

Privacy Policy

The Training Paddock Pty Limited (ABN 74 631 634 421) (“**Training Paddock**,” “**we**,” “**us**” or “**our**”) is the operator of the website and the Training Paddock platform available at www.trainingpaddock.com.au (“**Site**”). Training Paddock is committed to protecting your privacy and complying with the *Privacy Act 1988* (Cth) (“**Privacy Act**”) and in particular the Australian Privacy Principles found in the Privacy Act, and other relevant laws in relation to the management of personal information.

This Privacy Policy is designed to assist you (“**you**” or the “**User**”) in understanding how we collect, handle, use, disclose and safeguard the personal information you provide to us, and in making informed decisions when using our Site, platform and Services (defined below). By accessing, browsing or using the Site or platform, registering an account with Training Paddock, using any of our Services or otherwise providing us with your personal information (or authorising it to be provided to us by someone else), you acknowledge and agree that you have read and understood and agree to be bound by this Privacy Policy, and agree to your personal information being handled as set out in this Privacy Policy. If you do not agree to this Privacy Policy, please do not; use the Site or platform, register a Training Paddock user account, upload or obtain any Services via the Site.

This Privacy Policy is written in simple language. Training Paddock may update this Privacy Policy from time to time so please review it periodically for changes as publicised on our Site. Your continued use of the Site and Services, requesting our assistance or the provision of further personal information to us (directly or via an authorised person) after this Privacy Policy has been revised constitutes your acceptance of the revised Privacy Policy.

1. TYPE OF INFORMATION WE COLLECT

Training Paddock collects a range of personal information from you depending on the nature of your relationship with us. Training Paddock collects personal information to the extent that it is necessary to carry out its core business activities of providing online platforms for workers and employers/businesses in the agriculture industry and other industries from time to time to connect, access career opportunities and manage worker credentials (together the “**Services**”) and such other services that are ancillary to the carrying out of those Services.

When you access the Site, Services or register on the Training Paddock platform, or otherwise interact with us, you may provide us with the following main types of information.

- **Personal information** you knowingly choose to provide to us, that is collected by us on an individual basis. When you register or sign up to the Training Paddock platform or to any of our Services you may provide us with personal information about yourself (or your company if you are accessing the Site and platform as an employer) including your name, age or date of birth, address, phone number, email address and other contact details. For workers and students who have registered an account with Training Paddock, we may also collect details of employment history, educational qualifications and any relevant certifications held.

If you register as an employer or business with Training Paddock, you may also provide your credit or debit card information for purchasing certain products and/or services available on the platform using a third party payment processor (where applicable).

If you register as a worker or student with Training Paddock, the personal information we collect from you may also include sensitive information, which may be criminal record or health information. Sensitive information is only collected in circumstances where you have provided your consent and the information is reasonably required.

- **Website use information**, which we collect on an aggregate basis as you and others browse our Site. Similar to other commercial websites, our Site utilises a standard technology called “cookies” (see explanation below, “What Are Cookies?”) and web server log files to collect information about how our Site is used for the purpose of improving your experience when using

our Site. Information gathered through cookies and web server logs may include: your IP address; device details, operating system and browser information; geographic location; the fact that you have visited the Site, the date and time of your visit, the pages viewed, time spent at our Site, and the website that linked you to our Site.

- **Email Information:** If you choose to correspond with us through email, we may retain the content of your email messages together with your email address and our responses. We provide the same level of protection for electronic communications as we do for information received by mail and telephone.
- **Social Media:** We may from time to time use social networking services such as Twitter, Facebook, LinkedIn and YouTube to communicate with the public about our Site and Services. When you communicate with us using these services we may collect your personal information, but we only use it to help us to communicate with you and the public. The social networking services will also handle your personal information for its own purposes. These services have their own privacy policies which you can access on their websites.

2. COLLECTION OF PERSONAL INFORMATION

We may collect these types of personal information either directly from you, or from third parties, in a variety of ways:

- because you have provided it to us, for example, if you visit and interact with us on the Site, the platform, related software (including any mobile applications where applicable) with our content or advertising in any manner (e.g. materials that you post to the Site and platform and the emails, letters or messages you send to us (including via our social media platforms where applicable));
- to conduct our business and provide the Services;
- when you engage in transactions with Training Paddock;
- to handle complaints;
- because we need it to provide a product or service that you have requested, for example, if you subscribe to an email list or to register yourself as a User of our Site or Services;
- we may collect information about your usage of the Site (including cookie collection);
- on forms, questionnaires and surveys you have completed;
- when you contact us independently of the Site or platform, such as by email, phone or in person;
- because you work for us or apply for a job or position with us; or
- for purposes related to any of the above.

