

Lacima Privacy Policy

1. What does this policy cover?

We are committed to maintaining your confidence and trust to protect the personal information you provide to us or which we collect about you via our website www.lacimagroup.com or via any other method. This policy describes how we use and protect your personal information, including but not limited to data from your use of our website.

In this privacy policy, "we", "us", "our" and "Lacima" means either or both Lacima Group Pty Limited ABN 54 097 353 994 of Suite 7.01, Level 7, 56 Pitt Street, Sydney 2000 Australia, as the owner and operator of this website and LG UK Pty Ltd, ABN 40 109 917 393, registered in England and Wales, Branch No: BR007759, Company No: FC 025449 of Suite 7.01, Level 7, 56 Pitt Street, Sydney 2000 Australia and Kemp House, 152 - 160 City Road, EC1V 2NX, United Kingdom.

For the purposes of applicable data protection law (including, the General Data Protection Regulation 2016/ 679 (the "GDPR")), we are joint 'data controllers' of your personal data.

Where applicable, this policy should be read alongside Lacima's Website Terms & Conditions which tell you about the terms on which you may use the website.

Further information about how we collect and process your personal data as well as your rights in relation to your personal data is detailed in our Privacy FAQ annexed to this Policy.

2. What personal data is collected?

We collect personal information that is required for providing software and services to our clients. We also collect personal information for marketing purposes.

Providing personal information is usually optional; however, in order to provide you with access to our services and other resources such as whitepapers and demos, providing certain personal information (e.g., contact information and name, log-in details) is necessary in order to receive these services and resources. You may choose whether or not to receive electronic marketing communications from us and we will only send you such communications where we have the appropriate consents to do so (to the extent required by applicable law).

(i) Personal data collected from you:

We normally collect your personal information directly from you. For example, we collect personal information when you deal with us over the telephone, send us correspondence by letter, fax or email, when you have contact with us in person, when you transact with us, when you fill in forms on the website or on other web based applications we use in our interaction with you, report a problem to us, submit user-generated reviews or ratings to us, and engage in any social media with us. The categories of personal data we collect, include, but not limited to:

- Personal Identification Information: such as, your name, and title;
- Contact Information: such as, email address, mailing address and telephone number;
- Demographic Information: such as, postcode;

- Financial information: such as, credit / debit card numbers; and
- Your marketing preferences, including any consents you have given us.

(ii) Personal data collected about you:

Although we generally collect personal data directly from you, we also collect certain categories of personal data about you from other sources. In particular:

- From Others:
 - Credit checks from credit reporting agencies to enable us to process a transaction
 - From a marketing event organisation
 - Publicly maintained records
 - Financial and / or transaction details from payment providers in order to process a transaction;
- Automatically Collected Information: such as, web browser type and version, operating system, the website you came from and exit to, your IP (Internet Protocol) address, your browser settings, the date and time of your visits, and details regarding your interaction with the website (including which pages or resources on the website you access) or other web based services that we provide you with access to or invite you to use for example for training and webinar purposes;
- Cookies Information: in accordance with the Cookies section below.

3. How is your personal data used, and what is the legal basis for this use?

We process your personal data for the following purposes:

- (i) Contractual Necessity:** As required to establish and fulfil a contract with you, for example: if you make a purchase from us (this will include taking payments); communicating with you and providing customer services.
- (ii) Legitimate Interests:** As required by us to pursue our own legitimate interests, in particular:
- to provide you with information that you have requested from us;
 - to receive services from you or the business which employs you;
 - to undertake marketing activities;
 - undertake research and development for future products and services;
 - facilitating the creation of, and securing, online registered accounts;
 - managing, operating and improving online registered services (incl. enabling you to manage your marketing preferences), and customer journeys on the website;
 - monitoring any online feedback/reviews to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law;
 - we will use data in connection with legal claims which concern our company, group or partners,

compliance, regulatory and investigative purposes as necessary (including disclosure of such information in connection with legal process or litigation);

- creating user / customer insights based on transactional behaviour segments to drive targeted direct marketing;
- creating user / customer insights based on demographic segments to drive targeted email direct marketing and also carrying out market research and surveys;
- communicating with you; and
- investigating and handling any complaints received from you about our website, or our services.

You can obtain further information on the legitimate interests balancing exercises which we have carried out by contacting us using the contact details provided below.

