

## PRIVACY POLICY

Flexi-Tribe Pty Ltd

We respect your privacy

Flexi-Tribe Pty Ltd respects your right to privacy and is committed to safeguarding the privacy of our customers and website visitors. This policy sets out how we collect and treat your personal information.

We adhere to the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) and to the extent applicable, the EU General Data Protection Regulation (GDPR).

“Personal information” is the information we hold which is identifiable as being about you. This includes information such as your name, email address, identification number, or any other type of information that can reasonably identify an individual, either directly or indirectly.

You may contact us in writing at 37 Ragamuffin Point, Halls Head WA 6210 for further information about this Privacy Policy.

What personal information is collected

Flexi-Tribe Pty Ltd will, from time to time, receive and store the personal information you submit to our website, provided to us directly or given to us in other forms.

You may provide basic information such as your name, phone number, address, and email address to enable us to send you information, provide updates and process your product or service order.

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.

Additionally, we may also collect any other information you provide while interacting with us.

How we collect your personal information

Flexi-Tribe Pty Ltd 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 engage in business activities with you. We may receive personal information from third parties. If we do, we will protect it as set out in this Privacy Policy.

By providing us with personal information, you consent to the supply of that information subject to the terms of this Privacy Policy.

How we use your personal information

Flexi-Tribe Pty Ltd may use personal information collected from you to provide you with information about our products or services. We may also make you aware of new and additional products, services, and opportunities available to you.

Flexi-Tribe Pty Ltd will use personal information only for the purposes that you consent to. This may include to:

- provide you with products and services during the usual course of our business activities;
- administer our business activities;
- manage, research, and develop our products and services;
- provide you with information about our products and services;
- communicate with you by a variety of measures including, but not limited to, by telephone, email, SMS, or mail; and
- investigate any complaints.

If you withhold your personal information, it may not be possible for us to provide you with our products and services or for you to fully access our website.

We may disclose your personal information to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, legal proceedings, or in response to a law enforcement agency request.

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 by law our user databases, together with any personal information and non-personal information contained in those databases.

#### Disclosure of your personal information

Flexi-Tribe Pty Ltd 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 privacy policy.

If we do disclose your personal information to a third party, we will protect it in accordance with this privacy policy.

#### General Data Protection Regulation (GDPR) for the European Union (EU)

Flexi-Tribe Pty Ltd will comply with the principles of data protection set out in the GDPR for the purpose of fairness, transparency, and lawful data collection and use.

We process your personal information as a Processor and/or to the extent that we are a Controller as defined in the GDPR.

We must establish a lawful basis for processing your personal information. The legal basis for which we collect your personal information depends on the data that we collect and how we use it.

We will only collect your personal information with your express consent for a specific purpose and any data collected will be to the extent necessary and not excessive for its purpose. We will keep your data safe and secure.

We will also process your personal information if it is necessary for our legitimate interests, or to fulfill a contractual or legal obligation.

We process your personal information if it is necessary to protect your life or in a medical situation, it is necessary to carry out a public function, a task of public interest or if the function has a clear basis in law.

We do not collect or process any personal information from you that is considered "Sensitive Personal Information" under the GDPR, such as personal information relating to your sexual orientation or ethnic origin unless we have obtained your explicit consent, or if it is being collected subject to and in accordance with the GDPR.

You must not provide us with your personal information if you are under the age of 16 without the consent of your parent or someone who has parental authority for you. We do not knowingly collect or process the personal information of children.

Your rights under the GDPR

If you are an individual residing in the EU, you have certain rights as to how your personal information is obtained and used. Flexi-Tribe Pty Ltd complies with your rights under the GDPR as to how your personal information is used and controlled if you are an individual residing in the EU

Except as otherwise provided in the GDPR, you have the following rights:

- to be informed how your personal information is being used;
- access your personal information (we will provide you with a free copy of it);
- to correct your personal information if it is inaccurate or incomplete;
- to delete your personal information (also known as “the right to be forgotten”);
- to restrict processing of your personal information;
- to retain and reuse your personal information for your own purposes;
- to object to your personal information being used; and
- to object against automated decision-making and profiling.

Please contact us at any time to exercise your rights under the GDPR at the contact details in this Privacy Policy.

We may ask you to verify your identity before acting on any of your requests.

#### **Hosting and International Data Transfers**

Information that we collect may from time to time be stored, processed in, or transferred between parties or sites located in countries outside of Australia. These may include but are not limited to Australia and the Philippines.

We and our other group companies have offices and/or facilities in Australia and the Philippines. Transfers to each of these countries will be protected by appropriate safeguards, these include one or more of the following: the use of standard data protection clauses adopted or approved by the European Commission which you can obtain from the European Commission Website; the use of binding corporate rules, a copy of which you can obtain from Flexi-Tribe Pty Ltd’s Data Protection Officer.

The hosting facilities for our website are situated in Australia and the Philippines. Transfers to each of these countries will be protected by appropriate safeguards, these include one or more of the following: the use of standard data protection clauses adopted or approved by the European Commission which you can obtain from the European Commission Website; the use of binding corporate rules, a copy of which you can obtain from Flexi-Tribe Pty Ltd’s Data Protection Officer.

Our Suppliers and Contractors are situated in Australia and the Philippines. Transfers to each of these countries will be protected by appropriate safeguards, these include one or more of the following: the use of standard data protection clauses adopted or approved by the European Commission which you can obtain from the European Commission Website; the use of binding corporate rules, a copy of which you can obtain from Flexi-Tribe Pty Ltd’s Data Protection Officer.

