

## TRIANGULATE HOLDINGS PTY LTD ACN 641 803 616

### PRIVACY POLICY

#### 1. General

1.1 Triangulate Holdings Pty Ltd ACN 641 803 616 (**Triangulate Knowledge**) is committed to ensuring your privacy and providing transparency and control over your Information collected during your visit to our website <https://www.triangulateknowledge.com/>, by telephone, or directly from you. We are committed to maintaining the confidentiality of the Information that you provide to us and we will take all reasonable precautions to protect your Information from unauthorised access and use.

1.2 Triangulate Knowledge is required to comply with the *Privacy Act 1988* (Cth) and is bound by the Australian Privacy Principles. The Australian Privacy Principles are set out in detail at <https://www.oaic.gov.au/privacy/australian-privacy-principles-guidelines/>.

1.3 To provide you with our Services, Triangulate Knowledge may be required to collect Information about you. By using or interacting with our Services, you are entering into a binding contract with us and consenting to the use of your Information as detailed in this Privacy Policy. If you do not agree to this Privacy Policy in addition to our general terms of service, please do not use our Services.

1.4 This Privacy Policy sets out how we deal with your Information.

#### 2. Definitions

2.1 In this Privacy Policy:

**Act** means *Privacy Act 1988* (Cth).

**Australian Privacy Principles** mean the Australian Privacy Principles contained in Schedule 1 of the Act.

**Consultant** means the consultants nominated by Triangulate Knowledge or otherwise as agreed between the parties from time to time.

**Information** means information about a Person that is Personal Information and/or Sensitive Information.

**Key People** means the individuals nominated by Triangulate Knowledge or otherwise as agreed between the parties from time to time.

**Person** means a natural person.

**Personal Information** means information or an opinion about an identified Person, or a Person who is reasonably identifiable:

- (a) whether the information or opinion is true or not;
- (b) whether the information or opinion is recorded in a material form or not;
- (c) may include:
  - (i) your contact details including your name, email address, your organisation (if applicable), mailing address, phone number and mobile phone number;
  - (ii) your country and state or territory of you or your organisation;

- (iii) technical data associated with web browsing, cookie data, and date and time of web site visit(s), and other data for analytical purposes;
- (iv) your or your organisation's financial information, such as your bank account or credit card details, for any relevant purchases or for the purposes of credit eligibility; and
- (v) any other personal information you provide to us in relation to the website or our services.

**Sensitive Information** means:

- (a) information or an opinion about a Person's:
  - (i) racial or ethnic origin;
  - (ii) political opinions;
  - (iii) membership of a political association;
  - (iv) religious beliefs or affiliations;
  - (v) philosophical beliefs;
  - (vi) membership of a professional or trade association;
  - (vii) membership of a trade union;
  - (viii) sexual orientation or practices; or
  - (ix) criminal record,that is also Personal Information; or
- (b) health information about a Person; or
- (a) genetic information about a Person that is not otherwise health information; or
- (b) biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or
- (c) biometric templates.

**Services** means the performance by the Consultant or its Key People of consulting services (the scope of which may be agreed between the parties from time to time in writing).

**Third-Parties** means those entities to which we provide or sell Information about You including Consultants and Key People.

**You** means the Person who provides the Information to us.

### **3. Collection of your Information**

#### **3.1 Anonymity**

- (a) Due to the nature of the Services Triangulate Knowledge provides, it is impractical for us to deal with You without knowing your full name, address, telephone number, email address, and other contact details.

- (b) When You enquire about or engage our Services, You are required to use truthful and accurate information.

### 3.2 Personal Information

We collect Personal Information from and about You for the following purposes:

- (a) the provision of the Services to You (Primary Purpose);
- (b) any purpose secondary to the Primary Purpose; and
- (c) direct marketing by us.

### 3.3 Sensitive Information

- (a) We will only disclose your Sensitive Information for the purposes for which You provide it to us, or for directly related purposes that You would reasonably expect, or if You agree to the disclosure.
- (b) The only Sensitive Information that we will request from you is your membership of a professional or trade association (where applicable).

## 4. Unsolicited information

4.1 If Triangulate Knowledge receives Information from You that we did not solicit from You and You draw our attention to this, we will, within a reasonable period after receiving the Information, determine whether or not we could have lawfully collected the Information had we solicited it.

4.2 If we determine that we could have lawfully collected the Information had we solicited it, we will deal with that Information in accordance with this Privacy Policy. If, however, we determine that we could not have lawfully collected the Information had we solicited it, then we will destroy or de-identify that Information as soon as practicable, where it is lawful and reasonable to do so.

## 5. Direct marketing

5.1 Triangulate Knowledge may use or disclose your Personal Information (but not your Sensitive Information) for the purpose of direct marketing by, or on behalf of, us.

## 6. Disclosure to overseas recipients

6.1 Triangulate Knowledge will not disclose Personal Information to overseas recipients, other than for the sole purpose of providing Services to You.

## 7. Third-Parties

7.1 Sometimes Triangulate Knowledge contracts with Third-Parties to perform Services on our behalf. When we do that, we will only provide those Third-Parties with such Information about You as they need to perform those Services.

7.2 By providing your Personal Information to us, or to a Third-Party with whom we contract You consent to the transfer of that information to our Third-Party service providers

### 7.3 Data storage

- (a) Our Third-Party service providers may store and process information provided by You on servers located outside Australia.
- (b) The locations of servers located outside Australia generally include member countries of the European Union.

## **8. Storage and security of Information**

8.1 We will take reasonable steps to protect Information that we hold from:

- (a) misuse, interference and loss; and
- (b) unauthorised access, modification or disclosure.

## **9. Business transfer**

9.1 If we were to sell our business or substantially all of our assets, your Information would be one of the assets that is transferred to a buyer on the completion of such a sale.

9.2 You consent to:

- (a) us transferring your Information to a Third Party that buys our business or substantially all of our assets; and
- (b) the Third-Party buyer continuing to use your Information as set out in this Privacy Policy.

## **10. Accessing and correcting your personal information**

10.1 Triangulate Knowledge takes reasonable steps to keep your personal information accurate, complete and updated. However, it is your responsibility to provide us with any changes or updates to your personal details.

10.2 If You ask, in most cases we will give You access to the Information that we hold about You and take reasonable steps to correct it if we consider that it is incorrect.

## **11. Changes to this Privacy Policy**

11.1 Triangulate Knowledge may make changes to this Privacy Policy from time to time, so please visit this Privacy Policy regularly. Your continued use of our Services constitutes acceptance of any changes.

## **12. Does Triangulate Knowledge record telephone calls?**

12.1 Triangulate Knowledge will always advise you if it is recording telephone calls with You for any purpose.

## **13. Making a complaint**

13.1 Triangulate Knowledge is committed to providing You with the best possible service for your needs and is committed to resolving your complaint in a fair and timely manner.

13.2 Your feedback is valuable to us and we strive to resolve your concerns as effectively as possible. You can lodge a complaint to us in writing about how we have handled your Information. We will respond to the complaint within ninety (90) days.

## **14. Contact us**

14.1 You can contact us at:

Triangulate Knowledge  
Level 10, 70 Pitt St, Sydney, NSW Australia  
[Info@TriangulateKnowledge.com](mailto:Info@TriangulateKnowledge.com)  
[www.TriangulateKnowledge.com/](http://www.TriangulateKnowledge.com/)  
Telephone: +61291887832