

## Practera Privacy Policy

We understand that protecting your personal information is important. This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or otherwise collected by us when providing our website, experiential education technology and programs (**Services**) to you. In this Privacy Policy **we, us** or **our** means Intersective Pty Ltd (t/as Practera) ABN 90 145 575 864.

This Privacy Policy takes into account the requirements of the Australian *Privacy Act 1988* (Cth). In addition to Australian laws, individuals located in the European Union or European Economic Area (**EU**) may also have rights under the General Data Protection Regulation 2016/679 and individuals located in the United Kingdom (**UK**) may have rights under the General Data Protection Regulation (EU) 2016/679 (UK GDPR) and the Data Protection Act 2018 (DPA 2018) (together, the **GDPR**). Appendix 1 outlines the details of the additional rights of individuals located in the EU and UK as well as information on how we process the personal information of individuals located in the EU and UK.

### The information we collect

**Personal information:** The types of personal information we may collect about you include:

- **Identity Data** including your first name, last name, job title, your age and/or date of birth and images of you (where you upload a profile picture).
- **Contact Data** including email address, mailing address, street address and/or telephone number.
- **University data** including your education history, the university or other educational provider you are currently enrolled with (if applicable), your university student number and/or your Unique Student Identifier (**USI**) number, if you are using our Services as a student.
- **Financial Data** including your credit card or payment details (including through our third party payment processors, Strip and Xero).
- **Transaction Data** including details about payments to us from you and/or from us to you and other details of products and services you have purchased from us or we have purchased from you.
- **Technical and Usage Data** including internet protocol (IP) address, your login data, your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour, information about your access and use of our website, including through the use of Internet cookies, your communications with our website, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider.

- **Profile Data** including your username and password for our Services, support requests you have made, content you post, send receive and share through our platform such as communication between you and other program participants, text and video assessments, marks and other student education details and information you have shared with our social media platforms.
- **Interaction Data** including information you provide to us when you participate in any interactive features of our Services, including surveys or feedback questionnaires.
- **Marketing and Communications Data** including your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Professional data** including where you are a worker of ours or applying for a role with us, your professional history such as your previous positions and professional experience.
- **Sensitive information** is a sub-set of personal information that is given a higher level of protection. Sensitive information means information relating to your racial or ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation or practices, criminal records, health information or biometric information. While we do not directly request any sensitive information, if you are a student that has been invited to use our Services by a university, a specific Program or the University may use our Services to ask you questions that may include sensitive information, including your ethnicity, which we may have access to. We only collect and use sensitive information as permitted by applicable law.

## How we collect personal information

We collect personal information in a variety of ways, including:

- **Directly:** We collect personal information which you directly provide to us, including when you register for an account or enrol in one of our education programs, through the 'contact us' form on our website or when you request our assistance via email, our online chat or over the telephone.
- **Indirectly:** We may collect personal information which you indirectly provide to us while interacting with us, such as when you use our website, in emails, over the telephone, in your online enquiries, and when we deliver our Services to you.
- **From third parties:** We collect personal information from third parties, such as where a university has invited you to use our Services and details of your use of our website from our analytics and cookie providers and marketing providers. See the "Cookies" section below for more detail on the use of cookies.

## Collection and use of personal information

We have set out below, in a table format, a description of the purposes for which we plan to collect, hold, use and disclose your personal information.

