

Privacy Policy

1. About this policy

This Privacy Policy (Policy) sets out the information handling practices of the Thylation Group of Companies (Thylation). This Policy does not cover personal information about our current or past employees. This Policy does include applicants for a position with us, contractors and consultants.

“Personal information” refers to information or an opinion about an identified or reasonably identifiable individual, regardless of whether it is recorded in material form or whether it is true or false.

“Sensitive information” is a sub-category of personal information and includes details about race, ethnicity, political affiliations, membership of professional trades and associations, and health and biometric information. We will refer to sensitive information when we refer specifically to this type of information. Where we mention personal information, this automatically includes sensitive information.

We handle personal information in accordance with the *Privacy Act 1988* (Cth) including the Australian Privacy Principles (Privacy Act) and this Policy.

2. Collection of personal information

We use the information we collect from you to deliver various products and services, including but not limited to:

- confirming the identity of individuals;
- contacting individuals;
- conducting research and development;
- providing products and services;
- entering into relationships with partners to financially support Thylation's activities;
- providing information and services through our websites as well as via email, online advertisements and social media;
- undertaking activities, either directly or through our service providers, such as surveys, website analytics and email campaign management.

We collect personal information for the purposes and aims stated in this Policy.

We collect personal information from our members, non-members, customers, third parties, service providers, suppliers, contractors, consultants, and sponsors/partners. The nature of such personal information varies, and it is collected in different ways. More information about this is provided below.

In some instances, you may choose to provide information about another person, for example, the name and contact details of someone who might be interested in becoming a member. If you provide personal information about someone other than yourself to Thylation, you must make sure that they have agreed to you providing their personal information to us. We also ask that you make them aware of this Policy, for example by giving them a link to it.

Thylation has special protections in place to keep the personal information that we collect safe and secure. These special protections include:

- training our staff to keep your personal information safe and secure;
- putting contractual arrangements in place to protect your personal information when we disclose it;
- implementing separate storage and technical restrictions on who can access the personal information;
- taking reasonable steps to destroy or de-identify your personal information when we no longer require it (for example for membership or legal purposes).

If Thylation does not collect your personal information, we may not be able to provide some or all of our products and services to you. You may also find that you do not experience the full extent of our information and products and services, including our websites.

Membership information

To become a member of Thylation Limited t/a Thylation Foundation, you must complete various membership related applications. Such applications can request a range of personal information, including name and contact details, gender, and career history.

In some instances, you may start a membership application online without completing it. The information that is provided on the incomplete application is also collected by Thylation and is used to contact you about becoming a member.

We also collect date of birth information on some of these applications to enable us to uniquely identify you and assess what products and services may be most suitable and of interest to you.

Customer information

To become a customer of Thylation Commercial, you must share your business contact details. This can include personal information such as your name and contact details, and your company address and business number. You might also share your home address and phone number for product delivery purposes, or if you work from home.

In some instances, you may start a contact application online without completing it. The information that is provided on the incomplete application is also collected by Thylation and is used to contact you about becoming a customer.

We also collect date of birth information on some of these applications to enable us to uniquely identify you and assess what products and services may be most suitable and of interest to you.

Survey information

From time to time, Thylation or its service providers may collect personal information from survey participants. Such personal information may include name and contact details, gender, career history, location, membership of Thylation Foundation or other conservation associations or charities, opinions on trends and issues, and specific industries in which you are involved.

Specific surveys may collect other types of personal information, however participation in a survey is voluntary, so if you do not want to provide the requested information you do not have to.

We will only use the personal information collected through surveys for analytical purposes, to assist with improvement or development of our products and services, and in relation to external studies conducted in partnership with unrelated third parties for research purposes.

Non-member and non-customer information

To expand Thylation's membership and customer base, we collect information about prospective members and customers from existing members and customers who might refer a prospective member or customer to Thylation.

Information about prospective members and customers will primarily include their name and contact details.

Images and recordings

Thylation collects images (video or photographs) and sound recordings of its products, which may either be taken by Thylation, or by a service provider, or by a customer.

