

## 1. Overview

**Learning Vault** (collectively, Learning Vault, **we, us, our**) is committed to protecting your privacy. We have prepared this UK Privacy Notice to describe to you our practices regarding Personal Information (as defined below) we collect from users of our services, including our website at <https://www.learningvault.com/>(**Site**) and all other services provided by Learning Vault (**Services**).

Our primary privacy obligations are derived from Australian law. Our Privacy Policy, available on our website, sets out how we comply with these obligations.

Sometimes, we also handle the information of United Kingdom (**UK**) residents or share data with other organisations which do so or provide services to individuals located in the UK. To the extent that we do so for individuals based in the UK or who are citizens of the UK, this UK Privacy Notice for the Data Protection Act 2018 (UK) (**DPA**) and the UK General Data Protection Regulation (**UK GDPR**) applies (collectively, **UK Privacy Law**).

The processing of Personal Information will always be in line with the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) and UK Privacy Law, and in accordance with country-specific data protection regulations and other applicable regulations to Learning Vault.

We have implemented a number of technical and organisational measures to ensure the most complete protection of Personal Information processed through the Services.

## 2. Your rights

UK Privacy Law provide you with eight key rights, being the right to:

- **Be informed:** anyone processing your data must make clear what they are processing, why and who else the data may be passed to.
- **Access:** the right to access what data is held about you.
- **Rectification:** the right to have your data corrected or amended if what is held is incorrect.
- **Erasure:** the right to ask for your personal data to be deleted, also known as the right to be forgotten, if permitted under applicable laws.
- **Restrict processing:** the right to require a temporary halt to the processing of personal data.
- **Data portability:** the right to request for any data supplied by you to us to be provided in a structured, commonly used and machine-readable format.
- **Object:** the right to object to further processing of your data which is inconsistent with the primary purpose for which it was collected.
- **Consider automated decision making and profiling:** the right not to be subject to a decision based solely on automated processing.
- This Privacy Notice sets out, among other things, how you can exercise these rights when dealing with Learning Vault.

## 3. Personal Information we collect

We will only collect Personal Information about you if it is reasonably necessary for our legitimate interests, or where otherwise permitted by UK Privacy Law.

**Personal Information** means any information that allows someone to identify you, including, for example, your name, address, telephone number, e-mail address, as well as any other non-public information about you that is associated with or linked to any of the foregoing data.

### 3.1 Information we collect as you use our services

#### a) Meta Data including Location Data

Some of our Services utilise geolocation to indicate the country and/or state a user is located.

We use location data to help target and tailor the Services to your particular location and jurisdiction. With your consent we may also collect information about your precise location using methods including GPS, wireless networks, cell towers, Wi-Fi access points and other sensors.

b) Log Data

To make our Services more useful to you, our servers (which may be hosted by a third- party service provider) gather some information automatically and store it in log files. This information includes Internet Protocol (**IP**) addresses, browser type and language, Internet service provider (**ISP**), referring and exit websites and applications, operating system, date/time stamp, and clickstream data.

We use this information to understand and analyse trends, to administer the Services, to learn about user behaviour regarding the Services, to improve our product and services, and to gather demographic information about our user base as a whole. Learning Vault may use this information in our marketing and advertising services.

In some of our email messages, we use a “click-through URL” linked to content on our Services. When customers click one of these URLs, they pass through a separate web server before arriving at the destination page on our website. We track this click-through data to help us determine interest in particular topics and measure the effectiveness of our customer communications. If you prefer not to be tracked in this way, you should not click text or graphic links in the email messages.

c) Analytics

We use third party analytics tools to collect information anonymously and report website trends without identifying individual visitors. These tools collect information sent by your device or our Services, including the web pages you visit, add-ons, and other information that assists us in improving the Services.

### 3.2 Information we collect from others

a) Data provided by your employer or educational institution

We may collect your personal information where it is provided by your employer to educational institution to us for the use of our Services. This can include information about you such as when others send messages, documents and information to you. If you are an employee, this might include information that your employer provides to us. We may also collect your information if you are invited to participate in our Services. This may include information such as your name, mailing address, phone number and email address relevant to the Services and contact preferences and is used for the purpose of enabling us to provide our Services to you.

b) Other collection of personal information

We will only collect other personal information about you directly from you, except where it is unreasonable or impracticable to do so.