Purpose of use / disclosure	Type of Personal Information
To enable you to access and use our Services, including to provide you with a login and allow you to communicate on our educational platform.	<ul style="list-style-type: none"> <li>● Identity Data</li> <li>● Contact Data</li> <li>● Profile Data</li> </ul>
To contact and communicate with you about our Services including in response to any support requests you lodge with us or other enquiries you make with us.	<ul style="list-style-type: none"> <li>● Identity Data</li> <li>● Contact Data</li> <li>● Profile Data</li> </ul>
To contact and communicate with you about any enquiries you make with us via our website.	<ul style="list-style-type: none"> <li>● Identity Data</li> <li>● Contact Data</li> </ul>
For internal record keeping, administrative, invoicing and billing purposes.	<ul style="list-style-type: none"> <li>● Identity Data</li> <li>● Contact Data</li> <li>● Financial Data</li> <li>● Transaction Data</li> </ul>
For analytics, market research and business development, including to operate and improve our Services, associated applications and associated social media platforms.	<ul style="list-style-type: none"> <li>● Profile Data</li> <li>● Technical and Usage Data</li> </ul>
For advertising and marketing, including to send you promotional information that we consider may be of interest to you.	<ul style="list-style-type: none"> <li>● Identity Data</li> <li>● Contact Data</li> <li>● Technical and Usage Data</li> <li>● Profile Data</li> <li>● Marketing and Communications Data</li> </ul>
To run promotions, competitions and/or offer additional benefits to you.	<ul style="list-style-type: none"> <li>● Identity Data</li> <li>● Contact Data</li> <li>● Profile Data</li> <li>● Interaction Data</li> <li>● Marketing and Communications Data</li> </ul>
If you have applied to work with us; to consider your job application.	<ul style="list-style-type: none"> <li>● Identity Data</li> <li>● Contact Data</li> <li>● Professional Data</li> </ul>
To comply with our legal obligations or if otherwise required or authorised by law.	<ul style="list-style-type: none"> <li>● Any relevant Personal Information</li> </ul>

## Disclosure of personal information to third parties

We may disclose personal information to:

- IT service providers, data storage, web-hosting and server providers such as Google, Amazon Web Services and Hubspot;
- marketing or advertising providers such as [Google, LinkedIn and Facebook];
- professional advisors, bankers, auditors, our insurers and insurance brokers;
- payment systems operators such as Stripe or Xero;
- our existing or potential agents or business partners;
- [sponsors or promoters of any promotions or competition we run;]
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;
- courts, tribunals and regulatory authorities, in the event you fail to pay for services we have provided to you;
- courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights; and
- third parties to collect and process data, such as Google Analytics (To find out how Google uses data when you use third party websites or applications, please see [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/) or any other URL Google may use from time to time), Meta Pixel or other relevant analytics businesses; and
- any other third parties as required or permitted by law, such as where we receive a subpoena.

**Google Analytics:** We may have enabled Google Analytics Advertising Features including [Remarketing Features, Advertising Reporting Features, Demographics and Interest Reports, Store Visits, Google Display Network Impression reporting etc.]. We and third-party vendors may use first-party cookies (such as the Google Analytics cookie) or other first-party identifiers, and third-party cookies (such as Google advertising cookies) or other third-party identifiers together.

You can opt-out of Google Analytics Advertising Features including using a Google Analytics Opt-out Browser add-on found [here](#). To opt-out of personalised ad delivery on the Google content network, please visit Google's Ads Preferences Manager [here](#) or if you wish to opt-out permanently even when all cookies are deleted from your browser you can install their plugin [here](#). To opt out of interest-based ads on mobile devices, please follow these instructions for your mobile device: On android open the Google Settings app on your device and select "ads" to control the settings. On iOS devices with iOS 6 and above use Apple's advertising identifier. To learn more about limiting ad tracking using this identifier, visit the settings menu on your device.

## Overseas disclosure

We store personal information in our data centres in Australia, England and the United States of America. Where we disclose your personal information to the third parties listed above, these third parties may also store, transfer or access personal information outside of where you are based. Where you are accessing our Services from Australia, we will only disclose your personal information overseas in accordance with Australian privacy laws. Where you

are accessing our Services from the EU or UK, refer to the 'Data Transfers' section in Appendix 1 for more information on the transfer of personal information outside of EU or UK.

## Your rights and controlling your personal information

**Your choice:** Please read this Privacy Policy carefully. If you provide personal information to us, you understand we will collect, hold, use and disclose your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us, however, if you do not, it may affect our ability to provide our Services to you and your use of our Services.

**Information from third parties:** If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

**[Anonymity:** Where practicable we will give you the option of not identifying yourself or using a pseudonym in your dealings with us.]

