



Kitney Privacy Policy

Privacy is important to us and we think it is important to you too. We have developed this policy to let you know what personal information we collect and how we use it, disclose it and look after it.

When we talk about **'us'** **'our'** or **'we'**, we mean the Kitney group of companies including Kitney Occupational Health and Safety Pty Ltd ABN 15 150 637 595 and Toolkit Solutions Pty Ltd ABN 19 640 355 460.

When we talk about **'you'** or **'yours'**, we mean you as a user of our website, products or services.

When we use the word **'website'**, we mean our main website at www.kitney.com, together with sub-sites (for example www.toolkit.kitney.com), linked website accounts under our control (for example Vimeo) and related blogs, social media platforms, message boards or similar.

As an overview, we collect, hold, use and disclose personal information for the purpose it was supplied for, to let you know about our products and services and/or to provide our services. This means you may receive updates from us or emails about our content or activities from time to time. You can always opt out of our emails and we remove email addresses from our communications list when asked. Our full contact details are at the end of this policy.

Other than as disclosed in this policy we do not sell or give away access to the personal information you provide to us.

This policy applies to:

- your use of our website and covers visitors, regular users and registered or subscribed users of the website;
- your use or purchase of our products; and
- your use of our other services displayed on our website or provided in connection with our business, including consultancy and workshops.

By visiting or using the website or registering to or using our services, you consent to our collection, use and disclosure of your personal information as set out in this policy. If you do not consent to any of the terms of this policy, please do not provide any personal information to us or register for our services.

1 Staying anonymous

You can browse the website anonymously (although our cookies may identify and use your IP address). If you identify yourself to us, at that point we will collect your personal information, for example if you sign up to our newsletter, become a subscriber or purchase products from us.

2 Collecting personal information

At all times we try to only collect the minimum amount of information we need to provide you with information you have requested, market our services or provide our services. For example, if you sign up to our newsletter, we will collect your name and email address so we can email our newsletter to you. If you register and/or purchase a product, we will collect more information about you as we need this information for billing purposes.

The main way we collect personal information about you is when you give it to us, for example:



- when you contact us (for example you might provide your email address and name)
- when you submit information to the website (for example if you post comments on the website)
- when you ask for access to the information we hold about you
- when you use our services or buy products from us

We do not store your credit card details.

3 Indirect collection

Other than as set out in this policy, we aim to only collect information directly from you.

4 On-line Systems Products

If you have purchased documents or modules as part of an On-line Systems Product, we make these documents or document libraries available within your Office 365 Tenancy. You can only access and use the documents if you have a suitable Microsoft Office 365 licence. When you complete the registration process to hold a Microsoft Office 365 licence you will enter into a terms and conditions style agreement with them and be required to comply with their privacy policy. We are not a party to these agreements and are in no way responsible for your relationship with Microsoft or any third-party provider of applications or any consequence arising from it. Their privacy policy may be different from ours and you should carefully read their privacy policy so you understand what they will do with your personal information.

While we are not in any way responsible for integration with your Microsoft Office 365 account, for the purposes of managing our relationships with you and Microsoft, and responding to integration problems with your account and our products, you authorise us to share your name and email address (and username if you have supplied it to us) with Microsoft and you authorise Microsoft to discuss your account, user problems or information about integration with us.

5 Social networking, public forums and links to other websites

We may provide links to other websites, blogs or forums or use social networking services including Twitter, Linked-in and Facebook or provide community notice boards or comments sections on the website (collectively called 'public access areas'). When you communicate with us, or about us, using public access areas, we may collect your personal information. Any information you make available, including your personal information, will be available for public viewing. Even after you terminate your account with us, information you have posted on public access areas may still be viewable. By using public access areas, you agree your use is at your own risk and that we are not responsible for any information that you disclose or communicate or the consequences of that disclosure. For your own safety, we strongly recommend you never disclose personal information on public access areas.

6 Collecting sensitive information

We do not actively collect sensitive information about you from the website. Sensitive information is information about your health, racial or ethnic origin, political opinions, religious beliefs, sexual orientation or criminal history. As part of our consultancy, we may collect sensitive information provided by our clients or directly from their employees. We will take steps to appropriately protect any sensitive information we do receive.



7 Collecting information about minors

We do not collect, store or use personal information of children we know are under the age of 13. The website is not structured in a manner intended to attract children. If you are a parent or guardian and suspect a minor in your care has provided us with their personal information, please contact us and we will investigate.

