

This Privacy Policy applies to information collected by BROWCADEMY PTY LTD ABN 23 628 202 611 ('Browcademy', 'we', 'our' and 'us'). Browcademy is committed to protecting the privacy of its customers ('Customers', 'you' and 'your'). We have created the following Privacy Policy to give you an overview of the type of information we collect, how the information is used, stored, and disclosed, and how the information is safeguarded.

Browcademy is bound by the Privacy Act 1988 (Cth) (the Privacy Act) and by other applicable laws which govern privacy. Where appropriate, Browcademy will rely on the employee exemption and the related bodies corporate exemption contained in the Privacy Act with regard to its handling of personal information.

Information is collected from Customers by Browcademy through the use of our website, Thebrowcademy.com (the 'Website'). This Privacy Policy applies only to information collected by Browcademy. By visiting the Website, you accept and acknowledge the practices described in this Privacy Policy.

## 1. What Personal Information does Browcademy Collect and Why?

Browcademy collects your personal information in order to provide you with products of interest to you and to continually improve your shopping experience on the Website. We collect Customers' personal information in order to provide you with, and bill you for, any products you purchase and administer and maintain your account (as applicable). We also collect your details in order to send you information about our products and services. You may choose not to provide us with certain information, but if you do so you may not be able to purchase products, open or hold an account with us or take advantage of the features we offer.

In some cases, Browcademy asks Customers directly for information in order for them to open an account, purchase products, or use our services, and, in other cases, information is collected from third-party sources or automatically as Customers are using the Website. The main types of personal information Browcademy collects and the main purposes for which personal information is collected, used, stored, and disclosed are set out below.

### 1.1 Active Collection

Browcademy collects certain information either voluntarily or as required in order to register an account with Browcademy or use or receive information about certain Browcademy services. This type of information includes:

Order form: Contact information, such as name, mailing address, e-mail address, and phone number

Shipping or transaction information, such as billing address and financial information (credit card number and expiration date) if you choose to purchase products offered for sale on the Website. If we have trouble processing an order, the information is used to contact you.

Demographic information such as postcode.

Information you enter in forms and optional surveys or contests, such as name and e-mail address.

Information is provided in connection with product review forums, discussion groups, bulletin boards, chat rooms, and messaging or other interactive services.

Information provided in e-mail requests and communications.

Health information: While we do not actively collect health information from you, sometimes information about the identity and nature of products you purchase may constitute health information. If you disclose health information during a discussion on any of our interactive communication platforms (including product review forums), that information may also be held by us. In each case, by registering an account with us, using the Website or receiving our products and services, you consent to us collecting, using, and disclosing such information on the terms of this Privacy Policy and our Terms and Conditions including for the purpose of sending you communications about other products serviced based on your purchase history.

Information from other sources: In order to personalise our service by providing better product recommendations or special offers we may think will interest you, we may receive information about you from other sources and add it to our account information. We also sometimes receive updated delivery and address information from our shippers or other sources so that we can correct our records and deliver your next purchase or communication more easily.

## 1.2 Passive Collection

Some information is collected automatically while you are using the Website. It is important to note that Browcademy must store this information in order to ensure its Customers receive optimal service while using Browcademy services. This type of information may include:

(a) Log Files

Logfile information, such as IP addresses, browser type, domain names, number of page views, login frequency, page or section accesses. Log files are used to track member usage and engagement and to gauge the effectiveness of our different services. We use your IP address and other information to help diagnose problems with our server and to administer the Web site.

(b) Cookies:

Browcademy uses cookies, which are electronic pieces of information stored on your computer, to allow us to recognise you when you return to our site and to provide you with customised services and information. If Customers reject a cookie placed by Browcademy, their use of certain Website features will be compromised. For example, upon login to a Customer Account requiring a Customer password, a cookie is set in the browser that links Browcademy software to the proper user's login session. If this cookie is disabled, that aspect of the site will not work.

Browcademy also uses third parties to provide services to you on behalf of Browcademy, and in doing so they must set cookies on the site.

For example, we use a third party to provide web analytic services which allow Browcademy to track website usage statistics and checkout information. Your use of the site is not affected if you reject this cookie. For information on how to have your browser disable cookies or provide a warning before accepting a cookie, please refer to the cookie options in your browser's Options or Preferences menu.

Cookies are used to:

- (i) Store session state information
  - (ii) Authenticate Customers
  - (iii) Help customise content delivery
  - (iv) Provide context-sensitive help
  - (v) Protect Website security and login time-outs
- (c) Clear Gifs (Web Beacons/Web Bugs).