**Restrict and unsubscribe:** To object to processing for direct marketing/unsubscribe from our email database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

**Access:** You may request access to the personal information that we hold about you. An administrative fee may be payable for the provision of such information. Please note, in some situations, we may be legally permitted to withhold access to your personal information.

**Correction:** If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to promptly correct any information found to be inaccurate, out of date, incomplete, irrelevant or misleading. Please note, in some situations, we may be legally permitted to not correct your personal information.

**Complaints:** If you wish to make a complaint, please contact us using the details below and provide us with full details of the complaint. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take in response to your complaint. You also have the right to contact the relevant privacy authority.

## Storage and security

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures, to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

While we are committed to security, we cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk.

## Cookies

Cookies are text files placed in your computer's browser to store your preferences, provide a better user experience, and track patterns with regards to how users use our online Services. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do recognise you when you return to our online Services and allow third parties, such as [Google, LinkedIn and Facebook], to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. If and when you choose to provide our online Services with personal information, this information may be linked to the data stored in the cookie.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our online Services. They include, for example, cookies that enable you to log into secure areas of our online Services, use a shopping cart or make use of online payment services.
- **Analytical/performance cookies.** These are cookies that allow us to recognise and count the number of visitors to our online Services and to see how visitors move around our online Services when they are using them. This helps us to improve the way our online Services work, for example, by ensuring that users find what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our online Services. These cookies enable us to personalise our content for you and remember your preferences (for example, your choice of language or region).
- **Targeting and advertising cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. [We may also share this information with third parties for this purpose.]
- **Social media cookies.** These cookies are used when you share information using a social media sharing button or “like” button on our websites or you link your account or engage with our content on or through a social media site. The social network will record that you have done this. This information may be linked to targeting/advertising activities.

You can find more information about the individual cookies we use, their category, and the purposes for which we use them in the table below:

Cookie	Category	Purpose
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__cf_bm	Necessary	This cookie, set by Cloudflare, is used to support Cloudflare Bot Management. This is beneficial for the website to distinguish between humans and bots
cookieyes-consent	Necessary	CookieYes sets this cookie to remember users' consent preferences so that their preferences are respected on their subsequent visits to this site. It does not collect or store any personal information of the site visitors
wordpress_test_cookie	Necessary	This cookie is used to check if the cookies are enabled on the users' browser
JSESSIONID	Functional	The JSESSIONID cookie is used by New Relic to store a session identifier so that New Relic can monitor session counts for an application
__hssrc	Functional	This cookie is set by Hubspot whenever it changes the session cookie. The __hssrc cookie set to 1 indicates that the user has restarted the browser, and if the cookie does not exist, it is assumed to be a new session
UserMatchHistory	Advertisement	LinkedIn sets this cookie for LinkedIn Ads ID syncing
lang	Functional	LinkedIn sets this cookie to remember a user's language setting
bcookie	Advertisement	LinkedIn sets this cookie from LinkedIn share buttons and ad tags to recognize browser ID
lidc	Functional	LinkedIn sets the lidc cookie to facilitate data center

		selection
bscookie	Advertisement	LinkedIn sets this cookie to store performed actions on the website
__hssc	Functional	HubSpot sets this cookie to keep track of sessions and to determine if HubSpot should increment the session number and timestamps in the __hstc cookie
player	Functional	Vimeo uses this cookie to save the user's preferences when playing embedded videos from Vimeo
_ga	Analytics	The _ga cookie, installed by Google Analytics, calculates visitor, session and campaign data and also keeps track of site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognize unique visitors
_gid	Analytics	Installed by Google Analytics, _gid cookie stores information on how visitors use a website, while also creating an analytics report of the website's performance. Some of the data that are collected include the number of visitors, their source, and the pages they visit anonymously
_gat_UA-78279191-2	Analytics	A variation of the _gat cookie set by Google Analytics and Google Tag Manager to allow website owners to track visitor behaviour and measure site performance. The pattern element in the name contains the unique identity