8 Testimonials

If you provide us with a testimonial, you give us your consent for the use of your name, image (if supplied) and the date to be displayed on the website or in our other marketing material, together with the content of the testimonial that you provide. You agree we may use this information for as long as it remains relevant to our business. You also agree that we may edit your testimonial provided we do not change the intention of what you said (sometimes the testimonials we receive are too long and we only include parts of the testimonial).

9 How we use cookies and other identifiers

We use a range of tools provided by third parties including search engine browsers and our web hosting company, to collect or view website traffic information. These sites have their own privacy policies. We also use cookies and session tools to improve your experience when accessing the website.

Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. Some website features may not function properly without cookies.

The information collected by these tools may include the IP address of the device you are using and information about sites that IP address has come from, the pages accessed on our site and the next site visited. We may use the information to help to track your use of the website, to improve your user experience and the quality of our services. We also use cookies for targeted advertising and remarketing. To find out how to opt out of tailored advertising please check the options available here - <http://www.networkadvertising.org/choices/>.

10 Security and overseas recipients

Your personal information is stored in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure. When we no longer require your personal information for the reason you supplied it (or a longer period if our business structure or any law requires us to keep it for longer), we will take reasonable steps to securely destroy it or de-identify it.

While we take reasonable care, we cannot guarantee the security of your personal information.

For electronic records and communications, we rely on third-party providers including AWS, Microsoft, Google, Sugarsync and Mailchimp to securely process or store the information you have provided to us. Those third-party providers may store their data outside of Australia in a country or countries that do/does not have the same level of privacy protection as under this policy. By using our services, you consent to having your personal information sent overseas and understand that we are not responsible for your personal information once it leaves Australia. We do use appropriate password protection for our systems and aim to use reputable third-party providers.



11 Disclosure – How we use your information

As an overview, the information that we collect about you is used for the purpose it was provided, keeping you up to date with our products or services and providing our services. From time to time we may send you information on behalf of affiliates or business partner of ours however we do not provide them your personal information (although we may provide them aggregated, non-identifiable information about our users). We may also contact you via survey for research or marketing to see what you think of current services or potential new services.

We do not sell, rent or lease our customer information to third parties.

We may give access to the information we hold to:

- appropriate and competent advisors or authorities for the purpose of obtaining advice;
- our trusted third-party service providers (for example, for IT maintenance, other contractors or consultants, statistical analysis, customer support, deliveries), however these providers may only use your information to provide the services we have requested;
- a legitimate buyer, in connection with the sale, transfer or merger of the website or our business (or part of it); or
- other parties agreed with you.

We may also disclose your personal information:

- if we are required to do so by law;
- if, in our absolute discretion, we feel there is a threat to any person or the website;
- to protect or defend our rights or that of our licensor;
- to investigate or enforce our terms of use; or
- in instances of alleged or actual fraud, abuse or illegal conduct.

12 Mandatory data reporting

If we become aware that any of your personal information is lost or accessed or disclosed by us in an unauthorised manner, whether intentionally or unintentionally, we will comply with mandatory data breach notification requirements which require us to notify any affected person within 30 days if the loss or disclosure of data is likely to result in serious harm to that person.

13 Jurisdiction

This site is managed in Australia in accordance with Australian Laws. If you live in a country with laws that do not allow the use of this site, please do not use our site.

14 EU residents

Our services are not currently available to EU residents. If you are a resident of the EU, the website is not designed for your use, please do not provide us with your personal information. We advise that our privacy systems are not GDPR compliant and we request that you do not use our services.



15 Accessing and correcting your personal information

You may request a copy of the information we hold about you, which will only be provided electronically. You have the ability to make a request to amend or correct that information. If we do not agree with your requested change, we will let you know and will keep a copy of your request and our reply with our information.

16 Problems

If you have any concerns about our use of your personal information, please write to us by email at privacy@kitney.com and let us know what the problem is. We will respond to your concerns within 30 days.

If you are not happy with how we manage your concerns, you can contact the Australian Privacy Commission, available at <http://www.oaic.gov.au>.

17 Updates

We will regularly review and periodically update these terms and conditions and privacy policy. Updates will be posted to the website with a new 'last updated' date. Please check back regularly to see if we have made any changes.

18 Our contact details

Website:	www.kitney.com
Entity:	Kitney Occupational Health and Safety Pty Ltd or Toolkit Solutions Pty Ltd
ABN:	15 150 637 595 or 19 640 355 460
e-mail:	privacy@kitney.com

End.