

AUSTRALIA AND NEW ZEALAND

Privacy Policy

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We respect your privacy

KEENFINITY Pty Ltd and the Keenfinity Group are committed to protecting your personal information and to dealing fairly and transparently with all personal information collected and held. Ensuring the protection of individuals’ privacy when processing and storing their personal data is inherent in all our business processes. Data protection and Information security are part of our corporate policy. We thank you for your interest in our company and our products.

1. Purpose and Scope

The purpose of this privacy policy is to:

- ▶ clearly communicate the personal information handling practices of KEENFINITY Pty Ltd (hereinafter referred to as “the company”)
- ▶ give individuals a better and more complete understanding of the sort of personal information that the company holds, and the way we handle and safeguard that information
- ▶ let individuals know how they may access, and correct personal information held about them.
- ▶ describe our Privacy Complaints procedure, if you feel we have not complied with this privacy policy or the Privacy Laws.

2. Our privacy Obligations

This privacy policy sets out how we comply with our obligations under the Privacy Laws.

Definitions

In this privacy policy, the following terms have the following meanings:

‘Personal Information’ has the same meaning as defined in the Australian Privacy Act.

Examples of Personal Information include:

- Your name, address, email, phone number, contractual master data, contract accounting, and payment data, which is an expression of a person’s identity.

‘Privacy Laws’ means the Australian Privacy Act 1988 and the New Zealand Privacy Act 1993, as updated or amended from time to time.

3. Collection of personal information

This privacy policy sets out how we comply with our obligations under the Privacy Laws. It is our usual practice to collect Personal Information directly from you or your authorised representative. Sometimes we may collect Personal Information from a third party or a publicly available source, but only if the individual has consented to such a collection or would reasonably expect us to collect their Personal Information in this way.

We only collect Personal Information for purposes which are directly related to our business activities and when it is necessary for such purposes.

3.1 Types of Information we collect

Examples of when we might collect your Personal Information include:

Product offering, sales and support

- ▶ when you request information about products or services or support from the company
- ▶ when you participate in a sales promotion, competition, redemption or cash rebate
- ▶ when you buy products or services directly from the company (e.g., via online shops) when you join one of our workshops or training activities
- ▶ When you subscribe to our e-mail or newsletter lists.

Warranty registration and technical support

- ▶ when you register a product with us for warranty purposes
- ▶ when you contact us for technical support

4. Use and Disclosure

We only use personal information for the purpose for which it was given to us, or for purposes which are directly related to one of our functions or activities, and we do not give it to third parties outside Keenfinity unless one of the following applies:

- ▶ the third party is engaged by the company to assist with conducting the activities for which the information was collected, such as service dealers, retailers, training providers and agents.
- ▶ the individual has consented
- ▶ the individual would reasonably expect, or has been told, that information of that kind is usually passed to those individuals, bodies or agencies
- ▶ it is required or authorised by law, it will prevent or lessen a serious and imminent threat to somebody's life or health

As a leading global supplier of technology and services, the Keenfinity Group operates main data centres in Germany and Singapore. Personal data may be stored in any of these data

centres according to the Australian and New Zealand Privacy Principles. We may also disclose personal information to third parties who have servers in China and Hong Kong.

4.1 Service providers (general)

We involve external service providers with tasks such as sales and marketing services, contract management, payment handling, programming, data hosting, and hotline services. We have chosen those service providers carefully and monitor them on a regular basis, especially regarding their diligent handling of and protection of the data that they store. All service providers are obliged to maintain confidentiality and to comply with the statutory provisions. Service providers may also be other Keenfinity Group companies.

For more information on the key third parties we use, why we use them and how they handle your personal information, please refer to to "[Appendix II](#)"

4.2 Transfer to recipients outside of AU/NZ

We might transfer personal information to recipients located outside AU/NZ. In such cases, prior to the transfer we ensure that either the data recipient provides an appropriate level of data protection or that you have consented to the transfer.

4.3 Browser Log files

Each time you use the internet, your browser is transmitting certain information which we store in so-called log files.

We store log files to determine service disruptions and for security reasons (e.g., to investigate attack attempts) for a period of 7 days and delete them afterwards. Log files which need to be maintained for evidence purposes are excluded from deletion until the respective incident is resolved and may, on a case-by-case basis, be passed on to investigating authorities.

Log files are also used for analysis purposes (without the IP address or without the complete IP address). In log files, the following information is saved:

- IP address (internet protocol address) of the terminal device used to access the online offer
- Internet address of the website from which the online offer is accessed (so-called URL of origin or referrer URL)
- Name of the service provider which was used to access the online offer
- Name of the files or information accessed
- Date and time as well as duration of recalling the data
- Amount of data transferred
- Operating system and information on the internet browser used, including add-ons installed (e.g., Flash Player)
- http status code (e.g., "Request successful" or "File requested not found")

5. Advertising

From time to time, we may send advertising or marketing information to our existing customers. However, we respect the wishes of our customers who do not wish to receive such material from us in the future and have implemented a simple 'opt-out' procedure that can be activated within the promotional email or the marketing communication.

