

Soji Pty Ltd Privacy Policy

Updated: 19 October 2018

Soji Pty Ltd ACN 608 973 404 (**Soji**) is strongly committed to protecting your privacy when you interact with us, our products and services.

Our goal is to provide our clients with services and experiences that create organisations that people want to be part of. Sometimes this means that we use information that you provide to us about yourself to customise that experience. We do this to improve your enjoyment of our products and services. In providing our services to you, Soji Pty Ltd will be transparent about how and why we collect and use your information. In some cases, if you do not want us to collect or use your information in a particular way, then we will give you the opportunity to say so.

The purpose of this Privacy Policy is to explain:

- the application of this Privacy Policy
- the kind of information Soji may collect about you, how we collect it, and how we use it
- how we may disclose that information
- how you can access the information we hold about you
- when we may use your information to contact you
- the protection of your personal information

1. Application of this Privacy Policy

Soji's Privacy Policy applies to personal information collected by Soji, whether we have asked for the information or not. Soji is governed by the Australian Privacy Principles (APPs) under the *Privacy Act 1988* (Cth).

This policy applies only to Soji. It does not apply to any other company or organisation, including those whose services have links to Soji's services. Third party services which have links to Soji's services will govern the use of personal information you submit to them. We do not accept any responsibility or liability for the privacy practices of such third party services.

Soji reviews this policy regularly, and may update it from time to time. Material updates will be displayed on our website under 'Privacy'.

2. Collection and use of personal information

2.1 Why we collect personal information

Soji works with organisations and individuals to provide services such as leadership development programs, leadership events, learning pathways, team engagement activities, cultural strategies, diagnostic tools and sketch speak services.

In providing those services Soji collects personal information about you:

- **because you have provided it to us**, for instance if you, your employer or your organisation sends it to us, as you are a participant in one of our leadership development programs or attending one of our events;
- **because we need it to provide a product or service that you have requested**, because you are a client or work at one of our client organisations engaging us to provide learning and

development or sketch speak services. When delivering diagnostic tools personal information is collected for and from participants.

- **because you work for us as a supplier or contractor**, or apply to us for a job or contract; and
- for purposes directly related to any of the above.

Please note that we do not provide services to or collect information about minors.

2.2 How we collect information when you use our services

We collect the following information and data:

Information that you specifically give us

For example, you may provide information about yourself when you are filling in a form or when you sign up to a service. This type of information may include your name, email address and age. The information that you give us may be:

- **Personal information that is required.** In some instances, you must provide personal information if you wish to use a particular service or participate in an activity;
- Information that you specifically give us such as by answering a survey or being interviewed by us;
- Information that your employer or an organisation you are associated with gives us (with your permission) such as through diagnostic survey set up;
- Information we obtain from other third parties such as survey feedback.

You may be able to make changes to the information you provided to us (for example, if you change your email address) or withdraw the permission you gave us for a particular service. We will make it clear how you do that.

Data we collect that tracks your activity

Soji uses a “cookie” system on its website. A “cookie” is a small data file placed on your machine or device which lets our website store information. This information allows us to make our digital services easier to use and more relevant. Cookies on the Soji website are basic tracking cookies that record an IP address so that next time the user loads any of the soji.com.au pages they receive a more streamlined user experience as they don’t have to reload images. The information gathered may also include your server address, top level domain name, the date and time visited our site, the pages viewed and browser details. These analytics do not identify who you are and are used to improve the functionality and security of our website. No personal details are stored on the website.

Controlling and deleting cookies:

Popular browsers will usually give users a level of control over cookies.

You can set your browsers to accept or reject all, or certain, cookies. You can also set your browser to prompt you each time a cookie is offered.

Most cookies are easy to delete, and the Help function within your browser should tell you how. Some digital services may not load properly or function as intended if cookies are disabled, however it is up to you to determine the balance of convenience and computer privacy that you are comfortable with.

