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# Privacy Policy

CleanSpace Holdings Limited  
ACN 150 214 636

Adopted by the Board on 28 September 2020

# Privacy Policy

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## 1 Introduction

CleanSpace Holdings Limited and its subsidiaries (**we, us and our**) understand that your privacy is paramount, and are committed to protecting your privacy.

This policy applies to the collection, storage and use of personal information concerning individuals and formal contractual arrangements with third parties.

CleanSpace may modify or amend this Privacy Policy from time to time. We will display the most recent policy on our website at [cleanspacetechnology.com](https://cleanspacetechnology.com).

Unless you notify us otherwise, we will assume that you have consented to the collection of all information which is provided to us for use in accordance with the Privacy Act 1988 (Cth) ("Privacy Act") and this privacy policy.

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## 2 Collection of personal information

Personal information is information or an opinion about an individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in material form or not.

CleanSpace only collects information that is necessary to perform its business activities. The Company does not wish to collect information which is 'sensitive information' as defined under the Privacy Act, being information or opinions about the individual's health, political affiliations, sexual preferences, religious beliefs, racial or ethnic origin or other such private information. If by law the Company is required to do so, the Company will seek consent to collect that particular information.

We may collect personal information directly from a person or related bodies corporate, partners, distributors, consultants, agencies, government agencies, credit reporting agencies, event organisers and other service providers when you:

- apply for potential employment and grant authority for reference checks;
- have contractual dealings;
- visit our website; or
- contact us by any method, such as telephone, email, post, facsimile or in person,

or otherwise as notified to you from time to time.

The personal information you provide to us may vary depending on the nature of your interaction with us, but may for example include your name, contact details and any communications you send to us.

There may be occasions when we collect information about you from a third party. In such instances, we will determine whether we would have been entitled to collect such information from you and to the extent we would not have been entitled to do so, we will destroy or de-identify such information as soon as reasonably practicable.

Where possible, we will allow you to interact with us anonymously or using a pseudonym. For example, if you contact us with a general enquiry, we will not ask for your name unless we need it to adequately handle your enquiry.

However, for most of our activities we usually need your name and contact information.

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### 3 Our website

Our web servers may automatically collect information when you visit our CleanSpace websites, including:

- your IP address;
- the date and time of your visit;
- the parts of our website you access during your visit;
- your actions on our website; and
- the browser you are using.

We and our third-party providers use cookies, clear GIFs/pixel tags, JavaScript, local storage, log files, and other mechanisms to automatically collect and record information about your usage and browsing activities on the CleanSpace Web Site and across third party sites or online services. We may combine this information with other information we collect about users.

Cookies are small text files placed on your mobile device or computer by our websites which automatically collect information about you without you providing that information to us directly. Most browsers are set by default to accept cookies. However, if you do not wish to receive any cookies you may set your browser to either prompt you whether you wish to accept cookies on a particular site, or by default reject cookies.

Please note that rejecting cookies may mean that some or all of the functions on our website will not be available to you.

Sometimes our websites contain links to other websites. When you access a website other than our websites, we are not responsible for the privacy practices of that site. We recommend that you review the privacy policies of each website you visit.

When you create an account and profile on the CleanSpace Web Site, we collect your name, contact information, and other information you provide, such as topics that you know about or find interesting.

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### 4 Using your personal information

The personal information that we collect is generally used to provide products or services to you, and, if you use our website, to track your usage, to evaluate performance of our website, and to keep track of your account settings. Information collected by us may also be used for the following purposes:

- (i) to provide you with information in relation to the products and services we provide;
- (ii) to respond to your inquiries or suggestions, provide troubleshooting, and for other customer service purposes;

- (iii) for marketing and promotional purposes, such as to send you news and newsletters, special offers, and promotions, or to otherwise contact you about products or information we think may interest you, including information about third party products and services;
- (iv) to improve the quality of or to develop new products or services;
- (v) to communicate with you about your use of the CleanSpace Web Site;
- (vi) to tailor the content and information that we may send or display to you in the CleanSpace Web Site, to suggest content, to offer location customization, and personalized help and instructions, and to otherwise personalize your experiences while using the CleanSpace Web Site;
- (vii) to improve the quality of your visit to the CleanSpace Website;
- (viii) to comply with legal obligations, as part of our general business operations, and for other business administration purposes; or
- (ix) where we believe necessary to investigate, prevent or take action regarding suspected illegal activities, suspected fraud, situations involving potential threats to the safety of any person or violations of our Terms of Service or this Privacy Policy.

