

SQUIDLY PRIVACY POLICY

Last updated: June 06, 2024

This Privacy Policy describes the personal data we collect and/or process (which may include collecting, organising, structuring, storing, using, or disclosing) to provide products and services offered directly by SQUID EYE PTY LTD ("Squidly"), including Squidly's websites, its meetings, related collaborative features, and Squidly App Marketplace ("Squidly products and services" or "products and services").

1. Introduction

Squidly ("we", "our" and "us") is committed to responsible privacy practices and to complying with privacy laws, to the extent they apply to us.

This Privacy Policy sets out our policies on the management of personal information, the purposes for which we use this information, and to whom this information is disclosed.

Should we ask you to provide certain information by which you can be identified when using our website, our products and services, you can be assured that it will only be used in accordance with this Privacy Policy, unless we clearly state otherwise to you in connection with any particular products and services.

By accessing and using our products and services, you expressly acknowledge that we may collect and process your personal data in accordance with this Privacy Notice.

We may change or update our Privacy Policy from time to time. At any time, the latest version of our Privacy Policy is available from our website as www.squidly.com.au.

2. What is personal information?

In this Privacy Policy, "personal information" has the meaning set out in the Privacy Act. Essentially, personal information is information or an opinion about an individual who is reasonably identifiable.

3. What types of personal information do we collect?

The types of personal information we collect from you depends on the circumstances in which the information is collected.

We may collect contact details including your name, address, email address, occupation, place of work, phone number and your date of birth / age. We may also collect answers you provide to questions we ask and other information in relation to your dealings with us.

If you are a patient or otherwise participate in a video consultation ("Participant"), on behalf of our clients, we will collect as little information about you as necessary to provide the products and services. We may collect head and eye tracking data in real-time, without

storing any video or audio recordings, and without collecting any other personal information during the process.

To this extent, as a Participant, when you use the products and services, using the camera feed on your device, the products and services automatically computes your head and face position, as well as an estimation of your eye gaze coordinates ("Tracking Data"). The computation occurs in real-time, and the camera feed is not transferred to our products and services and we neither record nor store them.

We only collect the output of this Tracking Data which is necessary to provide our technology and the services for our clients. We do not store Tracking Data in a manner which permits us to identify you, and do not link it to other information about you.

As a rule, we do not collect, store or process your session content.

Certain personal data are also collected in an automated manner including logs and analytics data about your activities, as further described in this Privacy Notice. You may define certain authorisations relating to the automatic collection of your personal data when you configure your device according to available functionalities.

4. How do we collect your personal information?

We collect personal information in a number of ways. The most common ways we collect your personal information are:

- directly from you when you provide it to us or our agents or contractors;
- via our websites or when you communicate with us online (including when you use our products and services);
- during use of our products and services (including accessing your webcam video and microphone audio).

Your personal information may be held as an electronic record.

5. For what purposes do we collect, use and disclose your personal information?

The purposes for which we use and disclose your personal information will depend on the circumstances in which we collect it. Whenever practical, we endeavour to inform you why we are collecting your personal information, how we intend to use that information and to whom we intend to disclose it at the time we collect your personal information.

We may use or disclose:

- your personal information for the purposes for which we collected it and you have consented to (and related purposes which would be reasonably expected by you);
- as otherwise authorised or required by law.

In general, we collect, use and disclose your personal information so that we can do business together and for purposes connected with our business operations and products and services.

Some of the specific purposes for which we collect, use and disclose personal information are:

- to respond to you if you have requested information (including via our websites or an email or other correspondence you send to us);
- to operate the product and service and provide related product and service (including online consultation and shared session);
- to send you our newsletter and other advertising information;
- for internal analysis and statistical purposes in order to improve our products and services;
- to comply with our other legal obligations (including if we need to disclose certain information to public authorities);
- to address any issues or complaints that we or you have regarding our relationship or products and services.
- to contact you regarding the above, including via electronic messaging such as SMS and email, by mail, by phone or in any other lawful manner.

6. Direct marketing

Direct marketing involved communicating directly with you for the purpose of promoting goods and services to you and to provide you with special offers. We may use the personal information you provide to directly market to you via a range of methods including mail, telephone, and if you opt-in, email or video. You can unsubscribe from our direct marketing, or change your contact preferences, by contacting us (see Section 14 of this Privacy Policy).