At the time of attending an event (e.g. workshop or product training), you will be given the option to indicate if you do not want Thylation to collect and/or use any images or recordings of you. You may also contact Thylation directly to express your preference.

Job applicants, contractors and consultants

If you are an applicant for employment with Thylation,, we will collect your name, contact details, educational and work history, and other information that you provide to us as part of the application process. Your information will not be used for any other purpose.

If you are a contractor or consultant, we will collect the name, contact details, and position of any individuals with whom we need to communicate in relation to goods or services that you provide.

Our websites

When you visit our websites or download, access or register to use our websites, (which may also include the use of any of our products or services), we may collect your personal information such as your name, address, email address, phone number, date of birth, username, password and other information. We may also collect information automatically, including technical information related to your mobile device, your device's unique identifier, your mobile network information, the type of mobile browser you use and information about the way you use our products, services or apps.

Depending on the particular product or service you use, and only after you have agreed to such collection, for example at the time of first signing up, we may also collect information stored on your device, including contact information, location information or other digital content.

When you access our websites including 'Felixer Management System' via your mobile device, our service provider collects username details to authenticate access to User-only content. We do not review or use this information for any purpose beyond authentication with our Felixer User database.

We or our service providers use web analytics to collect a range of information about your interactions with our websites. Web analytics software collects the information using a number of techniques including cookies (both first and third party cookies) and Java Script. We also use web analytics to collect information from the browsers of those who use our websites.

The information we collect using web analytics software includes your IP (Intellectual Property) address, domain name, date and time of visit, the pages visited, and time spent on

each page, whether you have visited the site before and what site referred you to the web page. We use this information to evaluate the effectiveness of our websites and the level of interest in particular pages or Thylation's campaigns.

We use a variety of technology to enhance your experience, including Google Analytics, behavioural marketing tools to build and score a profile which influences what marketing may be of interest to you, and tools to maintain contact with members, leads and prospects.

Our websites may contain links to other sites. We are not responsible for the privacy practices or policies of those sites, and we suggest that you review the privacy policies of those other sites.

Emails

If you send us an email, that particular address will be recorded automatically by our e-mail messaging system for the purpose of replying to your e-mail.

However, if you are a member, we will normally use the e-mail address you provided in your membership application/renewal, unless you ask us to use a different e-mail address.

Social media

We participate in social media, for example, through our LinkedIn and Facebook pages. If we think it is relevant to the quality of service that Thylation provides or its objectives, we sometimes note the nature of any topic discussed by a particular individual and their name. Thylation may then contact the individual in a separate forum to further discuss the topic. In some instances, Thylation may keep a note of the discussion, including details about what was discussed and any interesting insights provided by the individual, and details about when the discussion occurred.

Social media services also handle your personal information for their own purposes. These sites have their own privacy policies. We are not responsible for the privacy practices or policies of those sites, and we suggest that you review their privacy policies.

3. Use of personal information

We will not use your personal information for any purpose which you would not reasonably expect unless it is consistent with the Privacy Act. If we think that you may not expect us to use your information for a purpose which is directly related to the purpose of our collection of that information, we will ask for consent before we use it for that purpose.

Personal information from membership, training course and product sales

We use such personal information to:

- manage the membership of Thylation Foundation, and customer participation in certain programs, including the Felixer User Training portal which is mandatory for obtaining Felixer poison cartridges; and including the Felixer Management System, which is mandatory for reporting Felixer data;
- administer and meet member or customer requirements for the particular product, service, course or program;
 - To help us improve a particular service, event or program, or product;
 - To identify and analyse your activities and interests to better meet member and customer needs and attract new members and customers;
 - To enable us to target marketing communications to you;

- To enable Thylation to further its mission of enabling conservation through innovation.

Research findings

We use such information to:

- identify your needs and ensure our products and services meet those needs;
- identify prospective members, and customers and provide marketing approaches designed to recruit new members and customers;

Images and recordings

We occasionally use sound and image recordings of our workshops and product demonstrations to promote Thylation (including if Thylation collaborates with a trusted third party), and to enable us to improve our products and services, and for educational purposes (such as training).

