

# 1. PRIVACY POLICY

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definiti is committed to protecting your privacy and facilitating a safe online experience. This Privacy Policy applies to all of the products, services and websites offered by definiti or its subsidiaries or affiliated companies. Sometimes, we may post product specific privacy notices or materials to explain our services and products in more detail. If you have any questions about this Privacy Policy, please feel free to contact us through our website.

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## 1.1 Advertising Cookies and Opt-Out

When you are accessing the internet through a web browser, we may use cookies from Facebook, Google (and other advertisers) to improve your online experience.

Anyone may opt-out of the Google cookie at any time by going to your Google Ad Settings. You may also opt-out of the Facebook cookie at any time by going to your Facebook Ad Settings.

## 1.2 Information We Collect and How We Use It

We may collect the following types of information:

- Information you provide - When you sign up with or make a purchase from definiti we ask you for personal information. We may combine the information you submit with information from other definiti services or third parties in order to provide you with a better experience and to improve the quality of our services. This won't occur without your consent unless necessary for site security. This data is retained for as long as you have an active account with definiti
- Cookies - When you visit definiti's website, we send one or more cookies to your device. We use cookies to improve the quality of our service, including for storing user preferences, improving search results and ad selection, and tracking user trends, such as how people search. definiti also uses cookies in its advertising services to help advertisers and publishers serve and manage ads across the web and on definiti's services.
- Log information - When you access the services of definiti via browser, application, or other clients, our servers automatically record certain information. These server logs may include information such as your web request, your interaction with a service, Internet Protocol address, browser type, browser language, the date and time of your request and one or more cookies that may uniquely identify your browser or your account.

- Traffic information - When you access the services of definiti via browser, application, or other, we record certain information using our traffic analysis tool, Google Analytics. This information is stored in an anonymised manner but does include data such as your web request, your interaction with a service, Internet Protocol address, browser type, browser language, the date and time of your request and one or more cookies that may uniquely identify your browser or your account. These logs are used for content and marketing planning purposes so that we can improve our content and services.
- User communications - When you send an email or other communications to definiti, we may retain those communications in order to process your inquiries, respond to your requests and improve our services. When you send and receive SMS messages to or from one of our services that provides SMS functionality, we may collect and maintain information associated with those messages, such as the phone number, the wireless carrier associated with the phone number, the content of the message, and the date and time of the transaction. We may use your email address to communicate with you about our services or products but never to send you communications that are not related to your purchases or that you haven't opted into.

In addition to the above, we may use the information we collect to:

- Provide, maintain, protect, and improve our services (including advertising services) and develop new services; and
- Protect the rights or property of definiti or our users.

If we use this information in a manner different than the purpose for which it was collected, then we will ask for your consent prior to such use.

definiti processes personal information on our servers in Australia. In some cases, we may process personal information outside your own country.

### 1.3 Choices

Most browsers are initially set up to accept cookies, but you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, some of definiti's features and services may not function properly if your cookies are disabled.

### 1.4 Information Sharing

definiti only shares personal information with other companies or individuals outside of definiti in the following limited circumstances:

- We have your consent. We require opt-in consent for the sharing of any sensitive personal information.

- If we provide such information to our subsidiaries, affiliated companies or other trusted businesses or persons for the purpose of processing personal information on our behalf. We require that these parties agree to process such information based on our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures.
- We have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process or enforceable governmental request, (b) enforce applicable Terms of Service, including investigation of potential violations thereof, (c) detect, prevent, or otherwise address fraud, security or technical issues, or (d) protect against harm to the rights, property or safety of definiti, its users or the public as required or permitted by law.

If definiti becomes involved in a merger, acquisition, or any form of sale of some or all of its assets, we will ensure the confidentiality of any personal information involved in such transactions and provide notice before personal information is transferred and becomes subject to a different privacy policy.

## 1.5 Information Security

We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. These include internal reviews of our data collection, storage and processing practices and security measures, including appropriate encryption and physical security measures to guard against unauthorized access to systems where we store personal data.

We restrict access to personal information to definiti's employees, contractors and agents who need to know that information in order to process it on our behalf. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution if they fail to meet these obligations.

## 1.6 Accessing And Updating Personal Information

When you use definiti's services, we make good faith efforts to provide you with access to your personal information and either to correct this data if it is inaccurate or to delete such data at your request if it is not otherwise required to be retained by law or for legitimate business purposes.

We ask individual users to identify themselves and the information requested to be accessed, corrected or removed before processing such requests, and we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or would be extremely impractical, or for which access is not otherwise required. In any case, where we provide information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort. Because of the way we maintain certain services, after you delete

your information, residual copies may take a period of time before they are deleted from our active servers and may also remain in our backup systems for a period of time.

## 1.7 Enforcement

definiti regularly reviews its compliance with this Privacy Policy. When we receive formal written complaints, it is definiti's policy to contact the complaining user regarding their concerns. We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that cannot be resolved between definiti and an individual.

## 1.8 Changes To This Privacy Policy

Please note that this Privacy Policy may change over time. We should not reduce your rights under this Privacy Policy without explicit notice. We will post any Privacy Policy changes on this page and, if the changes are significant, we will provide a more prominent notice, including, for certain services, email notification of Privacy Policy changes.