7. What happens if you don't provide personal information?

Generally, you have no obligation to provide to us any personal information requested by us. However, if you choose to withhold certain requested personal information, we may not be able to provide you with the products and services.

8. To whom do we disclose personal information?

We believe that the products and services should be widely available. To this end, we provide tools to third service providers ("our Partners") enabling them to integrate our products and services into their own product and for the purposes disclosed in Section 5. When doing so (and subject to their acceptance of our licensing terms), the Partner can utilise the products and services for their own purposes.

If you are a user or customer of any of our Partners ("a User-of-a-Partner"), please read the following: this Privacy Policy does not address how our Partners collect and use your personal data. If you would like to make any requests or queries regarding your personal information, please contact such Partner(s) directly. For example, if you wish to request to access, correct, amend, or delete inaccurate personal information that was originally collected by one of our Partners, please direct your query to the relevant Partner.

Our partners include:

- virtual conferencing platforms

- institutes and education centres

9. Does personal information leave Australia?

Except as described in this section, we do not generally disclose your personal information outside of the country you reside.

We will take reasonable steps to ensure that our electronic storage service provide (and any such overseas recipients which we may use) do not breach privacy laws in relation to such information.

10. How do we protect personal information?

We will take reasonable steps to keep any personal information we hold about you secure, including via encryption methods. However, except to the extent liability cannot be excluded due to the operation of statute, we exclude all liability (including in negligence) for the consequences of any unauthorised access to, disclosure of, misuse of or loss or corruption of your personal information. Nothing in this Privacy Policy restricts, excludes or modifies or purports to restrict, exclude or modify any statutory consumer rights under any applicable law including the Competition and Consumer Act 2010 (Cth).

Please notify us immediately if you become aware of any breach of security.

11. Accuracy of the personal information we hold

We try to maintain your personal information as accurately as reasonably possible. We rely on the accuracy of personal information as provided to us both directly (from you) and indirectly.

We encourage you to contact us if the personal information we hold about you is incorrect or to notify us of a change in your personal information. Our contact details are set out in Section 21 of this Privacy Policy.

12. Links, cookies and use of our websites and applications

Our website may contain links to other sites. This Privacy Policy applies to our website and products and services and any linked sites which are not operated or controlled by us. We encourage you to read the privacy policies of each website that collects your personal information.

We may use "cookies" and similar technology on our websites and in other technology applications. The use of such technologies is an industry standard and helps to monitor the effectiveness of advertising and how visitors use our websites/applications. We may use such technologies to generate statistics, measure your activity, improve the usefulness of our websites/applications and to enhance the "customer" experience.

If you prefer not to receive cookies you can adjust your Internet browser to refuse cookies or to warn you when cookies are being used. However, our websites may not function properly or optimally if cookies have been turned off.

13. Links to third party sites

Squidly's website may contain links to third party websites that are not operated or controlled by us. Please note that Squidly is not responsible for the privacy or security practices of those third part web sites and those sites are not covered by this Privacy Policy.

14. How can you access and correct personal information we hold about you?

You may seek access to personal information which we hold about you by contacting us as described in Section 16 of this Privacy Policy. We will provide access to that information in accordance with the relevant privacy laws, subject to certain exemptions which may apply. We may require that the person requesting access provide suitable identification and where permitted by law we may charge an administration fee for granting access to your personal information.

If you become aware that any personal information we hold about you is incorrect or if you wish to update your information, please contact us (See Section 16 of this Privacy Policy).

15. Queries, comments and complaints about handling of personal information

If you have any questions, comments or complaints about our collection, use or disclosure of personal information, or if you believe that we have not complied with this Privacy Policy or relevant privacy laws, please contact us (see Section 16 of this Privacy Policy).

When contacting us please provide as much detail as possible in relation to your question, comment or complaint.

We will take any privacy complaint seriously and any complaint will be assessed with the aim of resolving any issue in a timely and efficient manner. We request that you cooperate with us during this process and provide us with any relevant information we may need.

If you are not satisfied with the outcome of our assessment of your complaint, you may wish to contact the Office of the Australian Information Commissioner.

16. How can you contact us?

Please address all privacy complaints to:

Attention: Squidly

joshua.aarons@sydney.edu.au

If you wish to see access to or correct or update any personal information we hold about you, or to unsubscribe from our direct marketing you can also contact us using the contact details listed above.