2.3 How we store personal information

Soji will take all reasonable steps to ensure that your personal information is stored securely and is protected. This includes a range of systems and communication security measures, as well as the secure storage of hard copy documents.

Access to your personal information will be restricted to those properly authorised to have access. We keep your personal information for as long as we need it to provide you with the services you requested from us and to comply with legal requirements.

If we no longer require your personal information for any purpose, including legal purposes, we will take reasonable steps to securely destroy or de-identify your personal information except in limited permitted circumstances.

3. Disclosure of personal information

3.1 Disclosure of personal information to third parties

Soji may disclose your personal information to third parties for the following purposes:

- to provide the service you wish to use;
- to provide technical support to you to use a Soji service or program;
- if permitted or required by law; or
- otherwise with your consent.

Soji is assisted by a variety of third parties to deliver the services offered by Soji. These third parties are too numerous to list, and they change from time to time. Some examples of the types of third parties include:

- technology service providers and diagnostic tool providers including: Custom Insight
- Associate facilitators and actors

In many cases, Soji imposes contractual restrictions equivalent to those imposed on Soji under the Privacy Act in respect of collection and use of personal information by those third parties.

These third parties may be located in Australia or overseas locations, including but not limited to Singapore and the USA.

Soji may disclose your personal information (excluding sensitive information about you) to third parties for the purposes of providing Soji's services.

Under no circumstances will Soji sell or receive payment for licensing or disclosing your personal information.

3.2 Information that you disclose publicly

Soji provides diagnostic services on a range of platforms with interactive features that you can contribute to.

When using these services (including online and mobile services), we suggest that you use your discretion and exercise caution when providing your personal information.

Ultimately, you are responsible for maintaining the secrecy of your passwords and/or any personal information. Be responsible whenever you are online or using a digital service.

4. Accessing your personal information

You have the right to request access to personal information that is held by Soji about you. Requests for access will be dealt with by Soji in accordance with the *Freedom of Information Act 1982*.

You also have the right to request the correction of any of your personal information that Soji holds. Soji will take reasonable steps to make appropriate corrections to personal information so that it is accurate, complete and up-to-date. To let us know you no longer agree to Soji using or sharing personally identifiable data, or to seek access to, or correction of, your personal information please contact Soji as follows:

By email:

emma@soji.com.au

By telephone:

0401 783 314

By mail:

Soji Pty Ltd

PO Box 487

Brighton

South Australia 5048

5. Use of your personal information to contact you

We will never knowingly send you unsolicited commercial electronic messages. More information on the Spam Act 2003 is available from the regulator's website: www.acma.gov.au/spam

6. Protection of your personal information

Soji will take all reasonable and practicable steps to ensure that your personal information is properly protected from misuse or loss, and unauthorised access, modification or disclosure.

We encourage you to be vigilant about the protection of your own personal information when using third party digital services (such as social media platforms). As far as reasonably practicable, we will make sure that our relationships with those third parties include appropriate protection of your privacy.

Soji uses Apple Mac computers, with access passwords. We use Dropbox for file storage and sharing which uses encryption for transferring files, for more information click [here](#). We use Office 365 for email which has its own security, for more information click [here](#). We work with an IT consultancy, [Quadra IT](#), for our annual IT audits and healthchecks.

10. Privacy complaints and enquires

You can advise Soji if you no longer agree to Soji using or sharing your personal information by contacting us at the details below.

Soji welcomes feedback about privacy issues and will attend to all questions and complaints promptly.

You can contact Soji about any privacy issues as follows:

By email:

emma@soji.com.au

By telephone:

0401 783 314

By mail:

Soji Pty Ltd

PO Box 487

Brighton

South Australia 5048

If Soji takes more than 30 days to respond to your privacy complaint, or if you are dissatisfied with the outcome, you can make a complaint to the Privacy Commissioner at the Office of the Australian Information Commissioner. The OAIC can be contacted on 1300 363 992 or at www.oaic.gov.au

Page last updated 19 October 2018