Data aggregation

In some circumstances, we collect your personal information and de-identify it for the purpose of aggregating data. We primarily do this to better understand certain trends among our membership and customers, to plan and execute marketing campaigns, to improve our products and services, or create new ones. We may also do so for internal reporting purposes.

We will not aggregate data for a purpose which you would not reasonably expect, unless it is consistent with the Privacy Act. If we have any doubt about whether you would expect us to aggregate your personal information for a certain purpose, we will seek consent from you.

Job applicants, contractors and consultants

If you are an applicant for employment with Thylation, we will use your personal information to process your application for a position with us. Your information will not be used for any other purpose.

If you are a contractor or consultant, we will use the personal information of any employees that you have provided to us to contact you in relation to any goods or services that you provide to us.

Communications

We may send various types of communications to you, depending on your indicated preference.

Our advertising and marketing material, content, information and communications (Marketing Materials) is sent to you if our records indicate that you would like information about our products and services which may be of personal and/or professional benefit to you, whether you are a member, non-member or customer. These products or services may extend beyond those provided by Thylation, and may include offers from third parties that we or our providers consider may of interest to you.

Our membership-related material, content, information and communications (Membership-Related Material) is sent to members. By signing up for membership and providing Thylation Foundation with your contact details as part of that membership application, you consent to receiving Membership-Related Material. Membership-Related Material includes membership

welcome letters, newsletters, or any other communication which does not involve promotion of any products or services, including those of Thylation.

We may send any of these Marketing Materials or Membership-Related Materials by mail, telephone, email, SMS or other electronic methods, such as through social media or targeted advertising. If you indicate a preference for a method of communication, we will try to use that method where it is practical for us to do so.

When you access our websites, we may display customised marketing material to you based on data stored in your cookies. Your opt-out options may be different for this kind of marketing material. Service providers we use, including remarketers, may also display our marketing material on other parties' websites that you visit. The display of that marketing material may be based on your prior visits to our websites and other internet activity. We may also use data supplied by service providers to improve our marketing material and advertising campaigns.

We give you the chance to opt-out of receiving Marketing Material and Membership-Related Materials in our communications with you, such as forms, letters or emails, or you can opt out by contacting us using the details provided in this Policy or by logging-in to your user account.

Unless you have opted out, we will continue to provide:

- Marketing Material and Membership-Related Material to members for 12 months after they have ceased to be members; and
- Marketing Material to non-members for 12 months after their last interaction with us.

4. Disclosure of your personal information

We only disclose your personal information for the purposes outlined in this Policy or for purposes that are directly related to those purposes that you would reasonably expect, or when we are legally required to.

Events, courses or workshops

We disclose the name, title, organisation of event participants to:

- any Presenters under strict conditions to enable them to carry out their role in relation to an event, for example, to organise table lists, or facilitate introductions;
- sponsors and potential sponsors to enable them to assess whether or not to sponsor an event;
- providers of special member offers from time to time under strict conditions; and
- event attendees in the form of a list showing the names of all the people who have registered to attend the event, unless at the time you registered for that event that you do not want your name included in such a list.

We also disclose the name, title, organisation of any Presenters to Thylation members and the public generally by way of our website to promote the particular event.

Publications

We disclose information about members to other members via Thylation publications, for example the Newsletter.

Affiliated partners of Thylation

We disclose personal information to partners affiliated with Thylation, including but not limited to our Directors, committees and our training partners. These partners work on behalf of Thylation to carry out specific responsibilities which Thylation delegates to them.

Our affiliated partners are only permitted to use your personal information for the purposes for which they received the personal information, which we specify when we delegate responsibility to them.

Third party contractors and partners

We disclose personal information to contracted service providers, who assist us with a number of our products and services including technology development, data processing, contact centre, legal, accounting, applicant verification and assessment, business consulting, auditing, archival, delivery, banking, payments, market research, content production and mailing but only for the purpose of fulfilling those services.