You may elect not to provide us with your personal information, but this may affect your use of our Site and platform and/or our ability to provide our Services or assistance to you on your behalf.

You must not provide us with personal information about another person unless you have clear consent from that person to do so, and you have told them that their personal information will be handled in accordance with this Privacy Policy and where they can find it. On all occasions personal information is collected, held, used and disclosed by us in accordance with this Privacy Policy.

When providing personal information to us, please be aware that there are risks involved in transmitting such information across the internet.

3. USE AND DISCLOSURE OF YOUR PERSONAL INFORMATION

We use personal information primarily for the purposes of providing the Services, monitoring the use of the Services and the Site, marketing and promotional efforts in relation to the Services, improvement of our content and service offerings, and customisation of our Site's content, layout, services and other lawful purposes.

Occasionally, we may also use the information we collect to notify you about important changes to our Site, new services, and special offers we think you will find valuable. You may notify us (at support@trainingpaddock.com.au) at any time if you do not wish to receive these offers or unsubscribe from any mailing or marketing lists.

We may use the personal information we collect from you when you register with Training Paddock, make a purchase, sign up for our newsletter, respond to a survey or marketing communication, use the Site, or use certain other site features in the following ways.

- To establish, maintain and administer your Training Paddock account.
- To personalize user experience and to allow us to deliver the type of content, service and product offerings that may be of interest to you.
- To provide services to you.
- To improve our Site and Services in order to better serve you.
- To enhance the safety and security of our Users and Services.
- For customer support.
- For research and development, for example to aggregate with information of other users for the purpose of research and industry reports or information and data analysis services.
- To enable communications to or between users.
- To provide promotions or contests.
- For quality assurance and training purposes.
- In connection with legal proceedings.
- To send you service or promotional communications including surveys and information about security updates.
- To verify information uploaded to our Site and platform.

For direct marketing purposes, your personal information will be added to our database. The database may be used for ongoing marketing and educative purposes. The type of marketing and educative activities that we undertake includes forwarding material to you so that you are kept updated in relation to our Services. If at any time you do not wish to continue receiving this information, we provide an "opt-out" procedure in each communication to you.

Training Paddock might disclose your personal information to other entities or individuals in order to facilitate the purpose for which the information was collected. Such entities and individuals include:

- if you are a worker or student, we may disclose your personal information (including sensitive information) to an employer or business registered on the Training Paddock platform to provide the Services or otherwise where you have given us permission to make the disclosure to the employer in accordance with this Privacy Policy;
- if you are an employer or business, we may disclose your personal information to a worker or student registered on the Training Paddock platform to provide the Services or otherwise where you have given us permission to make the disclosure to the worker in accordance with this Privacy Policy;
- third party service providers for the purpose of enabling them to provide a service on our behalf such as (but not limited to) payroll, superannuation administration, information technology services providers, communications suppliers and our business partners, third party payment gateway providers if you conduct any transaction that requires a payment by you for the purpose of facilitating the transaction to be completed, data storage, web hosting, back-up and data analysis service providers;
- third party partners with whom Training Paddock has a commercial relationship (including but not limited to employment and government agencies);
- any related entity of Training Paddock;
- any applicable regulator or third party for the purpose of legislative or contractual compliance and/or reporting or when Training Paddock believes in good faith that disclosure is reasonably necessary to protect the property or rights of Training Paddock, third parties or the public at large; or
- other entities if you have given your consent.

From time to time, these parties may reside outside Australia. Our contracts with these parties generally include an obligation for them to comply with Australian privacy law and this Privacy Policy. However you acknowledge that, by agreeing to the disclosure of your personal information to these entities outside of Australia, we will no longer be required to take reasonable steps to ensure the recipient's compliance with the Australian privacy law in relation to your personal information and we will not be liable to you for any breach of the Australian privacy law by these overseas recipients. On this basis, you consent to such disclosure.

We will not use or disclose personal information that we collect for any purposes other than the primary purposes of collection referred to above, unless:

- such use is related to the primary purpose (or directly related to the primary purpose in the case of sensitive information) and you would reasonably expect us to use or disclose the information for that purpose;
- in the case of direct marketing not related to our activities, we have obtained your prior consent (unless it is not practicable to seek your consent and we otherwise comply with the requirements of the Privacy Act and other applicable privacy laws and you have not since requested we cease direct marketing to you); or
- the use or disclosure is otherwise permitted under the Privacy Act or required by law.

4. STORAGE AND SECURITY OF COLLECTED INFORMATION

The security of your personal information is important to us. We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. We take all reasonable steps to protect any personal information that we hold from misuse, interference and loss and from unauthorised access, alteration and disclosure. However, data protection measures are never completely secure and, despite the measures we have put in place, we cannot guarantee the security of your personal information. You must take care to protect your personal information (for example, by protecting any usernames and passwords). You should notify us as soon as possible if you become aware of any security breaches.

