



Privacy Policy Statement

This Privacy Policy Statement ("**Privacy Policy**") explains how Risco Ltd and its affiliates (including its related entities) in the Risco Group (collectively, "**Risco**", "**we**", "**us**", or "**our**") collect, use and may disclose under certain circumstances, your information (including *Personally Identifiable Information*, as defined below), and it applies to your use of the website located at the following address: www.riscocloud.com (the "**Website**") and the Services available through the Website (the "**Services**"). Your use of the Website and Services is also governed by the terms of use published in the Website (the "**Terms of Use**"). In the event of any conflict between the terms of this Privacy Policy and the terms of the Terms of Use the terms of Terms of Use shall prevail.

Acceptance of Privacy Policy.

Risco is committed to protecting and respecting your privacy and any information that you may provide us. Please read this Privacy Policy carefully and review it periodically for the latest information about our privacy practices. By accessing and/or using the Website and/or Services or otherwise providing Risco with *Personally Identifiable Information*, you fully agree to the terms of this Privacy Policy.

If you have any additional questions or concerns about this Privacy Policy, please feel free to contact us in the ways set out under "Contact Us and Complaints", below.

The Information We Collect.

When you subscribe for, or use the Website and/or Services we may gather certain information, including the following information:

- *Personally Identifiable Information* – which is information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable, or information that may identify a person, such as, first and last name, email address, nickname (or other user ID), a password, profession or occupation, company name, street address, likes and dislikes.
- *Non-Personally Identifiable Information* – which is information that alone cannot identify you including without limitations information derived from Cookies, Pixel Tags and Web Beacons, but does not include any such information which is *Personally Identifiable Information* under an applicable law.

We collect your *Personally Identifiable Information* to allow us to conduct our business functions, to market and sell our products and services, to communicate with you and for the other purposes set out in this Privacy Policy.

In view of the nature and purpose of the Services, the use of such Services requires the collection, processing and hosting of data that may include also *Personally Identifiable Information*. We shall not use such generated data unless such use is part of the Services functionality and/or purpose or is otherwise permitted under this Privacy Policy. *Personally Identifiable Information* may be collected by us and by our

third party service providers who assist us in operating the Website or providing the Services.

How We Collect the Information.

We may collect *Personally Identifiable Information* that was voluntarily provided by you as part of the registration process for the Website or as part of your interaction with the Website and/or Services or us, for example when:

- you subscribe to the RISCO Cloud service,
- you register on our Website,
- you subscribe to our electronic newsletter,
- you contact us for customer service or other support,
- you submit a job application to us, or
- you or your employer provide that information to us in the course of conducting or administering our relationship with you.

Note that if you contact us, Risco may keep a record of that correspondence.

We may collect *Non-Personally Identifiable Information* automatically when you use the Website and/or Services, such as your Internet Protocol (IP) address, browser type, browser language. This information helps us monitor traffic patterns in order to improve our Services and your use of the Website and Services.

We may also collect *Personally Identifiable Information* about you via third parties (eg if an image or video footage uploaded by our customers who are connected to Risco Cloud contains your image).

Google Analytics.

We use Google Analytics to help analyse how you use our Website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated is used to create reports about the use of our Website. Google will store this information. We will not (and will not allow any third party to) use Google Analytics to track or to collect any *Personally Identifiable Information* of visitors to our Website. We will not associate any data gathered from this Website with any *Personally Identifiable Information* from any source as part of our use of Google Analytics.

If you do not want your Website visit data reported by Google Analytics, you can install the Google Analytics opt-out browser add-on. For more details on installing and uninstalling the add-on, please visit the Google Analytics opt-out page at <https://tools.google.com/dlpage/gaoptout>.

Cookies.

We may use Cookies or similar technology for the collection of information, including *Personally Identifiable Information*. You can learn more about our cookie policy and find out how and for what purpose we use cookies or similar technology at our website at the following address: www.riscocloud.com.

