be of interest to you.

We may send communications in various forms, including mail, SMS, fax and email, in accordance with applicable laws, such as the Spam Act 2003 (Cth). You consent to us sending you those communications by any of those methods. If you indicate a preference for a method of communication, we will use reasonable endeavours to use that method whenever practical to do so.

If you do not wish to receive electronic communications from us, you may opt-out of receiving them by contacting us using the contact details set out at the end of this privacy policy or by using the opt-out mechanisms provided in those communications. We will then remove your name from our mailing list.

We do not provide your personal information to other organisations for the purposes of direct marketing.

## **Access & Maintaining your Personal Information**

We will take all reasonable steps to ensure that the personal information we hold about you is accurate, up to date and complete.

You may request access at any time to personal information that we hold about you and we will give you access in the manner that you request where it is reasonable and practicable to do so, except where we deny access as permitted by the Privacy Act.

For example, we may need to refuse access if granting access would interfere with the privacy of others, is unlawful or would result in a breach of confidentiality.

You may also request that we correct your personal information when it is inaccurate, incomplete or out of date.

If you wish to access or correct your personal information, please send a written request to our Privacy Officer using the contact details set out below. Our Privacy Officer will respond to your request within 30 days after you make the request.

If we deny your request for access to or correction of your personal information, we will provide you with written reasons for refusing your request and the mechanisms available to you to complain about our refusal.

## Policy Updates

If you have any questions about privacy related issues or wish to complain about a potential breach of the Australian Privacy Principles or the handling of your personal information by us, please contact our Privacy Officer, we may ask you to lodge your complaint in writing. Any complaint will be investigated by the Privacy Officer and you will be notified of the making of a decision in relation to your complaint as soon as is practicable after it has been made, usually within 30 days.

This privacy policy was last updated on 24<sup>th</sup> June 2020.

### Privacy Policy Complaints and Enquiries

If you have any queries or complaints about our Privacy Policy, please contact us at:

Email: [info@ikara.global](mailto:info@ikara.global) Phone: 1300 4 IKARA