5. WHAT ARE COOKIES?

Cookies are very small data files transferred onto computers or devices by websites for record-keeping purposes and to enhance functionality on the website. Most browsers allow you to choose whether to accept cookies or not. If you do not wish to have cookies placed on your computer, please set your browser preferences to reject all cookies before accessing our Site.

If you choose to have your browser refuse cookies, it is possible that some areas of our Site and platform will not function as effectively when viewed by the Users. A cookie cannot retrieve any other data from your hard drive or pass on computer viruses.

6. HOW DO WE USE INFORMATION WE COLLECT FROM COOKIES?

As you visit and browse our Site, the Site uses cookies to differentiate you from other users. In some cases, we also use cookies to prevent you from having to log in more than is necessary for security. We may use cookies, in conjunction with our web server's log files, to allow us to collect data such as the aggregate number of people visiting our Site and which parts of the Site are most popular. This helps us gather feedback to constantly improve our Site and better serve our clients and customers. We will handle any personal information collected by cookies in the same way that we handle personal information described in this Privacy Policy.

7. PERSONAL INFORMATION ABOUT EMPLOYEES OR JOB APPLICANTS

We may collect personal information from you if you apply for a job with and/or become employed by us. In these circumstances:

- you authorise us to collect any personal information (whether written or verbal) from any referee or previous employer mentioned in your application for employment or curriculum vitae for evaluation of your application for employment and to hold such information on your personal file for future evaluation of your employment by us;
- you acknowledge that your personal information is collected for the purpose of evaluating your application for employment by us and, should you accept employment with us, the assessment of your continued employment by us and the administration by us of your remuneration and any PAYE obligations; and
- you acknowledge that a failure by you to provide the requested personal information may have a detrimental effect on our ability to give your application proper consideration. You can request to access and/or correct your personal information in accordance with this Privacy Policy.

8. HOW CAN YOU ACCESS AND CORRECT YOUR INFORMATION?

You may review, edit, correct or delete any personal information you submit to us at any time. You just need to log into your Training Paddock account to do this.

Under the Privacy Act, you have a right to ask for access to personal information that we hold about you and ask that we correct that personal information.

We take reasonable steps to ensure that the personal information we hold about you is accurate, complete and up to date. However, we also rely on you to advise us of any changes to your personal information. You can ask for access or correction by contacting us using the contact details below. Please contact us as soon as possible if there are any changes to your personal information or if you believe the personal information we hold about you is not accurate, complete or up to date so that we can update it accordingly.

We will ask you to verify your identity before we give you access to your information or correct it, and we will try to make the process as simple as possible. If we refuse to give you access to, or correct, your personal information, we will notify you in writing setting out the reasons.

9. WHAT ABOUT OTHER WEBSITES LINKED TO OUR SITE?

From time to time our Site may contain links to the websites of other entities. If you click on such links, you will be transferred to the websites of these entities. We have no control over and are not responsible for, the privacy practices of these entities, or for the practices employed by websites linked to or from our Site, or the information or content contained therein. Often links to other websites are provided solely as pointers to information on topics that may be useful to the Users of our Site.

Please remember that when you use a link to go from our Site to another website, our Privacy Policy is no longer in effect. Your browsing and interaction on any other website, including websites which have a link on our Site, is subject to that website's own rules and policies. You should read the privacy policy of these entities to find out how they handle your personal information when you visit their websites.

10. ACQUISITION OR CHANGES IN OWNERSHIP

In the event that the Site or platform (or a substantial portion of its assets) are acquired, your information would be considered part of those assets, and may be part of those assets that are transferred to the acquirer.

11. COMPLAINTS

If you wish to make a complaint about how we have handled your personal information you can contact us using the contact details below. You will need to provide us with sufficient details regarding your complaint together with any supporting evidence.

If we receive a complaint from you about how we have handled your personal information we will refer your complaint to our relevant officer who will investigate the issue and determine what action (if any) we should undertake to resolve your complaint. We will contact you if we require any additional information from you and will notify you in writing of the outcome of the investigation.

If you are not satisfied with our response you can contact us to discuss your concerns or complain to the Office of the Australian Information Commissioner (OAIC) via www.oaic.gov.au.

12. HOW TO CONTACT US

If you have a query relating to this Privacy Policy or wish to make a complaint, please contact us using the following contact details:

By email: support@trainingpaddock.com.au

By post: Attention
The Privacy Officer
570 McLeods Lane
Trangie NSW 2823