## 4. How we use your Personal Information

### 4.1 Use of Personal Information

We will only use or disclose your Personal Information for the following purposes:

- To enable you to access and use our Site, associated applications and associated social media platforms.
- To contact and communicate with you.
- For internal record keeping and administrative purposes.
- For analytics, market research and business development, including to operate and improve our Site, associated applications and associated social media platforms.
- For advertising and marketing, including to send you promotional information about our products and services and information about third parties that we consider may be of interest to you.
- To comply with our legal obligations and resolve any disputes that we may have.

We agree to not use or disclose this information for a secondary purpose unless you consent to us doing so, or another exception applies under applicable laws.

For the purposes of the law, some information we hold about you may be considered 'sensitive' as a special category of data and therefore subject to greater protection. In the event that we hold sensitive information about you, we will only disclose or use that information with your consent or if another exception applies under applicable laws.

We will also use or disclose your Personal Information or sensitive information if we are required to do so by law or a court / tribunal order, or if we reasonably believe that the use or disclosure of the information is reasonably necessary for an enforcement related activity or on behalf of an enforcement body, in which case we will make a written note of the use or disclosure or another exception applies under relevant laws.

#### 4.2 Creation of anonymous data

We also collect data in a form that does not, on its own, permit direct association with any specific individual. We may collect, use, transfer, and disclose non-personal information for any purpose.

We may collect information regarding customer activities on our Services including the website. This information is aggregated and used to help us provide more useful information to our customers and to understand which parts of our website, products, and Services are of most interest. Aggregated data is considered non-personal information for the purposes of this Privacy Notice.

We regularly review the anonymised data to ensure that any risk of possible re-identification of individuals is as minimised as possible.

### 5. Disclosure of your Personal Information

We may disclose your Personal Information to third parties for the purposes contained in this Privacy Notice, including without limitation to:

#### a) Service Providers

We may share your Personal Information with service providers to:

- provide you with the Services that we offer you including the website;
- to conduct quality assurance testing;
- to facilitate creation of accounts;
- to provide technical support;
- and/or to provide other services to Learning Vault.
- The service providers (and if necessary, data processors) include:
- information technology service providers such as web host providers and analytical providers;
- advertising and integration partners;
- market research organisations to enable them to measure the effectiveness of our advertising; and
- specialist consultants,

These third party service providers are required not to use your Personal Information other than to provide the services requested by Learning Vault.

#### b) Affiliates and Acquisitions

We may share some or all of your Personal Information with any of our parent companies subsidiaries, joint ventures, or other companies under a common control (**Affiliates**), in which case we will require our Affiliates to honour this Privacy Notice. In the event we are involved in a merger, acquisition or sale of assets we may disclose Personal Information collected by us to such entities that we propose to merge with or be acquired by and will assume the rights and obligations regarding your Personal Information as described in this Privacy Notice. This includes the disclosure of information to our clients where we act as a data processor.

#### c) Third parties including those you choose to share your data with

We may disclose your Personal Information to third parties to whom you expressly ask to us to send the Personal Information or to third parties you choose to send your Personal Information to.

We may also, with your consent or at your direction, disclose your Personal Information to your authorised representatives.

d) Other disclosures

Regardless of any choices you make regarding your Personal Information (as described below), Learning Vault may disclose Personal Information if it believes in good faith that such disclosure is necessary:

- i) in connection with any legal investigation;
- ii) to comply with relevant laws, regulations, enforceable governmental requests or to respond to subpoenas or warrants served on Learning Vault;
- iii) to protect or defend the rights or property of Learning Vault or users of the Services;
- iv) to investigate or assist in preventing any violation or potential violation of the law, this Privacy Notice, or our Terms and Conditions;
- v) to protect the safety of any person or to protect the safety or integrity of our platform including for security reasons;
- vi) detect, prevent or otherwise address fraud, security or technical issues.

We may share your Personal Information with such third parties subject to obligations consistent with this Privacy Notice and any other appropriate confidentiality and security measures, and on the condition that the third parties use your Personal Information only on our behalf and pursuant to our instructions.

We will take reasonable steps to ensure that anyone to whom we disclose your Personal Information respects the confidentiality of the information and abides by UK Privacy Laws or equivalent privacy laws.

We will not share, sell, rent or disclose your Personal Information in ways different from what is disclosed in this Privacy Notice.