6. Quality

We take steps to ensure that the personal information we collect is accurate, up to date and complete. These steps include maintaining and updating personal information when we are advised by individuals that their personal information has changed, and at other times as necessary. We encourage you to contact us using the contact details below if your records need to be updated.

7. Security

We take steps to protect the personal information we have under our control against loss, unauthorised access, modification or disclosure, and against other misuse. These steps include staff education, password protection, authorisation management for access to electronic information, securing paper documents in locked cabinets and physical access restrictions. Our security measures are, pursuant to technological progress, constantly being improved.

When we send information overseas or use third parties that handle or store data, we take reasonable steps to ensure appropriate data handling and security arrangements are in place. When no longer required, personal information is destroyed in a secure manner.

8. Access

Individuals can request access to personal information we hold about them by contacting us using the contact details in the "Contact" section.

9. Correction

Should any data be incorrect in spite of our efforts for accuracy, we will correct that information at your request.

10. Retention periods

Principally, we store your data for as long as it is necessary to satisfy the notified purpose of collection. In all other cases, your personal information will be safely deleted/destroyed or de-identified (if applicable laws allow).

11. External links

Our online offers may contain links to internet pages of third parties, in particular providers who are not related to us. Upon clicking on the link, we have no influence on the collecting, processing, and use of personal information possibly transmitted by clicking on the link to the third party (such as the IP address or the URL of the site on which the link is located) as the conduct of third parties is naturally beyond our control. Please check the third party website privacy statements before providing your Personal Information. We do not assume responsibility for the processing of personal information by third parties.

12. Cookies

In the context of our online service, cookies and tracking mechanisms may be used. Cookies are small text files that may be stored on your device when visiting our online service. Tracking is possible using different technologies. In particular, we process information using pixel technology and/or during log file analysis.

For information, refer to "[Appendix I](#)"

13. Making a Privacy Complaint

All privacy complaints are managed by the Privacy Officer. Any privacy complaint should be made in writing to the Privacy Officer using the contact details above and should include the following:

- Sufficient contact details to enable us to identify the complainant.
- Clear and succinct details about the nature of the complaint such as what happened, when they became aware of it and who was involved.
- Which Australian Privacy Principle they believe has been breached (if known)
- Outline of the impact the event has had on them.
- Details of what they would like to see happen to resolve their complaint.

The Privacy Officer will acknowledge the complaint as soon as practicable.

After acknowledgement of the complaint, the Privacy Officer will investigate the concerns raised by the complainant. This may involve obtaining further information from the complainant, speaking with relevant staff members, reviewing relevant documents and obtaining technical or legal advice. Once the investigation is completed, the Privacy Officer will write to the complainant to inform them of the outcome of the investigation. accordingly. Please, therefore, notice the current version of our privacy policy, as this is subject to changes.

14. How to contact us

Individuals can obtain further information in relation to this privacy policy, or provide any comments, by contacting us:

Privacy Officer
KEENFINITY Pty Ltd
Suite 1, Level 2, 21 Solent Circuit,
BAULKHAM HILLS NSW 2176 AUSTRALIA
E-mail: dataprotection.keenfinity@keenfinity-group.com

(No commercial emails please)

15. Change of the Privacy Policy

We reserve the right to change our security and data protection measures. In such cases, we will amend our privacy policy

APPENDIX I – Cookies

Usage of Cookies

Categories

We distinguish between cookies that are mandatorily required for the technical functions of the online service and such cookies and tracking mechanisms that are not mandatorily required for the technical function of the online service. It is generally possible to use the online service without any cookies that serve non-technical purposes.

Technically required cookies

By technically required cookies we mean cookies without those the technical provision of the online service cannot be ensured. These include e.g. cookies that store data to ensure smooth reproduction of video or audio footage.

Such cookies will be deleted when you leave the website.

Cookies and tracking mechanisms that are technically not required

We use marketing cookies and tracking mechanisms. We only use such cookies and tracking mechanisms if you have given us your prior consent in each case. With the exception of the cookie that saves the current status of your privacy settings (selection cookie). This cookie is set based on legitimate interest.

General

By using marketing cookies and tracking mechanisms we and our partners are able to show you offerings based on your interests, resulting from an analysis of your user behavior:

Statistics:

By using statistical tools, we measure e.g., the number of your page views.

Conversion tracking:

Our conversion tracking partners place a cookie on your computer (“conversion cookie”) if you accessed our website via an advertisement of the respective partner. Normally these cookies are no longer valid after 30 days. If you visit certain pages of our website and the cookie has not yet expired, we and the relevant conversion partner can recognize that a certain user clicked on the advertisement and thereby was redirected to our website. This can also be done across multiple devices. The information obtained by means of the conversion cookie serves the purpose of compiling conversion statistics and recording the total number of users who clicked on the respective advertisement and were redirected to a website with a conversion tracking tag.