We employ a software technology called clear gifs (also called Web Beacons or Web Bugs), which helps us better manage content on our site by informing us what content is effective. Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of Web users. The main difference between the two is that clear gifs are invisible on the page and are much smaller, about the size of the full-stop at the end of this sentence. Clear gifs are tied to Customers' personally identifiable information. We use clear gifs in our HTML-based e-mails to let us know which e-mails the recipients have opened. This allows us to gauge the effectiveness of our marketing campaigns. If Customers would like to opt out of these e-mails, they should see section 9 below.

Also, clear gifs, which may be set by a third party, are used on pages to track sales, which may result from our Internet advertising campaigns and banner advertisements appearing on other websites. In order to track the effectiveness of our marketing campaigns, aggregate data pertaining to the marketing spend, items purchased, and campaign the customer responded to, is sent to third party servers for the purpose of tracking which sales resulted from specific advertising campaigns and to track conversion sales coming from banner advertisements.

## 2. What Personal Information does Browcademy Collect and Why?

Browcademy endeavors to strictly adhere to federal, state, and local laws including the Privacy Act regarding the preservation and archiving of information collected. In addition to the uses described elsewhere in this Privacy Policy and the purposes described in section 1 above, Browcademy may use the information you provide in the following ways:

(a) To contact you about our products and services or about your use of our Website. For example, Customers will receive a welcome e-mail, e-mail newsletters, and customised content, and they may receive updates when Browcademy has new product features or enhancements or other news to relay to our Customers.

(b) For marketing and promotional purposes. Browcademy does not use individually identifiable health information that may be collected in our product review forums, discussion groups, or other interactive forums for marketing purposes.

(c) To respond to your comments or requests or to request feedback regarding our products or services.

(d) For billing purposes, to facilitate transactions and to fill Customer orders in connection with purchases of products offered by Browcademy.

(e) For the specific purpose for which the information was provided.

(f) To improve the products and services we offer.

(g) As you otherwise direct or authorise.

### 3. How does Browcademy communicate with customers?

Browcademy would like to communicate with its Customers when we have new products or services we feel are of special interest to you. When you register an account with Browcademy, purchase products from Browcademy or otherwise request to receive information about our products and services you will receive the following types of communications:

(a) Special Offers and Updates: Customers and those that sign up to receive marketing information will receive information on products, services, and special deals or coupons. Out of respect for the privacy of our Customers, you have the option to not receive these types of communications. Please see section 9 below.

(b) Customer Service: We communicate with Customers to provide requested services in regard to issues relating to their account, and we reply via e-mail or phone, in accordance with the Customer's wishes.

### 4. What Information is shared with third parties?

Information about our customers is an important part of our business. Browcademy discloses information you provide to us in connection with the purposes described above as follows:

(a) Third-party intermediaries: We will share your information with independent contractors, service providers, and consultants who assist us in our business or in providing Customers with goods or services. Such service providers may include, without limitation, product suppliers in order to fulfill orders, credit card processing, and shipping companies. However, we will only share such personally identifiable information, as we deem necessary for them to carry out their obligations to Browcademy. Third parties are required to only use and/or disclose your personally identifiable information for the purpose for which Browcademy disclosed the information to them, and for no other purpose.

(b) We also share aggregated demographic information with independent contractors, service providers, consultants, advertisers, and other partners.

(c) Browcademy investors receive reports on the number of Customers, items purchased, page views, logins, etc. They do not receive any personally identifiable information.

(d) If you share individually identifiable health information in our product review forums, discussion groups, or through other interactive features, it is not shared with third parties by Browcademy. However, the information you may share in a public forum is considered public information if you choose to share it.

(e) Our personnel, including our employees to the extent that they need to access that personal information in connection with their duties. For more information, see section 5 below.

(f) Business transitions. In the event that Browcademy Australia Pty Ltd goes through a business transition, such as a merger, being acquired by another company, or selling a portion of its assets, Customers' personal information generally is one of the transferred business assets. For more information, see section 11 below.

(g) Brwocademy will also disclose personal information it has collected if necessary to fulfill our service obligations or if we are required to do so by law. We will also disclose personal information if, in our good faith judgment, such action is reasonably necessary to comply with a current judicial proceeding, a court order or legal process served on our Website, to respond to any claims, or to protect the right of Browcademy and its Customers and the public.

(h) Information with your consent. Other than as described above, you will receive notice when information about you may go to third parties, and you will have an opportunity to choose not to share the information.

(i) To related bodies corporate.

The disclosures referred to above may include disclosure to recipients located outside Australia. You acknowledge that by giving consent to the disclosure of your personal information to overseas recipients, Browcademy will not have an obligation under Australian privacy laws to take reasonable steps to ensure that overseas recipients do not breach Australian privacy laws.

## 5. Security

The following outlines different types of security procedures Browcademy has in place to protect the loss, misuse, or alteration of the personal information we collect.