Where we act as a data processor the client may also provide us with instructions with regards to disclosure.

## 6. If we can't collect your data

If you do not provide us with the Personal Information described above, some or all of the following may happen:

- we may not be able to provide the requested products or services to you, either to the same standard or at all;
- we may not be able to run the competitions and promotions in a way that benefits you;
- we may not be able to provide you with information about products and services that you may want; or
- we may be unable to tailor the content of our Services to your preferences and your experience of our Services may not be as enjoyable or useful.

## 7. Third party websites

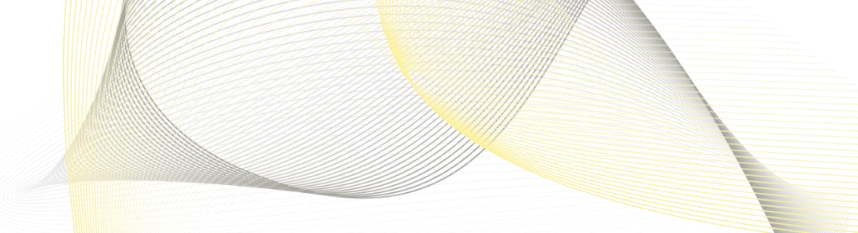
When you click on a link to any other website or location, you will leave our website and go to another site and another entity may collect Personal Information or Anonymous Data from you. We have no control over, do not review, and cannot be responsible for, these outside websites or their content. Please be aware that the terms of this Privacy Notice do not apply to these outside websites or content, or to any collection of data after you click on links to such outside websites.

## 8. Managing your Personal Information

Subject to UK Privacy Law you may request to access the Personal Information we hold about you by contacting us. All requests for access will be processed within a reasonable time.

a) Accessing or rectifying your Personal Information

We may, if required, provide you with tools and account settings to access, correct, delete, or modify the Personal Information you provided to us. You can find out more about how to do this by contacting us. In the event that you are unable to access your account to access or rectify your Personal Information, you may submit a request to us to correct, delete or modify your Personal Information and download the data for you.



b) Deletion

We keep data for as long as it is needed for our operations. If you deactivate and delete your account, your data will no longer be visible on your account. Please keep in mind that third parties may still retain copies of information you have made public through our Services.

If you wish to have us delete your data, please contact us.

c) Object, restrict or withdraw consent

If you have an account on the Services, including the Site, you will be able to view and manage your privacy settings. Alternatively, if you do not have an account, you may manually submit a request to us if you object to any Personal Information being stored, or if you wish to restrict or withdraw any consent given for the collection of your Personal Information.

You may withdraw your consent to the processing of all your Personal Information at any time. If you wish to exercise this right, you may do so by contacting us.

You may withdraw your consent or manage your opt-ins by either viewing your account on the Services or clicking the unsubscribe link at the bottom of any marketing materials we send you.

d) Portability

We may, if required and possible, provide you with the means to download the information you have shared through our services. Please contact us for further information on how this can be arranged.

In certain instances, we may not be required or able to provide you with access to your Personal Information. If this occurs, we will give you reasons for our decision not to provide you with such access to your Personal Information in accordance with the requirements of UK Privacy Law.

There is no application fee for making a request to access your Personal Information. However, we may charge an administrative fee for the provision of information in certain circumstances such as if you make repeated requests for information or where the information is held by a third-party provider.

Where we act as a data processor, we do so on behalf of our client and in accordance with their instructions. This means that should you wish to access, review, correct, transfer, modify or delete any Personal Information we process on behalf of a client you should contact the client with your request.

## 9. Storage and Security of Your Personal Information

Learning Vault stores Personal Information in our Services as well as with some of our- subprocessors in our Sub-processor List.

Learning Vault takes the security of your Personal Information very seriously. We will take all steps reasonable under the circumstances to protect your Personal Information from misuse, interference, loss; and unauthorised access, modification or disclosure. We will process

Personal Information securely and apply and maintain appropriate technical and organisational measure to protect Personal Information.

The transmission and exchange of information is carried out at your own risk. We cannot guarantee the security of any information that you transmit to us or receive from us. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that Personal Information that we collect will not be disclosed in a manner that is inconsistent with this Privacy Notice.

