

PRIVACY POLICY

PURPOSE

Cythera is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information. Our business is security so you know we take your privacy seriously.

We have adopted the Australian Privacy Principles¹ (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The NPPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

SCOPE

This policy applies to all personal and/or sensitive information that is collected by Cythera and managed by Cythera staff or third parties.

OBJECTIVE

- Clear and informative communication of Cythera's approach to data privacy

POLICY

Personal information

Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect includes names, addresses, email addresses, phone and facsimile numbers.

This Personal Information is obtained in many ways including interviews, correspondence, by telephone and facsimile, by email, via our website [cythera.com.au](https://www.cythera.com.au), from your website, from media and publications, from other publicly available sources, from cookies and from third parties.

Cythera collects and uses your personal information to allow us to deliver the services you request. Cythera may also use your personal information to contact you to market new offerings from us and help assess our delivery performance of our existing services to you.

We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

What types of Personal Information does Cythera collect and hold?

- ID information such as your name, e-mail and postal addresses, and contact numbers
- Corporate information such as your employer's detail, their ABN and office addresses, and financial history and standing
- IT information like your online addresses, online names, search history and content access records

¹ A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at <https://www.oaic.gov.au/>

Sensitive Information

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

It is Cythera's policy not to collect or store any sensitive information. In rare exceptions, sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law.

GDPR roles

In broader GDPR terminology, note that Cythera may perform multiple roles depending on the services you have engaged:

- The Data Controller is generally our enterprise customers.
- Cythera often is a Processor, that collects, processes and uses data in accordance with the purpose and means of personal data processing agreed with the Data Controller.
- Cythera often is a Joint Controller, along with our managed security vendors, that determines the purpose and means of personal data processing.

Third Party Sharing of Personal Information

Your personal data may be shared with third parties under one or more of the following scenarios:

- When your explicit consent is given.
- To the Data Controller in line with the agreed terms of service.
- With the sub processors included in this policy, subject to the agreed terms of service and with a basis of processing in line with this policy.
- With established affiliates and partners subject to non-disclosure agreements and with a legitimate purpose in line with this privacy policy.
- Where required or authorised by law. IE to government agencies, regulators or law enforcement agencies with a lawful purpose.

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

Cythera specifically provides services using third party suppliers located both in Australia and around the world. These services may include the provision of software that accesses personal information in its ongoing operation, and during the provision of support services.

Cythera does not sell, rent or lease its customer information to third parties. Cythera may contact you, from time to time, on behalf of external business partners about a particular offering that may be of interest to you. In addition, Cythera may share data with trusted partners to help us conduct performance or statistical analysis, send you email or postal mail, and arrange for deliveries.

All such third parties are prohibited from using your personal information except to provide these services to Cythera and are therefore required to maintain the confidentiality of your information.

Security of Personal Information

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

Your rights

Your privacy rights are outlined below. For further details of these rights or to make a request from us related to these rights, please see the Privacy Requests and Contacts section below and contact us accordingly.

- **The right to be informed.** You have the right to be informed about the collection and use of your personal data, when the data is obtained by us.
- **The right to access and amend your data.** You can access your personal data directly when using our services. You can ask us to explain the means of collection, what data is being processed by us, and anyone that we share it with.
- **The right to rectify your data.** You can amend your personal data directly when using our services.
- **The right to data erasure.** You can request we erase your data within 30 days. We will notify you if that cannot be completed or any implications of doing so for using our services.
- **The right to transfer your data.** You can have your data transferred from one system to another safely and securely.
- **The right to restrict your data processing.** You can request we restrict or suppress your personal data to limit its use.
- **The right to opt-in for sensitive data processing:** For any highly sensitive personal data we may collect, we require your explicit consent to opt-in to us processing that data.
- **The right to opt-in by a parent or guardian:** We do not collect data from minors. You are required to be over the age of 16 in order to use our services.
- **The right not to be subject to fully automated decisions:** We do not apply automated processing activities that profile you or make fully automated decisions using your personal data.

These rights are subject to the clauses of the relevant privacy regulations, legal requirements, public interest, and where the above rights may conflict with your use of our services. For any privacy concerns or to request further details of your rights, please see the *Privacy Policy Complaints and Enquiries* section below.

Access to your Personal Information

You may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing.

Cythera will not charge any fee for your access request, but may charge an administrative fee for providing a copy of your Personal Information.

In order to protect your Personal Information we may require identification from you before releasing the requested information.

Maintaining the Quality of your Personal Information

It is an important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date. If you find that the information we

have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

Use of Cookies & Analytics

Cythera uses “cookies” and website analytics to help you personalise your online experience.

The primary purpose of cookies is to provide access convenience. Cythera’s website keeps track of the web sites and pages you visit within it in order to determine which of our services are popular. This data may be used to deliver tailored content and advertising within the Cythera website to you where your behaviour indicates you are interested in a particular subject area. It may also cache information you’ve input previously to speed up subsequent visits.

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Cythera website.

POLICY UPDATES

Cythera may occasionally update this Privacy Policy to reflect company and customer feedback. Cythera encourages you to periodically review this policy to be informed of how Cythera is protecting your information.

PRIVACY POLICY COMPLAINTS AND ENQUIRIES

If you have any queries or complaints about our Privacy Policy please contact us at:

Level 20, 120 Spencer Street, Melbourne VIC 3000

support@cythera.com.au

1300 CYTHERA (1300 298 437)

SUB-PROCESSORS AND LOCATIONS

Microsoft Azure	AUS	Cloud Infrastructure for our email, apps and services
Netsuite	USA	Finance and customer relationship management
Google, Inc	USA	Site analytics (web)
Atlassian	AUS	Support ticketing, internal knowledge base
Slack	USA	Messaging
Rapid7	USA	Managed security vendor
NetSkope	USA	Managed security vendor
Drata	USA	Compliance vendor

TechTent	AUS	Marketing and customer events
Mailgun	USA	Contact form messaging/email

ROLES AND RESPONSIBILITIES

The following information security roles and responsibilities are defined and allocated:

Role	Allocated to
Policy owner and approval. Approving this policy according to company and industry standards and ensuring organisational adherence.	Compliance Manager
Policy editor(s). Creating and maintaining the relevance of this policy and supervising the implementation.	IT Security Committee
Personal Information Administrator. Ensure assets and service usage are managed, recorded and audited according to policy.	Finance Officer

VERSION HISTORY

This policy is reviewed in line with the *Cythera ISMS Framework* - at a minimum annually or when material changes occur in Cythera process, operating environment, or applicable legislation or regulation, whichever comes first. Refer to the Policy of Policy for maintenance instructions.

#	Published	Description	Editor	Owner Approval	Publishing Approval
1.0	August 25, 2023	New ISMS docu set	Mark Terrill, Compliance Manager August 21	Mark Terrill, Compliance Manager August 21	Euan Prentice, Director August 25