How We Use your Information.

Risco will not sell, rent or lease your *Personally Identifiable Information* to others.

When you use the Website and/or Services, you may provide us with *Personally Identifiable Information* and preferences. We may use it in order to:

- personalize your Services or use of the Website and Services;
- provide you with information, products or services you have requested;
- assist you by providing you with information and support;
- manage and administer any account you may hold with us;
- to process any job application submitted by you;
- if you are an employee or other representative of a customer to which we provide our products and services or a supplier or service provider to us, to conduct or administer our relationship or engagement with you or your employer, to communicate with you about your or your employer's engagement with us and otherwise as specified in this Privacy Policy;
- send communications and administrative emails, such as notices of changes to our Privacy Policy, or Terms of Use.

Where we engage with you multiple times over a short period in relation to the same matter, we may not provide you with a separate notice about privacy each time we engage with you.

You consent to us using your *Personally Identifiable Information* in the above ways and otherwise in accordance with this Privacy Policy.

We may collect and use your *Personally Identifiable Information* for other purposes not listed above. If we do so, we will make it known to you at the time we collect or use your *Personally Identifiable Information*.

If you choose not to provide your *Personally Identifiable Information* to us for the purpose set out in this Privacy Policy, we may not be able to undertake certain activities for you such as providing you with requested information, products or services.

Direct marketing.

If you indicate that you would like to receive marketing communications from us, you consent to us using your *Personally Identifiable Information* to send marketing messages relating to the Website and/or Services and our other products and services that may be of interest to you. You also consent to us sending you such information by means of email, SMS, text or messages through the Risco Service Platform ("**RSP**") or by telephone or post.

You may tell us at any time if you do not wish to receive marketing messages from us by contacting us at the contact details set out under "Contact Us and Complaints", below, or by following any instructions we may include in the message we send to you. For example, a STOP message will appear at the foot of marketing SMS or email messages we send you.

Other Uses.

We may retain, use and disclose your *Personally Identifiable Information* in conformance with applicable laws, to prevent fraud, resolve disputes, troubleshoot

problems, assist with any investigations, enforce the Terms of Use, establishing your use of the Website and/or Services, disclaimers, and limitations of liability governing the use of our Services and take other actions otherwise permitted or required by applicable law. There may be residual *Personally Identifiable Information* that remains within our databases, access logs, and other records.

Disclosing and Sharing of any Information to Outside Parties.

We may share *Personally Identifiable Information* and *Non-Personally Identifiable Information* collected from you or via the Website and/or Services, including within Risco and with third parties, as follows:

(i) to third parties who provide products or services to or through us, such as vendors that assist us in marketing and customer service, credit card processors, integration services, customer support, and cloud hosting services. Such service providers are required by contract to keep confidential and secure the information received on behalf of Risco and may not use it for any purpose other than to carry out the services they are performing for Risco;

(ii) to third parties if we have a good faith belief that access, use, or disclosure of such information is reasonably necessary to:

(a) satisfy applicable law, regulation, legal process or an enforceable governmental request,

(b) enforce the applicable Terms of Use, including investigation of potential violations thereof,

(c) detect, prevent, or otherwise address fraud, security or technical issues, or

(d) protect against harm to the rights, property or safety of Risco, its users or the public as required or permitted by law;

(iv) to any of our subsidiaries, joint ventures, or other companies under common control with us, in which case we will require them to honor this policy. Additionally, in the event we go through a business transition such as a merger, acquisition by another company, or sale of all or a portion of our assets your *Personally and/or Non-Personally Identifiable Information* may be among the assets transferred; and

(v) third parties to whom you ask us to *send Personally and/or Non-Personally Identifiable Information*.

If we transfer your information in accordance with condition (i) and (ii) aforementioned, we will make sure that they agree to apply the same levels of protection as we are required to apply to your information and, where appropriate, to use your information strictly in accordance with our instructions.

Offshore Disclosure of *Personally Identifiable Information* Collected in Australia.