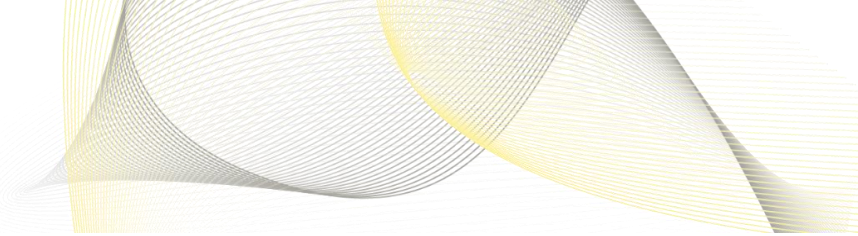
## 10. International Transfer and Disclosure of Personal Information

Where we transfer Personal Information from within to outside of the UK, we ensure an adequate level of protection for the rights of data subjects based on the adequacy of the receiving country's data protection laws.

We may disclose Personal Information to our related bodies corporate and third-party suppliers and service providers located overseas for some of the purposes listed above. We take reasonable steps to ensure that the overseas recipients of your Personal Information do not breach the privacy obligations relating to your Personal Information.

We may disclose your Personal Information to entities located outside of Australia, including the following:





- our related bodies corporate;
- other IT service providers, located in various countries as set out in our Sub-processor List; and
- other third parties located in various foreign countries.

We may disclose your Personal Information to entities within Australia who may store or process your data overseas.

## 11. Notifiable Data Breaches

We take data breaches very seriously.

We will endeavour to meet the 72-hour deadline as imposed by UK Privacy Law, to report any data breach to the supervisory authority or to the Information Commissioner's Office where a data breach occurs that will likely be a risk to you.

Further, where there is likely to be a high risk to your rights, we will endeavour to contact you without undue delay.

We will review every incident and take action to prevent future breaches.

## 12. Automated individual decision-making, including profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you, or similarly significantly affects you, as long as the decision is not necessary for entering into, or the performance of, a contract between us, or is not authorised by UK law to which we are subject and which also lays down suitable measures to safeguard your rights and freedoms and legitimate interests, or is not based on your explicit consent. If you wish to exercise your rights, please contact us.

## 13. Integrity and Retention of Data

We take all reasonable steps to ensure that the Personal Information we collect about you is accurate, up to date and complete. Where we collect that information from you directly, we rely on you to supply accurate information. Learning Vault makes it easy for you to keep your Personal Information accurate, complete, and up to date. Where we use or disclose your Personal Information, we will also ensure that your Personal Information is relevant.

We will retain your Personal Information for the period necessary to fulfil the purposes outlined in this Privacy Notice unless a longer retention period is required or permitted by law.

We may retain your information for fraud prevention or similar purposes.

## 14. Contact Information

Learning Vault welcomes your comments or questions regarding this Privacy Notice.

If you have a question regarding this Privacy Notice or you would like to make a complaint, please contact us by email by using our contact details on the Services or below.

If you reside in the UK the data controller that is responsible for your Personal Information is:

Learning Vault (trading as Credential Vault Ltd)

14650327

Email: [info@learningvault.com](mailto:info@learningvault.com)

Address: Level 4 & 5, Australia Centre,  
Australia House, Melbourne Place,  
London, UK, WC2B 4LG

For individuals based in the UK, we have appointed Law Squared as our Article 27 representative under the UK GDPR. If you want to exercise your rights under the UK GDPR, please contact our Article 27 representative using the contact details below:

Law Squared

c/o Learning Vault Pty Ltd

Email: [learningvault@lawsquared.com](mailto:learningvault@lawsquared.com)

Address: The Stanley Building

7 Pancras Square, King's Cross, London, N1C 4AG

Please add the following subject to all correspondence: Learning Vault

If you wish to raise a concern about our use of your information you have the right to do so with your local supervisory authority for individuals based in the EU or with the Information Commissioner's Office for individuals based in the UK.

## **15. Changes to this Privacy Notice**

This Privacy Notice is subject to occasional revision and Learning Vault reserves the right, at its sole discretion, to modify or replace any part of this Privacy Notice. It is your responsibility to check this Privacy Notice periodically for changes. Continued use of our Services including the website shall indicate your acknowledgement of that it is your responsibility to review the Privacy Notice periodically and become aware of any modifications.

We may amend this Privacy Notice from time to time. Not all changes to our Privacy Notice will require your consent, for example where office security procedures are changed. We will notify you of any change to our information handling policy that requires your consent before being implemented.