(iii) Legal Compliance: To ensure compliance with applicable laws and legal processes including, but not limited to, use in connection with legal claims, compliance, regulatory, tax, investigative purposes (including disclosure of such information in connection with legal process or litigation and to law enforcement agencies).

(iv) Consent: Subject to the following, we will send you direct marketing by email, SMS, telephone, post, in-App and online about Lacima services which we think may be of interest to you. This will only be sent where you have given your consent to Lacima during the online sign-up process or (where permissible) you have been given an opportunity to opt out. You will be able to opt-out of electronic direct marketing by clicking the unsubscribe link contained in the email itself and, in all other cases, by updating your preferences on the Lacima website or by contacting us directly using the contact details provided below.

4. Minors

Visitors under 16 years of age are not permitted to subscribe to our services use and/or submit their personal information on any of our website or applications. We do not knowingly solicit or collect information from visitors under 16 years of age We encourage parents and guardians to spend time online with their children and to participate and monitor the interactive activities of their children.

5. Who will your personal data be shared with, and where?

We will share your personal data with:

- members of our group of companies being Lacima Group Pty Ltd, LG UK Pty Ltd and Lacima Group (US) Inc;
- third party service providers, who will process it on our behalf for the purposes above. Such third parties include, but are not limited to, "mailing houses", customer service operations, and marketing providers
- government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our own legitimate interests in compliance with applicable laws; and
- purchasers or prospective purchasers of all or part of our assets or our business, and their professional advisers, in connection with the purchase.

Where such information is shared with members of our group of companies or third parties, we will ensure appropriate safeguards are in place to protect your personal data.

6. Cookies

What cookies will be used on the website?

The website uses (first party and third party) cookies (small files placed on website users' hard drive) to distinguish you from other users of the website. This helps us to provide you with a high quality experience when you browse the website and also allows us to improve the website. We use cookies to analyse the flow of information; customize the services, content and advertising; measure promotional effectiveness; and promote trust and safety.

We don't have access to the cookies which third parties place on the website; other than allowing them to be served. Such companies have their own privacy policies which we encourage you to review.

More detail on how businesses use cookies is available here (<http://www.allaboutcookies.org/>).

We offer certain services that are available only through the use of cookies. Generally, there are the following categories of cookies:

(i) Strictly Necessary Cookies

Some cookies are essential for the operation of the website. For example, some cookies allow us to identify registered users and ensure they can access the website. If a registered user opts to disable these cookies, the user may not be able to access all of the content of the website.

(ii) Performance Cookies

Other cookies may be used to analyse how users use the site and to monitor site performance. This allows us to provide a high quality experience by customising the offering and quickly identifying and fixing any issues that arise. For example, performance cookies may be used to keep track of which pages are most popular and to determine why some pages are receiving error messages.

(iii) Targeting Cookies

Targeting cookies are used to serve users with adverts, and to collect information about users' browsing habits and usage of the website in order to make adverts more relevant to users and their interests. We may use remarketing technologies to enable third parties to display relevant and personalised ads to users through their networks. They are also used to limit the number of times users see an advert as well as help measure the effectiveness of an advertising campaign.

(iv) Social Media Cookies

These cookies allow users to share what they've been doing on the website on social media. These cookies are not within our control. Please refer to the respective privacy policies for how their cookies work.

(v) Google Analytics

Google Analytics is a web analysis service provided by Google, Inc. We use Google Analytics to monitor how visitors use our website, to compile reports and to help us improve the website. Please see Google's privacy policy [here](#) for further information on the data Google collects and how it is processed. If you prefer to not have data reported by Google Analytics, you can install the Google Analytics Opt-Out Browser Add-On by following the instructions [here](#).

You may opt out of Google's use of tracking technologies by visiting the Google advertising opt-out page [here](#). For more information on opting out of third party vendors' use of cookies please visit Your Online Choices [here](#).

Users are always free to decline cookies if their browser permits, although doing so may interfere with their use of the website. Please find detailed information on how to disable cookies here (<http://www.allaboutcookies.org/manage-cookies/>).

7. Changes to this policy

We may update this Privacy Policy from time to time. This policy was last updated on 8 September 2020.

Any changes we may make to the policy in the future will be posted on the website and, where appropriate, notified to you by email or otherwise. The changes will be also available in hard copy at our premises.

