

PRIVACY POLICY

1. Introduction

The Crucial Team respects and upholds your rights to privacy protection under the Australian Privacy Principles contained in the Privacy Act 1988.

This policy describes how we manage any personal information we have about you.

This policy does not apply to personal information about our personnel and job applicants. Please contact human resources for privacy details applicable in that case.

2. What personal information about me does The Crucial Team collect or hold?

The Crucial Team may hold the following information about you:

- name and contact details that you provide during the user registration process (such as street address, telephone number(s), email address) or subsequently updated;
- information that you provide in the course of using our online services (such as responses to questions or personal journal entries);
- usage and transaction details in relation to your use of our online services; and
- any additional information that you provide to our help desk or through any customer survey.

We may be unable to provide our online services to you if you do not provide some personal information. For example, without name and contact details it is impractical for us to provide online services to you.

Like many other websites, our website and online services use cookies. A cookie is information sent by our website to your browser that is then stored on your computer. It is used to identify your computer to us, and to remember previous requests you have made when you return to the website. This allows us to improve the functionality of our website and online services for your return visits.

If at any time you provide the personal information of another person to us then you must ensure that that person has read and understood this policy and separately consents to that personal information being used and disclosed by us in the ways described in this privacy policy.

3. How does The Crucial Team collect and hold personal information?

As indicated above, we collect any personal information we hold about you through:

- the registration process;
- your use of our online services; or
- your contact with our help desk.

The way we manage any personal information about you depends upon which of the following three categories it falls into:

- **Journal Free Text** – this is information that you input in the course of responding to our online personal development service known as “Crucendo”, where your input is not limited to merely selecting from of a number of pre-determined choices (e.g. where you type text of your choice, rather than clicking a button)
- **Journal Fixed Responses** - this is information that you input in the course of responding to Crucendo where your input is limited to merely selecting from of a number of pre-determined choices (e.g. where you click a button, rather than typing text of your choice)
- **General Information** – this is any personal information that is not Journal Free Text or Journal Fixed Responses (e.g. your name and contact details, usage records).

We hold all personal information only in electronic form (except in rare cases, such as where in the course of administration of our business we might also need to make a handwritten note of some General Information, such as a user’s name or contact details).

We hold Journal Free Text and Journal Fixed Responses only at the applicable data centre of the cloud computing provider that we use from time to time (**Cloud Provider**). We may store General Information both with the Cloud Provider and on our own hardware.

All Journal Free Text stored at the Cloud Provider is held in encrypted form. This enhances the security of that information, so that in the unlikely event that there is a security breach at the Cloud Provider, the information should still be protected by the encryption.

If you terminate the provision of online services to you by us, then we will promptly delete your (encrypted) Journal Free Text (although it is technically possible that the Cloud Provider may retain an encrypted copy for some time after that as part of its usual backup processes). We may retain a copy of your Journal Fixed Responses, but only for the anonymous statistical purposes described below.

4. What does The Crucial Team do with personal information about me?

We use the personal information we hold about you:

- to assist in providing our online services to you (e.g. so that you can review previous journal entries) and to customise our website or online services according to your interests and preferences;
- to assist where you contact our help desk;
- to generate anonymous statistics as described below;
- for our internal administrative, marketing, planning, product development and research requirements;
- to communicate promotional offers, special events, new services or other information which we think might be of use, interest or help (e.g. support or counselling services); and
- to protect our legal interests (e.g. defending a legal claim) or in connection with a sale of our business or company.

However, we will NEVER sell your information. Except in the unlikely event that we are required by law to provide it to a third party (e.g. a court order requires that we provide it for the purposes of a criminal investigation or trial) we also will not disclose personal information about you to any person except on a confidential basis to business partners that we use in the ordinary operation of our business, such as for data processing or emailing, or to any purchaser of our business.

In addition, we will NEVER use your Journal Free Text other than to display it back to you (e.g. to allow you to view previous journal entries). We realise that it might well be highly personal and that you might not want ANYBODY else to read it. Except if we are required by law to provide it to a third party, at all times it will remain in encrypted form and will not be viewed by any of our personnel or any other person.

The above paragraph also applies to Journal Fixed Responses, except that we may also use Journal Fixed Responses to compile statistics regarding responses to questions by our users generally. Your Journal Fixed Responses will not be viewed by any of our personnel or other person in the course of compiling those statistics (as the compilation will be automated), and the compiled statistics will not identify you.

At any time you may opt out of receiving any communications from us (other than as required for the operation of our business, e.g. regarding the status of your account or payment of any fees (if applicable)).

5. Overseas disclosure

The Crucial Team does not disclose personal information to any recipient outside Australia. Where we use a Cloud Provider, we require that the Cloud Provider stores your personal information only on servers located in Australia.

6. Access and correction

You may request access to personal information we hold about you by writing to The Crucial Team's Privacy Officer at the address below. If we hold personal information that you are

entitled to access (and that you cannot already access through ordinary use of our online services), then within a reasonable period after your request we will provide you with access. If we refuse your request then we will give you a written statement setting out the reasons for the refusal (unless unreasonable to give them), and the process we provide if you wish to complain about the refusal.

We will provide access in the manner you request if it is reasonable and practicable to do so. If it is not reasonable and practicable to provide access in that manner then we will endeavour to provide you with a suitable range of choices as to how you access it (e.g. emailing it to you).

If you believe that personal information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, then you may request amendment of it. We will consider if the information requires amendment and respond to you within a reasonable period after your request. If we do not agree that it should be amended, then we will add a note to the personal information stating that you disagree with it and will also give you a written statement setting out the reasons for the refusal (unless unreasonable to give them), and the process we provide if you wish to complain about the refusal.

Our contact details are as follows:

The Crucial Team
PO Box 4081, Frankston VIC 3199, Australia
Phone: +61 3 8362 3703
Email: privacy@thecrucialteam.com

7. Complaints

Any questions about this policy, or any complaint regarding treatment of your privacy by The Crucial Team, should also be made in writing to the address above.

If you lodge a complaint, then we will let you know the name of the individual responsible for taking care of it, and will tell you when we will provide a full response.

8. Miscellaneous

In this policy "personal information" has the same meaning as under the Privacy Act. References to "The Crucial Team" are to The Crucial Team Australia Pty Ltd (ACN 612 428 378), which has issued this policy.

This policy represents our policy as at 7 June 2016. We may change this policy from time to time, subject to any requirements in our agreements with the users of our online services.