Please note that using the tools might include transfer of your data to recipients outside of Australia / New Zealand where there is no adequate level of data protection pursuant to the GDPR (e.g. the USA). For more details in this respect please refer to the following description of the individual marketing tools:

Marketing Tools

- Name: MyAudience
Provider: Companion GmbH, Carmerstraße 8, 10623 Berlin, Germany
Function: User survey
- Name: Google Analytics
Provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland
Function: Analysis of user behavior (page retrievals, number of visitors and visits, downloads), creation of pseudonymous user profiles based on cross-device information of logged-in Google users (cross-device tracking), enrichment of pseudonymous user data with target group-specific information provided by Google, retargeting, UX testing, conversion tracking, and retargeting in conjunction with Google Ads
- Name: Google Tag Manager
Provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland
Function: Administration of website tags via a user interface, integration of program codes on our websites
- Name: Google Ads
Provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland
Function: Placement of advertisements, remarketing, conversion tracking
Further information is available at: <https://adssettings.google.com/authenticated>

Management of cookies and tracking mechanisms

You can manage your cookie and tracking mechanism settings in the browser and/or our privacy settings.

Note: The settings you have made refer only to the browser used in each case.

Deactivation of all cookies

If you wish to deactivate all cookies, please deactivate cookies in your browser settings. Please note that this may affect the functionality of the website.

Management of your settings with regard to cookies and tracking mechanisms not required technically

When visiting our websites, you will be asked in a cookie layer whether you consent to our using of any marketing cookies or tracking mechanisms, respectively.

In our privacy settings, you may withdraw the consent with effect for the future or grant your consent at a later point in time.

APPENDIX II – Third party privacy notices

Social Sign-in

We give you the option of registering to our online offering using so-called social sign-ins, such as your Apple or Google account, Facebook Connect etc.

In order to register, you will be directed to the relevant social network service's site, where you can sign up using your locally held data. Consequently, your account on the network in question will be linked to our service. When the link is established, given your consent, the information in your public profile held on that network, your e-mail address and the identification tags of your social network-friends will be transmitted to us by the concerned social network service.

Conversely, the social network service used for registration receives your login status, browser information and your IP address, if you declare your consent to this when you visit our website.

If you prefer not to authorize a data transfer between us and social network services, you should use our own registration services to sign up, instead of those on the social networks.

Microsoft Azure (Content Delivery)

In order to optimize the loading times of this website, we use a so-called “Content Delivery Network” (CDN) Services, offered by public cloud from Microsoft, Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA.

The use of the CDN Services represents a predominant legitimate interest within the meaning of article 6 section 1 lit. f GDPR. In context of this processing, personal information is transmitted to the USA. The Transmission is based on European Standard Contractual Clauses in which Microsoft guarantees to comply with the European data protection law for its provided services.

Further information about the privacy policy of Microsoft is available here:

<https://privacy.microsoft.com/en-us/privacystatement>

Google

Google Maps

Some of our pages use the map service Google Maps via an API. The provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

For the use of the functions of Google Maps it is necessary to store your IP address. This information is usually transmitted to a server of Google LLC in the USA and saved there. The provider of this page does not have any influence on this transmission of data.

The use of Google Maps is in the interest of an appealing presentation of our online offers and an easy retrievability of the places listed by us on the website. This represents a predominant legitimate interest on our part within the meaning of article 6 section 1 lit. f GDPR.

Please see the privacy policy of Google for more information on the handling of user data:

<https://www.google.de/intl/de/policies/privacy/>.

Google web fonts

Some of our sites use so-called web fonts of the provider Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland for the uniform display of fonts. When you access a page, your browser loads the required web fonts into your browser cache to display texts and fonts correctly.

For this purpose, the browser you are using has to connect to the servers of Google. This informs Google that our website was accessed via your IP address. The use of Google web fonts is in the interest of a uniform and appealing presentation of our online offers. This represents a predominant legitimate interest on our part within the meaning of article 6 section 1 lit. f GDPR.

Your computer will use a standard font if your browser does not support web fonts.

For more information about Google web fonts please see <https://developers.google.com/fonts/faq> and the privacy policy of Google is <https://www.google.de/intl/de/policies/privacy/>

YouTube

Our online offers use the YouTube video platform, which is operated by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland („YouTube”). YouTube is a platform which allows the playback of audio and video files.

If you access a corresponding page of our offer, the embedded YouTube player will establish a connection to YouTube so that the video or audio file can be transmitted and played. In the process, data are also transmitted to YouTube as the responsible body. We are not responsible for the processing of this data by YouTube.

Further information concerning the extent and purpose of the collected data, on the further processing and utilization of your data by YouTube, on your rights and on your selectable data protection options can be found in the privacy policy of YouTube.