Service providers may use cookies and other technologies to conduct certain activity, which then allows us to supply our services to you.

Other disclosures

We may also disclose your personal information:

- to other members of Thylation where you have consented to us sharing that information - for example, if a member requests your contact details, we will call or email you to ask for your consent before sharing your details;
- to employers and recruitment companies provided you have expressly consented (for example by email or phone) to such disclosure, and then only to the extent that you have consented.

Where authorised or required by law

As authorised by the Privacy Act we disclose personal information in connection with law enforcement activities by enforcement bodies, for example, Australian Securities and Investments Commission investigations or other investigations into suspected fraud or unlawful activity.

Thylation Limited is required by Part 2C.1 of the *Corporations Act 2001* (Cth) (Corporations Act) to collect and record certain information in our Member Register and allow an individual to inspect Thylation Limited's member register and view current and past members' names and addresses. Inspection is free for members, but a fee may be payable by non-members. We will provide a copy of the Register if you make a valid application under the Corporations Act to us and pay the relevant fee. However, the Corporations Act and Chapter 2C of the Corporations Regulations 2001 prohibit the individual from using the information gained to contact, or send material to, members, and from using it for other prescribed purposes and penalties apply for such misuse of such information.

We may also disclose personal information to Australian and overseas regulatory authorities or other organisations to assist them with business licensing or due diligence purposes.

Overseas disclosure

From time to time, we may send your personal information overseas. Some of our service providers are located in other countries including the US, UK and Singapore. Where we use a service provider that hosts personal information in other countries, we take steps that are reasonable in the circumstances to ensure that the host does not breach the Australian Privacy Principles. The steps we take include:

- assessing whether the service provider is located in a country that has at least equivalent privacy protections to those in Australia;
- adding provisions in our contract with the service provider that require them to protect the personal information they hold; and
- when choosing a service provider, including in our considerations the privacy law or scheme (if any) that applies in the country in which the service provider operates.

5. Security of personal information

We regularly assess the risks of misuse, interference, loss, unauthorised access, modification or disclosure of personal information and ensure that we have adequate measures, including policies, procedures and technology, to address those risks.

6. Retention of personal information

We hold personal information for at least 5 years.

7. Access and correction

You have a right to ask for access to the personal information we hold about you. Unless there is a lawful reason not to, we will give you access to it and allow you to correct any incorrect information. We may charge a fee for access (but not correction) and will respond to your request within 30 days.

If you are a member or customer, you can correct personal information we hold about you by logging onto your user account, or by contacting us using the contact details below.

If you are a non-member, you can ask to correct personal information we hold about you by contacting us using the contact details below.

We may ask you to verify your identity if you ask for access to your personal information, or to correct your personal information, to ensure we do not give information to the wrong person.

If we do not give you access to your personal information or refuse to correct it, we will tell you why.

Contact details and concerns

In the event that you have a question or concerns regarding the way in which we handle your personal information, you should contact our General Manager directly at:

General Manager

Thylation Group of Companies, c/o Level 1, 100 Hutt Street, Adelaide SA 5000

Email: felixer@thylation.com

Website: www.thylation.com

We take your privacy concerns seriously. Where you express any concerns that we have interfered with your privacy, we will respond within 48 hours to let you know who will be handling your matter and when you can expect a further response.

If you are unsatisfied with our response you may complain to the Office of the Australian Information Commissioner. Information about how to make a complaint is available at <https://www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacy-complaint-with-us/>

Changing this policy

We may amend this Policy from time to time, including in response to legislative changes, and notify you of any amendments through our publications and by posting an updated version on our websites. Please let us know if you have any concerns about any changes to this privacy policy.

Any amendments to this Policy will be effective immediately once it is posted to our websites. Your use of our websites, products or services following such amendments represents that you agree to be bound by the Policy, as amended.

Suggestions about improving this Policy are welcomed. Please contact us at felixer@thylation.com should you wish to provide any feedback.

This Policy was last amended in May 2021.