You may opt out of receiving marketing information by notifying us accordingly, or by using any unsubscribe facility we provide for that purpose. If you opt out of receiving emails about recommendations or other information we think may interest you, we may still send you transactional e-mails about your account or any services you have requested or received from us.

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## 5 Sharing your personal information

We may disclose your personal information to other related entities within our corporate group for our own business purposes. Some of our related entities are located overseas, including in the United States and Singapore.

We may share your information with third party service providers who use this information to perform services for us, such as payment processors, hosting providers, auditors, advisors, consultants, customer service and support providers.

Where information is shared with these third parties, we will take all reasonable steps to ensure that third parties observe the confidential nature of such information and are prohibited from using any or all of this information beyond what is necessary to assist us.

We may disclose your personal information to a third party referred to above that is located outside Australia, however due to circumstances which change from time to time it is not practicable for us to specify the countries in which such third parties are located.

We may disclose or transfer information, including personal information, as part of any merger, sale, and transfer of our assets, acquisition or restructuring of all or part of our business, bankruptcy, or similar event.

We may disclose information where we believe it necessary to respond to claims asserted against us or, comply with legal process (e.g., subpoenas or warrants), enforce or administer our agreements and terms, for fraud prevention, risk assessment, investigation, and protect the rights, property or safety of CleanSpace, its users, or others.

We may share aggregate statistics, metrics and other reports about the performance of their ads or content in the CleanSpace Web Site such as the number of unique user views, demographics about

the users who saw their ads or content, conversion rates, and date and time information. We do not share IP addresses or personal information. We may also allow our advertisers or publishers to use Pixels on the CleanSpace Web Site in order to collect information about the performance of their ads or content.

We may share aggregated or de-identified information with third parties for research, marketing, analytics and other purposes, provided such information does not identify a particular individual.

We may also disclose your personal information as permitted or required by law.

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## 6 Accessing and correcting your personal information

We will, on request, provide you with access to the information we hold about you, including for the purpose of correcting or updating that information, unless there is an exception to such disclosure which applies under relevant privacy legislation. If you require access to your personal information, please contact our Company Secretary as described in section 9 below. You may be required to put your request in writing for security reasons.

For most requests, your information will be provided free of charge, however, we may charge a reasonable fee if your request requires a substantial effort on our part.

If we refuse to provide you with access to the information, we will provide you with reasons for the refusal and inform you of any exceptions relied upon under the APPs (unless it would be unreasonable to do so).

We take reasonable steps to ensure that your personal information is accurate, complete, and up-to-date whenever we collect or use it. If the personal information we hold about you is inaccurate, incomplete, irrelevant or out-of-date, please contact us and we will take reasonable steps to either correct this information, or if necessary, discuss alternative action with you.

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## 7 Protecting your personal information

We are committed to protecting your personal information. We take appropriate security measures to protect your personal information from misuse, interference or loss, and from unauthorised access, modification or disclosure. This includes the use of technologies and processes such as access control procedures, network firewalls, and physical security to protect the privacy of your personal information.

However, no website or Internet transmission is completely secure. We urge you to take steps to keep your personal information safe, such as choosing a strong password and keeping it private, as well as logging out of your user account, and closing your web browser when finished using the CleanSpace Web Site on a shared or unsecured device.

If we become aware that we have collected personal information from a child under the relevant age without parental consent, we take steps to delete that information.

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## 8 Change of policy

We may modify or amend this Privacy Policy from time to time. We will keep the current version of this Privacy Policy on our website at [cleanspacetechnology.com](https://cleanspacetechnology.com). This Privacy Policy will be included in all induction materials provided to employees, contractors and consultants.

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## 9 Contact information

If you have any queries or complaints with regards to our collection, use or management of your personal information, or about this policy, please contact our Company Secretary at:

E: [Secretary@cleanspacetechnology.com](mailto:Secretary@cleanspacetechnology.com)

T: +61 2 8436 4000

If you make a complaint, we will endeavour to respond to it as soon as possible. If you are dissatisfied with our response, you have the right to make a complaint to the Office of the Australian Information Commissioner by phoning 1300 363 992 or by email at [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au).