

Clevertar Privacy Policy

At Clevertar, we take privacy very seriously. We encourage you to read this Privacy Policy 'Policy' carefully.

The defined terms in this Policy have the same meaning as in our Terms of Use, which you should read together with this Policy. By accessing our Hosted Services, You consent to the terms of this Policy and agree to be bound by it and our Terms of Use.

Clevertar collects your personal information

Clevertar is a provider of an online avatar providing a digital 'personal assistant' named Anna to help you and your clients with daily task and event reminders, and online interactions between the care provider, families and the client.

This service involves the storage of data about a company or individual. That data can include personal information. "Personal information" is information about an identifiable individual, and may include information such as the individual's name, email address, telephone number and personal address.

Clevertar may collect personal information directly from you when you:

- register to use the Hosted Service,
- use the Hosted Service, and
- contact the Clevertar support team

You can always choose not to provide your personal information to Clevertar, but it may mean that we are unable to provide you with the service.

Clevertar may receive personal information from you about others

Through your use of the Hosted Service, Clevertar may also collect information from you about someone else. If you provide Clevertar with personal information about someone else, you must ensure that you are authorised to disclose that information to Clevertar and that, without Clevertar taking any further steps required by applicable data protection or privacy laws, Clevertar may collect, use and disclose such information for the purposes described in this Policy.

This means that you must take reasonable steps to ensure the individual concerned is aware of and/or consents to the various matters detailed in this Policy, including the fact that their personal information is being collected, the purposes for which that information is being collected, the intended recipients of that information, the individual's right to obtain access to that information, Clevertar's identity, and how to contact Clevertar.

Where requested to do so by Clevertar, You must also assist Clevertar with any requests by the individual to access or update the personal information you have collected from them and entered into the Hosted Service.

Clevertar collects, holds, and uses Your personal information for limited purposes

Clevertar collects your personal information so that we can provide you with the Hosted Service and any related services you may request. In doing so, Clevertar may use the personal information we have collected from you for purposes related to the Hosted Services including to:

- verify Your identity,
- administer the Hosted Service,
- notify you of new or changed services offered in relation to the Hosted Service,
- carry out marketing or training relating to the Hosted Service,
- assist with the resolution of technical support issues or other issues relating to the Hosted Service,
- comply with laws and regulations in applicable jurisdictions, and
- communicate with you.

By using the Hosted Service, you consent to your personal information being collected, held and used in this way and for any other use you authorise. Clevertar will only use your personal information for the purposes described in this Policy or with your express permission.

It is your responsibility to keep your password to the Hosted Service safe. You should notify us as soon as possible if you become aware of any misuse of your password, and immediately change your password contact us to have a password reset for you.

Clevertar can aggregate your non-personally identifiable data

By using the Hosted Service, you agree that Clevertar can access, aggregate and use non-personally identifiable data Clevertar has collected from you. This data will in no way identify you or any other individual.

Clevertar may use this aggregated non-personally identifiable data to:

- assist us to better understand how our customers are using the Hosted Service through quantifiable measurements,
- provide our customers with further information regarding the uses and benefits of the Hosted Service,
- enhance business productivity, including by creating useful business insights from that aggregated data and allowing you to benchmark your business' performance against that aggregated data, and
- otherwise to improve the Hosted Service.

Clevertar holds your personal information on servers located in Australia

All Data, including personal and non-personal information, that is entered into the Hosted Service by you, or automatically imported on your instruction, is transferred to Clevertar's servers as a function of transmission across the

Internet. By using the Hosted Service, You consent to your personal information being transferred to our servers as set out in this Policy.

Currently our servers are located in Australia by Microsoft Azure, Inc. and your personal information will be routed through, and stored on, those servers as part of the Hosted Service. If the location of our servers change in the future, we will update this Policy. You should review our Policy regularly to keep informed of any updates.

By providing your personal information to Clevertar you consent to Clevertar storing your personal information on servers hosted in Australia. While your personal information will be stored on servers located in 'the cloud', it will remain within Clevertar's effective control at all times. The server host's role is to provide a hosting and storage service to Clevertar, and we've taken steps to ensure that our server hosts do not have access to, and use the necessary level of protection for, your personal information.

If you do not want your personal information to be transferred to a server located in Australia you should not provide Clevertar with your personal information or use the Hosted Service.