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.

### **Security of your personal information**

Flexi-Tribe Pty Ltd is committed to ensuring that the information you provide to us is secure. In order to prevent unauthorized 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 unauthorized access, modification, and disclosure.

Where we employ data processors to process personal information on our behalf, we only do so on the basis that such data processors comply with the requirements under the GDPR and that have adequate technical measures in place to protect personal information against unauthorized use, loss and theft.

The transmission and exchange of information are 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 unauthorized disclosures of information, we cannot assure you that the personal information that we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

### **Access to your personal information**

You may request details of personal information that we hold about you in accordance with the provisions of the Privacy Act 1988 (Cth), and to the extent applicable to the EU GDPR. 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 [natasja@flexi-tribe.com](mailto:natasja@flexi-tribe.com).

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 or any other applicable law.

### **Complaints about privacy**

If you have any complaints about our privacy practices, please feel free to send in details of your complaints to [natasja@flexi-tribe.com](mailto:natasja@flexi-tribe.com). We take complaints very seriously and will respond shortly after receiving written notice of your complaint.

### **Changes to Privacy Policy**

Please be aware that we may change this Privacy Policy in the future. We may modify this Policy at any time, at 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.

### **Website**

When you visit our website

When you come to our website ([www.flexi-tribe.com](http://www.flexi-tribe.com)), 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 analyze how people use our site, such that we can improve our service.

### **Cookies**

We may from time to time use cookies on our website. Cookies are very small files that 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. 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.

### **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 Flexi-Tribe Pty Ltd 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 personally identifiable information.

## CYBERSECURITY POLICY

### 1. Intent and Scope

This security policy (policy) provides the basis of security management within Flexi-Tribe Pty Ltd.

This policy applies to all of Flexi-Tribe Pty Ltd employees, contractors, volunteers, vendors and anyone else who may have any type of access to Flexi-Tribe Pty Ltd systems, software, and hardware.

Effective protection of business information creates a competitive advantage, both in the ability to preserve the reputation of Flexi-Tribe Pty Ltd and in reducing the risk of the occurrence of negative events and incidents.

### 2. Password Requirements

To avoid employees' work account passwords being compromised, these best practices are advised for setting up passwords:

- (a) Use at least 8 characters (must contain capital and lower-case letters, numbers, and symbols)
- (b) Do not write down the password and leave it unprotected
- (c) Do not exchange credentials when not requested or approved by the supervisor
- (d) Change passwords every 12 months

### 3. Email Security

Emails can contain malicious content and malware. In order to reduce harm, employees should employ the following strategies:

- (a) Do not open attachments or click any links where content is not well explained
- (b) Check the email addresses and names of senders.
- (c) Search for inconsistencies
- (d) Block junk, spam, and scam emails
- (e) Avoid emails that contain common scam subject lines such as prizes, products, and money transfers

If an employee is not sure that an email or any type of data is safe, the employee should contact the Operations Manager.

### 4. Device Security and Using Personal Devices

Logging into any work accounts for personal devices such as mobile phones, tablets or laptops, can put Flexi-Tribe Pty Ltd data at risk. Flexi-Tribe Pty Ltd does not recommend accessing any Flexi-Tribe Pty Ltd data from personal devices. However, if this cannot be avoided, employees are obligated to keep their devices in a safe place and not be exposed to anyone else.

Employees are recommended to follow these best practice steps:

- (a) Keep all electronic devices' passwords secure and protected
- (b) Logging into accounts should only be performed through safe networks
- (c) Install security updates on a regular basis
- (d) Upgrade antivirus software on a regular basis
- (e) Never leave devices unprotected and exposed
- (f) Lock computers when leaving the desk

## 5. Transferring Data

Data transfer is a common cause of cybercrime. Employees should follow these best practices when transferring data:

- (a) Avoid transferring personal information such as customer data and employee information
- (b) Adhere to the relevant personal information legislation
- (c) Data should only be shared over authorized networks
- (d) If applicable, destroy any sensitive data when it is no longer needed

## 6. Working Remotely

When working remotely, all the security policies and procedures must be followed.

## 7. Acceptable Use

User accounts on work systems are only to be used for the business purposes of Flexi-Tribe Pty Ltd and not to be used for personal activities.

Employees are responsible for protecting all confidential information used and/or stored on their accounts. This includes their user logins and passwords. Employees are prohibited from making unauthorized copies of such confidential information and/or distributing it to unauthorized persons outside of Flexi-Tribe Pty Ltd.

Employees must not purposely engage in any activity with the intent to: harass other users; degrade the performance of the system; divert system resources to their own use; or gain access to Flexi-Tribe Pty Ltd systems for which they do not have authorization.

## 8. Security Requirements

Employees must not install unauthorized software. The company may at any time introduce a whitelist of approved/trusted programs. If this occurs then only these programs may be used by employees.

Employees should perform daily backups of important new/changed data, software and configuration settings.

Employees must not use unauthorized devices on their workstations unless they have received specific authorization from our Operations Manager.

Employees must not attempt to turn off or circumvent any security measures.

Employees must report any security breaches, suspicious activities, or issues that may cause a cyber security breach to the Operations Manager.

## **9. Disciplinary Action**

If this policy is breached, one or more of the following disciplinary actions will take place:

- (a) Incidents will be assessed on a case-by-case basis
- (b) In case of breaches that are intentional or repeated or cases that cause direct harm to Flexi-Tribe Pty Ltd, employees may face serious disciplinary action
- (c) Subject to the gravity of the breach, formal warnings may be issued to the offending employee