

## **1. We respect your privacy**

1.1. H2i respects your right to privacy and is committed to safeguarding the privacy of our customers and website visitors. Where required, we adhere to the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth).

1.2. H2i adheres to the EU General Data Protection Regulation (GDPR).

1.3. This policy sets out how we collect and treat your personal information.

1.4. "Personal information" is information we hold which is identifiable as being about you.

## **2. Collection of personal information**

2.1. H2i will, from time to time, receive and store personal information you enter onto our website, provided to us directly or given to us in other forms.

2.2. This may include: names date of birth; job titles; contact information including addresses, email addresses, phone numbers, fax numbers etc; demographic information; other information relevant to the customisation of a document on the site; information about goods and services you have ordered; information from enquiries you have made; information about your legal needs; information about your business or personal affairs; communication between us; credit card information; other information relevant to client interviews and/or promotions; and any other information requested on this Site or otherwise required by us or provided by you.

2.3. We may collect additional information at other times, including but not limited to, when you provide feedback, when you provide information about your personal or business affairs, change your content or email preference, respond to surveys and/or promotions, provide financial or credit card information, or communicate with our customer support.

## **3. How we collect your personal information**

3.1. H2i collects personal information from you in a variety of ways, including when you interact with us electronically or in person, when you access our website and when we provide our services to you. We may receive personal information from third parties. If we do, we will protect it as set out in this Privacy Policy.

## **Use your personal information**

4.1. Personal information is only collected in situations where you have consented; where there is a legitimate interest to disclose the information and; where the disclosure of personal information is required for the fulfilment of your contract with H2i. Please consult our terms and conditions for further information on the contractual obligations between users and H2i.

4.2. H2i may use personal information collected from you to provide you with information, updates and our services. We may also make you aware of new and additional products, services and opportunities available to you. We may use your personal information to improve our products and services and better understand your needs.

4.3. If you require further information about the legitimate interest legal basis under the GDPR, please see Section 12 'How to contact us'.

## **5. Disclosure of your personal information**

5.1. We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this Policy. Personal information is only supplied to a third party when it is required for the delivery of our services.

5.2. We may from time to time need to disclose personal information to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, in the course of a legal proceeding or in response to a law enforcement agency request.

5.3. We may also use your personal information to protect the copyright, trademarks, legal rights, property or safety of H2i, its customers or third parties.

5.4. If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our user databases, together with any personal information and non-personal information contained in those databases. This information may be disclosed to a potential purchaser under an agreement to maintain confidentiality. We would seek to only disclose information in good faith and where required by any of the above circumstances.

5.5. By providing us with personal information, you consent to the terms of this Privacy Policy and the types of disclosure covered by this Policy. Where we disclose your personal information to third parties, we will request that the third party follow this Policy regarding handling your personal information. We will ensure that third parties have stringent safeguards when handling your personal information.

5.6. Personal information is only disclosed to third parties in situations where you have consented to the transfer, where there is a legitimate interest to disclose the information and; where you are contracted to provide this personal information.

## **6. International Transfer of your Personal Data**

6.1. Information that we collect may from time to time be stored, processed in or transferred between parties located in countries outside of Australia.

6.2. We provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA). The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area. It may also be processed by staff operating outside the European Economic Area who work for us or for one of our suppliers. These countries include but are not limited to the United States of America (US).

6.3. We have hosting facilities in Australia and the US. Transfers to the US will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission, a copy of which can be obtained from <https://www.privacyshield.gov/>. This framework protects the fundamental rights of anyone in EU whose personal data is transferred to US for commercial purposes. This arrangement imposes strong data protection obligations on companies receiving personal data from the EU, safeguards on US government data, effective protection and redress for individuals, and is subject to annual joint review by EU and US.

6.4. You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

## **7. Security of your personal information**

7.1. H2i is committed to ensuring that the information you provide to us is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

7.2. The transmission and exchange of information is carried out at your own risk. We cannot guarantee the security of any information that you transmit to us, or receive from us. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that personal information that we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

## **8. Access to your personal information**

8.1. You may request details of personal information that we hold about you in accordance with the provisions of the *Privacy Act 1988* (Cth) and the EU GDPR 2018 . If you would like a copy of the information which we hold about you or believe that any information we hold on you is inaccurate, out of date, incomplete, irrelevant or misleading, please email us at [support@H2i.com](mailto:support@H2i.com).

8.2 You have the following rights under the GDPR:

8.2.1. Right of Access – the right to access the personal information that we hold or process about you;

8.2.2. Right to Rectification – the right to update, correct or amend the personal information that we hold or process about you;

8.2.3. Right to Erasure – the right to request remove personal information that we hold about you

8.2.4. Right to Restrict – the stop processing all or some of your personal data;

8.2.5. Right to Object – the right to object to your personal information being used for direct marketing purposes;

8.2.6. Right to Data Portability – the right to request a copy of your personal data in electronic format;

8.2.7. Right not to be subject to Automated Decision making – the right to not be subject to a decision based solely on automated decision making, including profiling,

where the decision would have a legal effect on you or produce a similarly significant effect.

8.3. We reserve the right to refuse to provide you with information that we hold about you, in certain circumstances set out in the Privacy Act.

## **9. Complaints about privacy**

9.1. If you have any complaints about our privacy practices, please feel free to send in details of your complaints to 'H2i – level 2/23 Foster Street Surry Hills NSW, 2010. We take complaints very seriously and will respond shortly after receiving written notice of your complaint. H2i is the data controller for the purposes of the personal data processed under this privacy policy.

## **10. Changes to Privacy Policy**

10.1. Please be aware that we may change this Privacy Policy in the future. We may modify this Policy at any time, in our sole discretion and all modifications will be effective immediately upon our posting of the modifications on our website or notice board. Please check back from time to time to review our Privacy Policy.

## **11. Website**

### *11.1. When you visit our website*

When you come to our website H2i we may collect certain information such as browser type, operating system, website visited immediately before coming to our site, etc. This information is used in an aggregated manner to analyse how people use our site, such that we can improve our service.

### *11.2. Cookies*

We may from time to time use cookies on our website. Cookies are very small files which a website uses to identify you when you come back to the site and to store details about your use of the site. Cookies are not malicious programs that access or damage your computer. Most web browsers automatically accept cookies but you can choose to reject cookies by changing your browser settings. However, this may prevent you from taking full advantage of our website.

11.3. Our website may from time to time use cookies to analyse website traffic and help us provide a better website visitor experience. In addition, cookies may be used to serve relevant ads to website visitors through third party services such as Google Adwords. These ads may appear on this website or other websites you visit.

#### 11.4. *Third party sites*

Our site may from time to time have links to other websites not owned or controlled by us. These links are meant for your convenience only. Links to third party websites do not constitute sponsorship or endorsement or approval of these websites. Please be aware that H2i is not responsible for the privacy practices of other such websites. We encourage our users to be aware, when they leave our website, to read the privacy statements of each and every website that collects personal identifiable information.

## **12. How to Contact Us**

12.1. Thank you for reading our Privacy Policy. If you have any questions relating to this Policy, please contact our data protection officer, H2i Operations PTY LTD, by emailing [support@H2i.com](mailto:support@H2i.com).