

PRIVACY POLICY

Welcome to classcom.app ("Site"). In this Privacy Policy, "our" "we" or "us" means ClassCom Pty Ltd (ACN 630114573). We are committed to protecting your privacy through compliance with the Privacy Act 1988 (Cth) ("Privacy Act"), the Australian Privacy Principles ("APP") and any related privacy codes. Please read this Privacy Policy ("Policy") carefully as it outlines how we collect, use, disclose and store your personal information.

We may modify this Policy at any time, and by continuing to use our Site, you accept the Policy as it applies and as amended from time to time without prior notification. Your continued use of our Site after any modification to this Policy will constitute your acceptance of such modification.

1. OBJECTIVE

1.1 This Policy will give you an understanding of:

- a. the types of personal information we collect;
- b. why we collect, use and disclose personal information;
- c. how we collect, use, store, disclose and otherwise handle personal information;
- d. how you may access and seek amendment of your personal information;
- e. when we disclose your personal information;
- f. how we deal with data security and third-party links;

- g. how we administer changes to this Policy; and
 - h. how you can contact us to give feedback or submit complaints, and how we deal with any such complaint.
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2. TYPES OF INFORMATION WE COLLECT

2.1 Personal information

We may collect the following personal information from Site visitors and members: the types of personal information we collect:

- a. name;
 - b. mailing or street address;
 - c. telephone number and other contact details; or
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Cubed.LawSquared.co

MELBOURNE

Level 19, 114 William St
Melbourne, VIC 3000
Telephone (03) 9008 5954
melbourne@cubed.lawsquared.co

SYDNEY

Level 13, 50 Carrington St
Sydney, NSW 2000
Telephone (02) 8315 3236
sydney@cubed.lawsquared.co

BRISBANE

Level 6, 140 Creek St
Brisbane, QLD 4000
Telephone (03) 9008 5954
brisbane@cubed.lawsquared.co



- d. any other information relating to you that you provide to us directly or indirectly through our Site, including information you provide through emails, social media, surveys and competition entry forms.

2.2 Cookies and other similar technologies

- a. We may use cookies and similar technologies like pixels, web beacons and local storage to collect and store personal and non-personal information about how you use our Site and our services.
- b. Cookies themselves do not contain any personally identifiable information. They are files that store information on the device on which you are using or accessing our Site. Cookies also retain your details and preferences, so you can easily continue your browsing session upon return to our Site. If you do not want to activate cookies, you can opt-out of receiving them by amending the settings of your internet browser, although you may find that some parts of our Site will consequently have limited functionality and personalisation if you do so.
- c. We may share non-personal information with our affiliated organisations, such as advertisers and/or advertising networks to deliver advertising, and to help measure the effectiveness of an advertising campaign from time to time.
- d. By continuing to use our Site, you consent to our use of cookies and similar technologies. We will handle any information collected by cookies in the same way that we handle other personal information described in this Policy.

2.3 Third-party analytics tools

- a. We may use third-party analytics tools to:

- i. analyse usage trends on our Site, including the tracking and reporting of website traffic, ad conversion tracking, traffic analysis and marketing optimisation; and

- ii. collect this data in aggregate form so that it cannot identify any individual.

- b. Third-party analytics tools collect non-personal information such as how often you visit our Site, the web pages you visit, add-ons, and other analytics data that assists us in improving our services. These tools might include, but are not limited to, Google Analytics, Google AdWords conversion tracking, Google Tag Manager, or Facebook Ads conversion tracking.

- c. We reserve our rights to modify, add or remove any third-party analytics tools. By using our Site, you consent to the processing of any non-personal data these tools will collect in the way and for the purposes described above.

3. WHY WE COLLECT AND USE YOUR PERSONAL INFORMATION

- 3.1 We collect and use your personal information through lawful and fair means so we can perform our business activities and functions. Your personal information is collected and used for the following purposes:

- a. for purposes necessary or incidental to the provision of our services to you;
- b. for internal operations such as record keeping, database management, data analytics or training;
- c. to manage, research and develop our services;
- d. to maintain and develop our business systems and infrastructure, including testing and upgrading of these systems;



- e. to communicate with you, including by email; and/or
- f. to verify your identity, investigate any complaints about or submitted by you, or if we have reason to suspect that you are in breach of any of our terms and conditions.

3.2 We may also use personal information to meet our internal and external audit requirements, information security purposes, and as we otherwise believe to be necessary or appropriate:

- a. under applicable law, which may include laws outside your country of residence;
- b. respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence; and
- c. to protect our rights, privacy, safety, property, or those of other persons.
- d. to manage, research and develop our services;

3.3 With your consent, we may collect personal information about you or from your authorised representatives for the purpose of providing you with our services and marketing other services which we consider may be of interest to you, or obtaining your feedback. For example, we may send you service-related emails (e.g., updates of Terms and Conditions (<https://classcom.app/terms.pdf>), news, technical and security notices, and changes and/or updates to features of our services and this Policy).

3.4 We or our business partners may use your personal information to contact you via phone, SMS and MMS messaging, email or direct mail to promote and market our products and services directly to you. By providing us with your personal information, you consent to us or our business partners contacting you for the purposes of direct

marketing, even if you have registered your home, mobile and/or fax number on the Do Not Call Register.

4. HOW WE COLLECT AND USE YOUR PERSONAL INFORMATION

4.1 We generally collect personal information directly from you when you:

- a. share your information with us on our Site;
- b. communicate with us over email, online chat systems, the phone or in person;
- c. participate in one of our surveys or competitions;
- d. interact with our Site and advertising;
- e. purchase one of our products or services; and
- f. use or access our Site and have set your internet browser to allow us to use cookies to store information from your browser or device.