		number of the account or website it relates to
_ga_5853CGLBP5	Analytics	This cookie is installed by Google Analytics
_hjFirstSeen	Analytics	Hotjar sets this cookie to identify a new user's first session. It stores a true/false value, indicating whether it was the first time Hotjar saw this user
_hjIncludedInSessionSample	Analytics	Hotjar sets this cookie to know whether a user is included in the data sampling defined by the site's daily session limit
_hjIncludedInPageviewSample	Analytics	Hotjar sets this cookie to know whether a user is included in the data sampling defined by the site's pageview limit
_hjAbsoluteSessionInProgress	Analytics	Hotjar sets this cookie to detect the first pageview session of a user. This is a True/False flag set by the cookie
_gat_gtag_UA_78279191_2	Analytics	Set by Google to distinguish users
vuid	Analytics	Vimeo installs this cookie to collect tracking information by setting a unique ID to embed videos to the website
__hstc	Analytics	This is the main cookie set by Hubspot, for tracking visitors. It contains the domain, initial timestamp (first visit), last timestamp (last visit), current timestamp (this visit), and session number (increments for each subsequent session)
hubspotutk	Analytics	HubSpot sets this cookie to keep track of the visitors to the website. This cookie is

		passed to HubSpot on form submission and used when deduplicating contacts
sync_active	Performance	This cookie is set by Vimeo and contains data on the visitor's video-content preferences, so that the website remembers parameters such as preferred volume or video quality
_fbp	Advertisement	This cookie is set by Facebook to display advertisements when either on Facebook or on a digital platform powered by Facebook advertising, after visiting the website
_hjSessionUser	Analytics	Hotjar uses this cookie to store a unique user ID
_hjSession	Analytics	Hotjar uses this cookie to provide functions across pages
Practera	Functional	Practera uses this cookie for logging-in users
wordpress	Analytics	Wordpress uses this cookie to store logged-in users
wordpress_sec	Functional	Wordpress uses this cookie to secure the site and provide protection against hackers, store account details.
wordpress_logged_in	Analytics	Wordpress uses this cookie to store logged-in users
wp-settings-0	Analytics	Wordpress uses this cookie to store user preference
wp-postpass	Functional	Wordpress uses this cookies to password protect a page session
ubpv	Analytics	Unbounce uses this cookie for A/B testing to lock and prevent repeat visits from affecting the

		stats/conversions
ubvs	Analytics	Unbounce uses this cookie serve to track whether your visitor (User) has seen the content before
ubvt	Analytics	Unbounce uses this cookie to track conversions externally
AnalyticsSyncHistory	Analytics	LinkedIn uses this cookie to store information about the time a sync took place
li_gc	Analytics	LinkedIn uses this cookie to store consent of guests regarding the use of cookies for non-essential purposes
outbrain_cid_fetch	Analytics	Outbrain uses this cookie to collect data on the user's navigation and behavior on the website. This is used to compile statistical reports and heatmaps for the website owner

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including strictly necessary cookies) you may not be able to access all or parts of our online Services.

## Links to other websites

Our Services may contain links to other websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

## Amendments

We may, at any time and at our discretion, vary this Privacy Policy by publishing the amended Privacy Policy on our website. We recommend you check our website regularly to ensure you are aware of our current Privacy Policy.

**For any questions or notices, please contact our Privacy Officer at:**

Intersective Pty Ltd (t/as Practera) ABN 90 145 575 864

Email: [contact@practera.com](mailto:contact@practera.com)

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# APPENDIX 1: ADDITIONAL RIGHTS AND INFORMATION FOR INDIVIDUALS LOCATED IN THE EU OR UK

Under the GDPR individuals located in the EU and the UK have extra rights which apply to their personal information. Personal information under the GDPR is often referred to as personal data and is defined as information relating to an identified or identifiable natural person (individual). This Appendix 1 sets out the additional rights we give to individuals located in the EU and UK, as well as information on how we process the personal information of individuals located in the EU and UK. Please read the Privacy Policy above and this Appendix carefully and contact us at the details at the end of the Privacy Policy if you have any questions.