8. How to contact us

If you wish to gain access to your personal information or make a complaint about a breach of your privacy, or if you have any query on how your personal information is collected or used, please contact our Data Privacy Manager:

Telephone: +61 (02) 8320 7440

Fax: +61 (02) 9475 0984

Mail: Suite 7.01, Level 7, 56 Pitt Street Sydney 2000 Australia

Email: privacy@lacimagroup.com

If you are located in the EEA or UK, you can also contact us at our UK address:

Mail: Kemp House, 152 - 160 City Road, EC1V 2NX, United Kingdom

We will respond to your query or complaint as soon as possible.

9. Unsatisfied with our response to your enquiry?

If you are not satisfied with the manner in which we deal with any privacy complaint you may have, you can refer your complaint to the relevant data protection authority in your country of residence or place of the alleged infringement or to the Federal Privacy Commissioner.

You can contact the Federal Privacy Commissioner by:

Telephone: 1300 363 992

Mail: Director of Complaints, Office of the Federal Privacy Commissioner, GPO Box 5218, SYDNEY
NSW 1042 Australia

If you are located in the UK you can contact the Information Commissioner's Office (www.ico.org.uk)
or other applicable supervisory body in your country.

ANNEX – Privacy FAQs

1. What rights do I have in relation to my personal data?

(i) EU Citizens:

You are entitled to ask us:

- for a copy of your personal data;
- to correct your personal data (if it is inaccurate, incomplete or not up-to-date);
- to 'port' your personal data (i.e. to transfer in a structured, commonly used and machine-readable format, to you or another data controller);
- to erase your personal data; or
- restrict its processing (i.e. processing will temporarily stop (save to the extent that personal data will continue to be stored)).

You also have rights to object to some processing that is based on our legitimate interests, and to processing for direct marketing purposes. Further, where we have asked for your consent to process your data, you are entitled to withdraw this consent as more fully described above.

These rights are limited in some situations – for example, where we can demonstrate that we have a legal requirement to process your personal data. In some instances, this may mean that we are able to retain data even if you withdraw your consent.

Where we require your personal data to comply with legal or contractual obligations, then provision of such data is mandatory: if such data is not provided, then we will not be able to manage our contractual relationship with you, or to meet obligations placed on us.

We hope that we can satisfy any queries you may have about the way we process your personal data. If you have any concerns about how we process your personal data, you can get in touch with our Privacy Officer using the details set out above.

If you have unresolved concerns you also have the right to complain to EU data protection authorities. The relevant data protection authority will be the data protection authority of the country: (i) of your habitual residence; (ii) of your place of work; or (iii) in which you consider the alleged infringement has occurred.

(ii) Non-EU Citizens:

Under the Privacy Act 1988 (Cth), you have the right to seek access to your personal information handled by us. You also have the right to ask us to update or correct your personal information when it is inaccurate, incomplete or out of date.

We will, after receiving your written request, provide you with access to the personal information we

hold about you.

If we refuse to provide you with access to all or any part of your information, we will provide you with written reasons for our refusal and inform you of any exceptions relied upon under the Privacy Act.

If you believe that personal information about you is inaccurate or out of date, or if you have any other queries about access and correction, please contact our Privacy Officer using the contact details set out above.

2. How long will you hold my data?

Where we process personal data for marketing purposes or with your consent, we process the data until you ask us to stop and for a short period after this (to allow us to implement your requests). We will refresh any consents on a regular basis to check you still wish to hear from us. We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely so that we can respect your request in future.

Where we process personal data for site security purposes, we retain it until you request to be removed from our site.

Where we process personal data in connection with performing a contract, we keep the data for the duration of the contract that you have with us plus a minimum of 5 years thereafter.

3. Where will you send my data?

Lacima may transfer (including store) your personal data to countries outside of the European Economic Area (the "EEA") (i.e. all 27 EU Member States plus Iceland, Liechtenstein and Norway) which may not provide the same level of protection as those countries within the EEA, including to Australia.

Where this is the case, and where the transfer is to a country or territory that is not subject to an adequacy decision by the EU Commission, Lacima has taken steps to ensure the personal data is adequately protected (e.g. by using EU Commission-approved standard contractual clauses (which have been implemented pursuant to Article 46 (2) of the GDPR). If you have any questions about the mechanisms we have in place and / or would like to obtain a copy of them, please contact our Data Privacy Manager:

Telephone: +61 (02) 8320 7440

Fax: +61 (02) 9475 0984

Mail: Suite 7.01, Level 7, 56 Pitt Street Sydney 2000 Australia

Email: privacy@lacimagroup.com

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