4.2 We may also collect your personal information from third parties including:

- a. service providers;
- b. credit reporting bodies;
- c. marketing companies;
- d. referrals who may have referred you to us; and
- e. organisations with whom we have an agreement to share information for marketing purposes.

4.3 By providing personal information to us, you consent to us collecting, using, disclosing and storing your personal information in accordance with this Policy. You may choose to deal with us anonymously where it is lawful or practical to do so, such as when you make a general



enquiry about our products and/or services.

4.4 You can choose not to provide us with your personal information. However, this may mean that:

- a. we will not be able to provide you with our products and/or services, or be limited in how we can do so;
- b. we will not be able to interact with you;
- c. we may be unable to process and open an account for you; and/or
- d. we will not be able to properly investigate or resolve any complaint you submit.

4.5 By providing us with your personal information and data, you expressly consent and allow for us to provide, sell and commercialise your data to a third party for which we will obtain a benefit – including third party marketing and affiliate companies.

5. ACCESS TO YOUR PERSONAL INFORMATION

5.1 You may [Contact Us](#) ([classcom.app/contact](#)) to correct or update your personal information. We may need to obtain proof of your identity before implementing your request and may refuse to provide you with certain information where permitted or required by law.

5.2 In certain circumstances, the law permits us to deny you access to your personal information if:

- a. access would be unlawful or pose a serious and imminent threat to an individual's life, health or safety, or a serious threat to public health or public safety;
- b. access would have an unreasonable impact on the privacy of others;

c. the information relates to existing or anticipated legal proceedings and would not be accessible by the process of discovery in those proceedings;

d. access would reveal the intentions of a party in relation to negotiations or prejudice those negotiations; or

e. access may prejudice enforcement activities or a security function.

6. DISCLOSURE AND DESTRUCTION OF PERSONAL INFORMATION

6.1 You may [Contact Us](#) ([classcom.app/contact](#)) to correct or update your personal information. We may need to obtain proof of your identity before implementing your request and may refuse to provide you with certain information where permitted or required by law.

6.2 We may disclose your personal information to the following third parties for the purposes described in this Policy, such as:

- a. our employees, related entities and employees of those entities;
- b. our business partners;
- c. our professional advisers, dealers and agents;
- d. third parties and contractors who provide services to us, including customer enquiries and support services, manufacturing services, shipping and freight services, debt-recovery functions, information technology service providers, marketing and advertising services;
- e. payment systems operators;
- f. our sponsors or promoters of any competition which we conduct;
- g. any third parties authorised by you to receive information held by us; and



- h. government, regulatory and law enforcement agencies as required, authorised or permitted by law.
- i. We destroy personal information which is no longer needed for the purpose for which it was collected, unless we are otherwise required or authorised by law to retain the information for a period of time.

7. DATA SECURITY AND THIRD-PARTY INFORMATION

- 7.1 We hold your personal information in electronic form in secure databases owned and operated by our third-party service providers. We manage the security of your personal information by using SSL encryption.
- 7.2 While we take reasonable steps to ensure your personal information is protected from loss, misuse, unauthorised access, modification or disclosure, security measures over the internet can never be guaranteed. This means that we cannot guarantee the security of your personal information. In the event of a breach, we will attend to the required reporting arrangements. We cannot accept responsibility for the misuse, loss or unauthorised access to, your personal information where the security of information is not within our control.
- 7.3 Our Site may contain links to websites, other apps and social media platforms operated by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless stated otherwise, we are not responsible for the privacy practices of, or any content, on those linked websites, and have no control over or rights in them. The privacy policies that apply to third-party websites may differ substantially from this Policy, so we encourage you to read those privacy policies before using those websites.

- 7.4 If you are visiting the Site from outside Australia, please be aware that you are sending information (including personal information) to Australia where our servers are located. Such information may then be transferred within Australia or back out of Australia to other countries outside of your country of residence, depending on the type of information and how it is stored by us. These countries (including Australia) may not necessarily have data protection laws as comprehensive or protective as those in your country of residence; however, our collection, storage and use of your personal information will at all times continue to be governed by this Privacy Policy.

8. CHANGES TO POLICY

If and when we amend this Policy in any way, we will make all reasonable efforts to bring those changes to the attention of our visitors and members. An updated version of our Policy will be maintained on our Site so that you remain aware of our policies. The updated version will become effective on the date it is posted, which will be listed on the page as the new effective date. We encourage you to check our Site from time to time to view our most current policy.

9. CONTACT US AND OPTING OUT

- 9.1 You can contact us at privacy@classcom.app to:
 - a. request access to information that we have about you;
 - b. correct any information that we have about you; and
 - c. delete information that we have about you.
- 9.2 When you contact us, the personal information which you provide us will only be used for the purpose(s) that you disclose it for, for example, for answering your inquiry or for providing information about our services.



9.3 You may notify us at any time that you do not wish to receive marketing or promotional material by contacting us directly or through the "Unsubscribe" mechanism in our marketing or promotional emails. Our contact details can be found at classcom.app/contact.

10. FEEDBACK AND COMPLAINTS

10.1 We welcome feedback about privacy issues and will attend to all questions and complaints promptly.

10.2 Please contact us at the email address below. If you would like to seek access to any personal information which we hold about you, or if you have any questions or complaints about how we collect, use, disclose, manage or store your personal information, you can contact the department that collected your personal information in the first instance, or write to:

Unit 8, 32 Rushall Street, Fairfield,
Victoria, 3078

We will aim to resolve any complaints within 10 days.

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