### 5.1 Identification and Authentication

Access to the data is assigned to specific individuals in order to maintain strict control over access. We do not grant general access to data within Browcademy and, except as set forth in this Privacy Policy, access to data is not granted to parties outside Browcademy. We also verify the identity of the persons accessing the data by using a login name and password.

### 5.2 Authorisation and Access Control

Only authorised personnel have access to restricted data. Access to sensitive data such as customer financial information and individually identifiable health information is revoked in a timely manner for employees who change function or resign. Non-disclosure agreements are in place with contractors and third parties having access to sensitive data.

### 5.3 Data Confidentiality

Browcademy uses 128-bit encryption and a security firewall to protect the confidentiality of customer information

### 5.4 Data Integrity and Retention

We implement full database backups to establish data consistency and integrity. We also grant Customers access to their information in accordance with clause 10 below in order to verify that the data is still accurate and has not been modified or corrupted.

Data is stored on our secure server and backed up to tape. Such data is stored to the extent required by federal, state, and local laws. Backups are automated and scheduled using industry-standard net backup software and backup tapes are continuously stored in a secure location off-site.

### 5.5 Data Management and Monitoring

All employees of Browcademy are informed of the company's security policies. Browcademy's new hires are briefed on security and privacy issues and the security policies are also covered in the employee manual. Browcademy departments review security measures at regular department meetings.

Security and privacy threats, operational and technical vulnerabilities have been assessed and countermeasures have been taken to reduce these vulnerabilities. New threats are consistently evaluated and measures are taken to prevent them from occurring at Browcademy. In addition, a security firewall screens access events, and non-valid attempts are denied and logged. More stringent countermeasures are being implemented by Browcademy's administrator on a continuous basis.

## 6. Linking

Our Website may contain links to other websites. Please be aware that Browcademy is not responsible for the privacy practices of such linked websites, including the websites of our partners. We encourage our customers to be aware of this when they leave our Website and to read the privacy policies of each and every Website that collects personally identifiable information. This Privacy Policy applies solely to information collected by Browcademy.

## 7. Surveys and Contests

From time to time, our Website requests information from Customers via surveys or contests. Participation in these surveys or contests is completely voluntary and the user, therefore, may choose whether or not to disclose this information. The requested information typically includes contact information (such as name, email address, and/or shipping address) and demographic information (postcode). Contact information will be used to notify the winners and to award prizes. Anonymous survey information will be used for purposes of monitoring the use of our Website and improving user satisfaction.

## 8. Minors

Browcademy does not sell products for purchase by any persons under the age of 18. We may sell children's products for purchase by adults. If you are under 18, you may use the Website only with the involvement and supervision of a parent or guardian.

## 9. Choice to Unsubscribe/Opt-Out

Browcademy gives Customers the ability to opt-out of receiving future communications from Browcademy by calling us at (02) 9648 9780, emailing us at [info@thebrowcademy.com](mailto:info@thebrowcademy.com) with "Unsubscribe" in the subject line, or by simply clicking the "Unsubscribe" button in any email communication. For example, Customers may wish to opt-out of having their personal information used in order to receive marketing communications that are directly related to Browcademy's products and services.



## 10. Accessing and Correcting Information and Complaints Handling

To assure that the information collected is accurate and up-to-date, Browcademy allows Customers to edit and update their information through our Website. The Website allows Customers to access and correct any inaccuracies in the information submitted online. Customers may also contact us using the details set out in section 12 of this Privacy Policy if they have questions or concerns about the accuracy of their information. We will respond to such communications within a reasonable period of time. Although in most circumstances we will be able to allow you to access or correct the personal information we hold about you, in some circumstances it may not be possible for us to allow you to access or correct some or all of your personal information in the manner in which you have requested. Where this is the case, we will notify you and give you the reasons why (except to the extent it would be unreasonable for us to do so).

If you wish to make a complaint about the way we have handled your personal information (including if you think we have breached the Privacy Act), you may do so by contacting us using the details set out in section 12. If you make a complaint, please include contact details such as your name, address, telephone number, and email address and clearly describe your complaint. We will respond to your complaint within a reasonable period and will endeavor to deal with your complaint in an efficient manner.

## 11. Notification of Changes

Browcademy reserves the right to make changes to our Privacy Policy at any time. If we plan to make significant changes to any of our privacy policies or practices with respect to how we use personally identifiable information, we will post those changes to this Website 30 days before they take effect. Browcademy will post these changes on our Website so our Customers are always aware of what information we collect, how we use it, and under what circumstances if any, we disclose it. Please review our Privacy Policy periodically to see recent changes.

## 12. Addressing Privacy and Security Concerns

If you have any questions or complaints about this Privacy Policy, our practices or your dealings with the Website, or wish to receive a printed version of this Privacy Policy, please contact Customer Services using the following details:

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

Telephone: (02) 9648 9780 during business hours