

Tutis System - Privacy Policy

Your privacy is important

This privacy policy outlines how Tutis Operations Pty Ltd ACN 613 180 411 and its associates (we, our or us) collects, uses and discloses personal information in relation to the use of the Tutis training management system (System).

This privacy policy does not apply in respect of the collection, use or disclosure of information contained in employee records held by us where the collection, use or disclosure is directly related to a current or former employment relationship between us and an employee.

The kinds of personal information we collect and hold

We collect and hold personal information about users of our System and persons whose information is uploaded onto the System by users (you).

The kinds of personal information we collect and hold may include your name, email address, residential address and other contact details, correspondence you send to us and information obtained when you use the System (whether via our website or our mobile application), including without limitation:

- your username and password;
- your age and gender;
- your activities on the System, including information that you or others upload or post to the System; and
- your computer's internet protocol address, your mobile device's identifier, standard server log information and other information that we collect through the use of cookies and other similar technologies (see below).

When you use the System, or someone else uses the System and uploads or posts information about you to the System, we may also collect information or an opinion about your racial or ethnic origin, membership of a professional or trade association, criminal record and health information (i.e. sensitive information).

Manner and purpose of collection of personal information

We will generally collect personal information about you by way of collecting information you or others upload onto the System, forms and other documents or information provided to us by you (including online), correspondence you provide to us and discussions with you.

We may also collect personal information about you from third parties. For example, we may collect personal information about you from service providers, related entities, business partners and other third parties, including, without limitation, third parties handling System support enquiries or providing payment processing or marketing services.

We will only collect, hold and use personal information (except sensitive information, see below) for the following purposes unless otherwise required or permitted by law or expressly approved by you:

- to enable us to conduct and improve our business, including to monitor and profile who is accessing and using the System and to make information that you upload onto the System available for viewing by other users of the System;
- to communicate with you, provide customer support to you (including troubleshooting) and/or seek or receive feedback from you regarding the System and any other services or support we provide to you from time to time;
- to carry out marketing initiatives and analysis, including without limitation by providing you with marketing materials in relation to the System, our service offerings from time to time, and our other functions and activities via any medium including mail, telephone and email;
- to manage the payment and recovery of amounts payable to us by you;
- to enforce the terms and conditions that govern the use of the System and to comply with our legal obligations including under applicable legislation and prevent illegal activities; and
- for other purposes which are reasonably necessary in connection with our ordinary functions and activities.

We will only use sensitive information for the purposes for which it was provided or for a purpose directly related to such purpose, unless you agree otherwise or the use of such sensitive information is required or authorised by law.

If we are unable to collect personal information relating to you, we may be unable to provide you with access to the System or otherwise continue our relationship with you.

Disclosure of your personal information

We may disclose personal information about you to the following types of entities if required in connection with the purposes listed above:

- other users of the System;
- our associates and related entities and other third parties who provide us with services in connection with our business or the System generally;
- any industry body, tribunal or court or otherwise in connection with any complaint made by you about us;
- any entity involved in a transfer of all or part of our assets or businesses; and
- other entities with your consent or as permitted or required by law.

Information you upload to the System will be made available to other users of the System (including to users located overseas). By using the System, you consent to the disclosure of your information to others (including to those located overseas).

How we hold personal information

We hold personal information in paper form and electronic form. We have in place steps to protect the information we hold from misuse, interference and loss and from unauthorised access, modification or disclosure. For example, only authorised employees and service providers are provided with access to personal information that has been provided to us for purposes other than uploading such information on the platform (e.g. your System account password).

How to obtain access to your personal information

You may obtain access to personal information which we hold about you by contacting us using the contact details set out below. When you request copies of your personal information held by us we will endeavour to provide you with such personal information as soon as reasonably practicable.

We may charge you a fee in relation to identifying and providing access to your personal information on a per-request basis. We may require you to verify your identity and specify what information you require before completing a request for access. There may be occasions when access to personal information we hold about you is denied. Such occasions would include where release of the information would have an unreasonable impact on the privacy of others.

Accuracy and completeness of personal information

While we will endeavour to ensure that the personal information collected from you is up to date, accurate and complete, we will assume that any personal information provided by you is free from errors and omissions. You may request that we update or vary personal information that we hold about you using the contact details set out below.

How to make a complaint about a breach of your privacy rights

If you are of the view we have breached the Australian Privacy Principles or any related privacy code in dealing with your personal information, you may make a complaint by writing to us using the contact details set out below and we will endeavour to provide you with confirmation as to how we propose to deal with the complaint as soon as reasonably practicable.

If you are not satisfied with our response to your complaint, you may make a complaint to the Office of the Australian Information Commissioner by visiting the following website and following the relevant steps: <http://www.oaic.gov.au/privacy/privacy-complaints>.

Direct marketing communications

From time to time we may use your personal information (except sensitive information) to provide you with marketing materials in relation to the System, our business or our service offerings from time to time. If you would not like to receive direct marketing materials from us you may notify us using the contact details set out below.

Cookies and other website related information

A cookie is a data file that a website transfers to your computer. This enables the website to track the pages you have visited. A cookie only contains information you supply. It cannot read data on your computer. The System may use cookies. You can set your browser to refuse cookies, however, this may mean you are unable to take full advantage of the System.

Our internet server may also automatically record details about any computer used to access the website (such as the IP address, domain name and browser type), the date and time of access, and details of the information downloaded. This information is used for internal statistical purposes and to improve the System. Any other information supplied to us (for example if you send us an email) is treated in accordance with this privacy policy.

Links to external websites

The System may contain hyperlinks to third party websites. This privacy policy does not apply to those websites. We suggest that you consider the privacy policies set out on any website that you access after following a link from the System.

Information about others

Before uploading personal information about another person to the System, or otherwise providing personal information to us, you must obtain that person's consent to do so. If that person is under the age of 15 years, you must obtain the consent of that person's parent or guardian. Unless we are notified otherwise, we will assume that all information about another person that you upload to the System, or otherwise provide to us, has been uploaded or provided to us with that person's consent or, where that person is under the age of 15 years, the consent of that person's parent or guardian.

Information about children

If we become aware that we have obtained information about a person under the age of 15 without the consent of a parent or guardian of that person, we will remove that information from the System and destroy all records of the information that we hold. If you believe that information about a person under the age of 15 years is available on the System, or that we otherwise hold such information, without the consent of a parent or guardian of that person, you can notify us using the contact details set out below.

Variation of policy

We reserve the right to change this privacy policy from time to time to take account of new laws and technology, changes to our functions and activities and to make sure it remains appropriate. The updated policy will be available on our website.

Contact details

Please direct all complaints, requests and queries in relation to your privacy to: Privacy Officer, Level 11/316 Adelaide Street, Brisbane, Queensland, Australia (email address: hello@tutis.com.au).