Some of your *Personally Identifiable Information* where collected in Australia may be transferred, stored, processed or used overseas by us or by third party service providers. This may happen if our related entities are overseas, if we outsource certain activities overseas or if transactions, information, services or products have an overseas connection. You consent to the collection, use, storage, and processing of your *Personally Identifiable Information* overseas, including outside of Australia.

In particular, your *Personally Identifiable Information* may be disclosed to third parties which may store your *Personally Identifiable Information* in Israel, Europe including the United Kingdom and Bulgaria, Australia, Brazil and China, and such other countries in which those parties or their, or our, computer systems may be located from time to time, where it may be used for the purposes described in this Privacy Policy, without us being responsible under the Australian *Privacy Act 1988 (Cth)* for such use (or for any breach). In these circumstances, you consent to the collection, use, storage and processing of your *Personally Identifiable Information* in those countries. Where such parties are located outside of Australia, you may have rights to enforce such parties' compliance with applicable data protection laws, but you may not have recourse against those parties under the Australian Privacy Act in relation to how those parties treat your personal information.

Retention of Information.

We will retain information about you after your use of the Website and/or Services is cancelled, for as long as permitted for legal, regulatory, fraud and other financial crime prevention and legitimate business purposes.

Third Party Links. To the extent that the Website provides links or any other information regarding third party applications, products services or websites, we do not control the availability and content of those outside services and resources, and do not control those third parties privacy practices. The *Personally Identifiable Information* you choose to provide to or that is collected by these third parties is not covered by our Privacy Policy and we are not responsible for the collection and use practices of the relevant third parties. We encourage you to review the privacy policy of such third parties before allowing the collection of your *Personally Identifiable Information*.

Access to and Accuracy of your Information. Risco strives to keep your *Personally Identifiable Information* accurately recorded. We have implemented technology, management processes and policies to help maintain data accuracy. You will have reasonable access to *Personally Identifiable Information* that you provide to Risco and the reasonable ability to review and correct it or ask for anonymization, blockage, or deletion, as applicable. However, there may be some legal or administrative reasons to deny access. If we refuse your request to access your *Personally Identifiable Information*, we will provide you with reasons for the refusal where required by applicable law. For the foregoing purposes you can contact us using the contact details at "Contact Us and Complaints", below and follow our instructions on the subject matter.

Keeping your Personal Identifiable Information Secure. Risco takes seriously the trust you place in us. To prevent unauthorized access or disclosure, to maintain data accuracy, and to ensure the appropriate use of the information, Risco utilizes reasonable and appropriate physical, technical, and administrative procedures to safeguard the information we collect and process.

Children's Online Privacy Protection. Protecting the privacy of children and/or minors is very important to us. If you are under age 15, please do not attempt to use the Website and/or Services or provide any *Personally Identifiable Information* about yourself or about children under the age of 15. If we obtain knowledge that a user is under the age of 15, we will take steps to remove that user's *Personally Identifiable Information* from our databases.

Changes to our Privacy Policy. If we modify our Privacy Policy, we will post the revised statement in our Website, with an updated revision date. If we make significant changes to our Privacy Policy that materially alter our privacy practices, we may also notify you by other means, such as sending an email or posting a notice on the RSP prior to the changes taking effect.

Contact Us and Complaints. Risco regularly reviews its compliance with this Privacy Policy. If you:

- have questions or concerns about this Privacy Policy or our information handling processes;
- wish to make a complaint in relation to a breach of your privacy;
- would like to access your *Personally Identifiable Information* held by us;
- would like to opt out of direct marketing; or
- would like to correct your *Personally Identifiable Information* held by us,

please feel free to direct any questions or concerns regarding this Privacy Policy by contacting us at privacy@riscoogroup.com

We will investigate complaints within a reasonable period of time of receiving the complaint and will notify you of the outcome of our investigation.

This Privacy Policy was last modified on: June 19, 2015.