## What personal information is relevant?

This Appendix applies to the personal information set out in the Privacy Policy above. This includes any Sensitive Information also listed in the Privacy Policy above which is known as 'special categories of data' under the GDPR.

## Purposes and legal bases for processing

We collect and process personal information about you only where we have legal bases for doing so under applicable laws. We have set out below, in a table format, a description of all the ways we plan to use your personal information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal information for more than one lawful ground depending on the specific purpose for which we are using your data. Please reach out to us if you need further details about the specific legal ground, we are relying on to process your personal information where more than one ground has been set out in the table below.

Purpose of use / disclosure	Type of Data	Legal Basis for processing
To enable you to access and use our Services, including to provide you with a login and allow you to communicate on our educational platform.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Profile Data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a Contract</li> </ul>
To contact and communicate with you about our Services including in response to any support requests you lodge with us or other enquiries you make with us.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Profile Data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a Contract</li> </ul>
To contact and communicate with you about any enquiries you make with us via our website.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests: to ensure we provide the best client experience we can offer by answering all of your questions.</li> </ul>

Purpose of use / disclosure	Type of Data	Legal Basis for processing
For internal record keeping, administrative, invoicing and billing purposes.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Financial Data</li> <li>• Transaction Data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• To comply with a legal obligation</li> <li>• Legitimate interests: to recover debts due to us and ensure we can notify you about changes to our Licensing / Services Agreement and any other administrative points.</li> </ul>
For analytics, market research and business development, including to operate and improve our Services, associated applications and associated social media platforms.	<ul style="list-style-type: none"> <li>• Profile Data</li> <li>• Technical and Usage Data</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests: to keep our website updated and relevant, to develop our business, improve our Services and to inform our marketing strategy</li> </ul>
For advertising and marketing, including to send you promotional information that we consider may be of interest to you.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Technical and Usage Data</li> <li>• Profile Data</li> <li>• Marketing and Communications Data</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests: to develop our Services and grow our business</li> </ul>
To run promotions, competitions and/or offer additional benefits to you.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Profile Data</li> <li>• Interaction Data</li> <li>• Marketing and Communications Data</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests: to facilitate engagement with our business and grow our business</li> </ul>
If you have applied to work with us; to consider your job application.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Professional Data</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests: to consider your employment application</li> </ul>
To comply with our legal obligations or if otherwise required or authorised by law.	<ul style="list-style-type: none"> <li>• Any relevant Personal Information</li> </ul>	<ul style="list-style-type: none"> <li>• To comply with a legal obligation</li> </ul>

If you have consented to our use of data about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your data because we or a third party have a legitimate interest to

do so, you have the right to object to that use though, in some cases, this may mean no longer using our services. Further information about your rights is available below.

## Data Transfers

The countries to which we send data for the purposes listed above may be less comprehensive than what is offered in the country in which you initially provided the information. Where we transfer your personal information outside of the country where you are based, we will perform those transfers using appropriate safeguards in accordance with the requirements of applicable data protection laws and we will protect the transferred personal information in accordance with this Privacy Policy and Appendix 1. This includes:

- only transferring your personal information to countries that have been deemed by applicable data protection laws to provide an adequate level of protection for personal information; or
- including standard contractual clauses in our agreements with third parties that are overseas.

## Extra rights for EU and UK individuals

You may request details of the personal information that we hold about you and how we are processing it (commonly known as a “data subject request”). You may also have a right in accordance with applicable data protection law to have your personal information rectified or deleted, to restrict our processing of that information, to object to decisions being made based on automated processing where the decision will produce a legal effect or a similarly significant effect on you, to stop unauthorised transfers of your personal information to a third party and, in some circumstances, to have personal information relating to you transferred to you or another organisation.

If you are not happy with how we are processing your personal information, you have the right to make a complaint at any time to the relevant Data Protection Authority based on where you live. We would, however, appreciate the chance to deal with your concerns before you approach the Data Protection Authority, so please contact us in the first instance using the details set out above in our Privacy Policy above.

**For any questions or notices, please contact us using the details set out in above in our Privacy Policy.**