

ROSY EXPERIENCE PRIVACY POLICY

Rosy Experience Pty Ltd (ABN 20 645 868 864) (“Rosy”, “us”, “our” or “we”) acknowledges and respects the privacy of individuals. We are bound by the Australian *Privacy Act 1988* (Cth) and Australian Privacy Principles (“APPs”), as well as the relevant privacy-related legislation in all other jurisdictions in which we operate including the European Union (“EU”) General Data Protection Regulation (“GDPR”) where we process personal data relating to identifiable EU residents and as applicable, the California Consumer Privacy Act (“CCPA”) where personally identifiable information of California residents is processed. This privacy policy sets out the way in which we will use and manage your personal information.

Unless stated by you to the contrary, you acknowledge and consent to the use or disclosure of your personal information including your name, address, email address and other information you provide to us, in circumstances that are:

- Set out in the privacy policy;
- Clearly explained to you at the time when the information is collected from you;
- Permitted under the Australian privacy legislation and APPs or any other relevant legislation.

Collection of Information

We will collect personal information from you when you knowingly provide it to us. Depending on the nature of your correspondence with us, we will request personal information from you such as:

- Your name, address, e-mail address, contact phone number, credit card details, username and password when you create a user account;
- Payment and billing information necessary to complete transactions;
- Your name and e-mail address when you make an enquiry;
- Your email address when you opt-in to receive marketing communications from us.

We may also collect sensitive information (such as information about your wellbeing) in the course of providing our services to you (for example, information regarding your diet, sleep or exercise through our questionnaire via our customer portal). We will only collect such information from you with your consent and if the information is reasonably necessary to provide our services.

Use of Your Information

The personal information that we collect from you may be used for reasonable business purposes. We may use your personal information in the following ways:

- Facilitate the creation and management of your user account on the Rosy platform;
- Provide you with the service you have requested;
- Provide you with program progress tracking;
- Enable us to develop and customize our services to better meet your needs and preference;
- Provide administrative support; and
- Respond to your enquiries related to our services.

Your information may also be used for the following purposes:

- Promotional and marketing purposes, where you explicitly consent to such use;
- Insights and analytical purposes through Google Analytics, including but not limited to acquisition channels, tracking sources of traffic, customer behaviour (e.g. page views, time spent on different pages, bounce rate etc.), conversion rates and audience demographics;
- Purposes relating to enhancing the performance of the website; and
- Any other customer support purposes.

For any of the above, we may contact you by electronic or other means.

You can choose not to provide certain personal information, but then you may be precluded from taking advantage of some of our services. Please note that, collection of your personal information is fundamental if you are making an on-line purchase as we may need to contact you on issues relating directly to your order.

Disclosure to Third Parties

We may disclose your information to selected third parties who assist us in delivering our services. These third parties will have access to your personal information to the extent needed to perform their functions but may not use it for other purposes.

Your information may also be disclosed to other third parties if we are required or authorised by law to disclose the information or if we have your consent to share the information. Under no circumstances will your information be sold for commercial purposes.

Your information may also be shared with our related bodies corporate who will at all times treat your information in a manner consistent with this privacy policy.

Disclosure to Overseas Recipients

We may transfer or store your personal information outside of Australia. We will only do so as permitted by Australian privacy laws and as described in this privacy policy. We will take reasonable steps to protect your personal information and abide by the Australian privacy laws where overseas disclosure is required.

For EU residents, this means that your data will almost certainly be transferred outside of the European Economic Area ("EEA") when it is provided to us. Where your personal data is transferred by us to anyone else, we will ensure that this is only done with appropriate safeguards in place to protect personal data in compliance with applicable data protection legislation. Such measures may include (without limitation) transferring the data (i) to a third party in a country that has been identified as providing adequate protection for EEA data, or (ii) to a third party which has entered into standard contractual clauses adopted or approved by the European Commission, or (iii) to a third party in the US which is Privacy Shield certified.

Access, Accuracy and Other Rights

We will take reasonable steps to ensure that the personal information we collect is accurate, complete and up-to-date.

You can access and request correction of any personal information concerning you at any time. You may also request that we delete/erase your personal information at any time

(right to be forgotten). Any such requests should be made directly by contacting us at the details set out below.

If the GDPR applies, EU residents also have the following additional rights:

- The right to obtain a copy of their personal data on request;
- The right to transfer their personal data to another person or entity (right of data portability);
- The right to restrict or object to processing, or withdraw consent to processing; and
- The right to lodge a complaint with a supervisory authority (see below).

If the CCPA applies, California residents also have the following additional rights:

- The right to obtain a copy of their personal data on request including additional details regarding how information is used, collected, shared or sold in the preceding 12 months;
- The right to opt out of sale of their personal data, if applicable; and
- The right to not be discriminated against for exercising these rights.

Storage and Security

We utilise serverless cloud computing to process and store your personal information. We will take reasonable steps to protect personal information from misuse, loss and unauthorised access, modification or disclosure and ensure that the cloud infrastructure follows the best practices to mitigate the Open Source Foundation for Application Security Program's (OWASP) Top 10 Web Application Security Risks.

Except if your information is required to be retained by law, we will hold your information for as long as we require it, or until you notify us that you no longer wish to hold your account, or EU or California residents, until you request that we erase your data.

Payments are processed by Stripe, Inc ("Stripe"). Personal information will be provided to Stripe only to the extent necessary for the purposes of processing your payments. Any information provided to Stripe will be handled in accordance with Stripe's privacy policy at <https://stripe.com/au/privacy>.

Links to Other Sites

We may provide links to other sites. If you use these links, you will leave our website and we are not responsible for any of these sites, their content or their usage of your personal information. We advise that you check the privacy policies of the entities operating those sites.

Click Stream Data

Each time you visit our website our server collects some anonymous information, known as click-stream data, including the type of browser and system you are using; the address of the site you have come from and move to after your visit; the date and time of your visit; and your server's IP address.

We may collect this information for statistical purposes to find out how our website is used and navigated, including the number of hits, the frequency and duration of visits, most popular session times. We may use this information to evaluate and improve our web site performance.

Cookies

A Cookie is a piece of information that our web server may send to your machine when you visit our website. The Cookie is stored on your machine, but does not identify you or give us any information about your computer.

A Cookie helps us to recognise you when you re-visit our website and to co-ordinate your access to different pages on the website. With most internet browsers, you can erase Cookies from your computer hard drive, block all Cookies, or receive a warning before a Cookie is stored. If you want to do this, refer to your browser instructions or help screen to learn more.

Changes to our Privacy Policy

From time to time, it may be necessary for us to review and revise this privacy policy. We reserve the right to change our privacy policy at any time for any reasons. If we make a change to the privacy policy, the revised version will be posted on this website so you should ensure to visit this page regularly.

Complaints and Further Information

If you have any enquiries about our privacy policy or concerns about your privacy, please contact us using the details below. We will take reasonable steps to resolve your concern in a timely manner. If you do not consider our response satisfactory, you may contact the Office of the Australian Information Commissioner at its website www.oaic.gov.au or under the GDPR or CCPA, the local regulator of your jurisdiction as applicable.

Contact Us

Please contact us if you wish to discuss any privacy issues, or if you do not wish to receive any future marketing or promotional communications from us at the details below:

ADDRESS: PO Box 238
Pahran, Victoria
AUSTRALIA 3181
EMAIL: hello@rosyexperience.com

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