Clevertar takes steps to protect your personal information

Clevertar is committed to protecting the security of your personal information and we take all reasonable precautions to protect it from unauthorized access, modification or disclosure. Your personal information is stored on secure servers that have SSL Certificates and has been verified by MSIT Machine Auth C A 2.

However, the Internet is not in itself a secure environment and we cannot give an absolute assurance that your information will be secure at all times. Transmission of personal information over the Internet is at your own risk and you should only enter, or instruct the entering of, personal information to the Hosted Service within a secure environment.

We will advise you at the first reasonable opportunity upon discovering or being advised of a security breach where your personal information is lost, stolen, accessed, used, disclosed, copied, modified, or disposed of by any unauthorised persons or in any unauthorised manner.

Clevertar only discloses your Personal Information in limited circumstances

Clevertar will only disclose the personal information you have provided to us to entities outside Clevertar if it is necessary and appropriate to facilitate the purpose for which your personal information was collected pursuant to this Policy, including the provision of the Hosted Service.

Clevertar will not otherwise disclose your personal information to a third party unless you have provided your express consent. However, you should be aware that Clevertar may be required to disclose your personal information without your consent in order to comply with any court orders, subpoenas, or other legal process or investigation including by tax authorities, if such disclosure is required by law. Where possible and appropriate, we will notify you if we are required by law to disclose your personal information.

The third parties who host our servers do not control, and are not permitted to access or use your personal information except for the limited purpose of storing the information.

You may request access to your personal information

It is your responsibility to ensure that the personal information you provide to us is accurate, complete and up-to-date. You may request access to the information we hold about you, or request that we update or correct any personal information we hold about you, by setting out your request in writing and sending it to us at info@clevertar.com.

Clevertar will process your request as soon as reasonably practicable, provided we are not otherwise prevented from doing so on legal grounds. If we are unable to meet your request, we will let you know why. For example, it may be necessary for us to deny your request if it would have an unreasonable impact on the privacy or affairs of other individuals, or if it is not reasonable and practicable for us to process your request in the manner you have requested. In some circumstances, it may be necessary for us to seek to arrange access to your personal information through a mutually agreed intermediary (for example, the Subscriber).

We'll only keep your personal information for as long as we require it for the purposes of providing you with the Hosted Service. However, we may also be required to keep some of your personal information for specified periods of time, for example under certain laws relating to corporations, health, or aged care legislation.

Clevertar uses cookies

In providing the Hosted Service, Clevertar utilises "cookies". A cookie is a small text file that is stored on your computer for record-keeping purposes. A cookie does not identify you personally or contain any other information about you but it does identify your computer.

We and some of our affiliates and third-party service providers may use a combination of "persistent cookies" (cookies that remain on your hard drive for an extended period of time) and "session ID cookies" (cookies that expire when you close your browser) on the Website to, for example, track overall site usage, and track and report on your use and interaction with ad impressions and ad services.

You can set your browser to notify you when you receive a cookie so that you will have an opportunity to either accept or reject it in each instance. However, you should note that refusing cookies may have a negative impact on the functionality and usability of the Website.

You are responsible for transfer of your data to third-party applications

The Hosted Service may allow you, the Subscriber within the relevant subscription to the Hosted Service to transfer data, including your personal information, electronically to and from third-party applications. Clevertar has no control over, and takes no responsibility for, the privacy practices or content of these applications. You are responsible for checking the privacy policy of any such applications so that you can be informed of how they will handle personal information.

Clevertar has a privacy complaints process

If you wish to complain about how we have handled your personal information, please provide our Privacy Officer with full details of your complaint and any supporting documentation:

- by e-mail info@clevertar.com, or
- by letter to The Privacy Officer, Clevertar Pty Ltd , Level 9A, 144 North Terrace, Adelaide 5000, Australia

Our Privacy Officer will endeavour to:

- provide an initial response to your query or complaint within 10 business days, and
- investigate and attempt to resolve your query or complaint within 30 business days or such longer period as is necessary and notified to you by our Privacy Officer.

This policy may be updated from time to time

Clevertar reserves the right to change this Policy at any time, and any amended Policy is effective upon posting to this Website. Clevertar will make every effort to communicate any significant changes to You via email or notification via the Hosted Service. Your continued use of the Hosted Service will be deemed acceptance of any amended Policy.

Last updated: December 2015