

PRIVACY POLICY

1. Introduction

This Privacy Policy sets out the commitment of RDG Insights Pty Ltd, trading as Retail Doctor Group, to the privacy of the visitors and users (collectively defined as “Users”) of the Retail Doctor Group websites (“Sites”) , and governs Users’ rights regarding privacy and data protection.

The Sites are operated by Retail Doctor Group and Retail Doctor Group is the data controller. By using the Sites, or by registering as a User to the Services that we provide (“Services”), you confirm that you have read the terms of this Privacy Policy. We ask you to read this Privacy Policy carefully.

For the purpose of this Privacy Policy, “personal data” means any information which relates to an identifiable living individual.

2. Lawful Collection and Use of Data

Retail Doctor Group collects information in several ways from different parts of our Sites, our mobile application and other activities such as social media, apps and surveys. Examples of these activities are explained below and include:

Registration to our services: some personal data is gathered when you register for our Services, including when you fill out request forms on our Sites, such as name, email address, postal address, job title and mobile device ID.

Research Activities: personal data may also be collected from you when you participate in a survey or in a research activity proposed by Retail Doctor Group to the Users.

The main purposes for which we use your personal data are to:

- Contact you in relation to our Services via email, through mobile notifications or texts or any other proposed communication options you have consented to
- Inform you of updates to our Services, new features and details relevant to you
- Help you when you contact us
- Protect Retail Doctor Group from fraudulent behaviour
- Update, enrich and clean your data to better understand your needs and how we can improve our Services

We have set out below more detailed information about how we use your personal data. We are also required by law to explain the legal basis for processing your personal data. These legal bases are listed below and could be different for each use case:

- we have your consent for the use of your personal data
- we need to use your personal data in order to perform a contract with you
- we need to process your data to comply with a legal obligation

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- we need to process your data in order to protect your vital interests or someone else
- the processing is necessary to perform a task in the public interest or
- the use of your personal data is necessary for our (or our clients') legitimate interests (in which case we will explain what those interests are).

We will never misrepresent ourselves or what we are doing. If you receive an email that concerns you, purporting to be from us, please let us know as shown below in 'How to Contact Us'.

Case	Purpose	Data collected/processed
Fraud Protection	Protection of our business interests against fraudulent behaviour	IP address, browser specifications, device specifications, postal addresses, email addresses
Survey Participation Uniqueness	Prevention of multiple entries in surveys by the same individuals	IP address, browser specifications, device specifications

We will not make your personal data available to anyone else without your agreement unless it is if required by law and/or by regulators or authorities. In these cases, the legal basis of our disclosure of your personal data is it is necessary to comply with a legal obligation. The data that we disclose may include your name and e-mail address.

Our third party partners are all contractually bound to keep any information they collect and disclose to us, or that we collect and disclose to them, confidential and must protect it with security standards and practices that are equivalent to our own.

Where We Store Your Personal Data

For personal data subject to the GDPR and transferred to a country or territory outside the European Economic Area (EEA), we shall put adequate safeguards in place to ensure the transfer is made by a lawful method for the purposes of EU data protection law and secure. For personal data which is not subject to the GDPR, Retail Doctor Group shall strictly follow any other applicable data protection laws.

Retail Doctor Group's data storage servers are located in Australia.

We take appropriate technological and organisational measures to protect your personal data, both during transmission and once we receive it. Our security procedures are consistent with generally accepted standards used to protect personal data.

All our employees are contractually obliged to follow our policies and procedures regarding confidentiality, security and privacy.

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3. Confidentiality and Industry Requirements

Whenever Retail Doctor Group handles personal data as described above, regardless of where this occurs, Retail Doctor Group takes steps to ensure that your information is treated securely and in accordance with this Privacy Policy. Unfortunately, no data transmission can be guaranteed to be 100% secure. As a result, while we strive to protect your personal data, Retail Doctor Group cannot ensure or warrant the security of any information you transmit to us or from our online products or services, and you do so at your own risk. Once we receive your transmission, we will take reasonable steps to ensure our systems are secure.

We adhere to standards and industry requirements.

4. Cookie Disclosure

Cookies are small text files stored on your computer or mobile device by a website that assigns a numerical user ID and stores certain information about your online browsing. They are used to help users navigate websites efficiently and perform certain functions. The website sends information to the browser which then creates a text file on the user's computer or mobile device. Every time the user goes back to the same website, the browser retrieves and sends this file to the website's server.

We gather certain information automatically and store it. This information may include things like Internet Protocol addresses (IP address), browser type, Internet service provider ("ISP"); referring/exit pages, operating system and date/time stamp.

We use this automatically collected information to analyse trends such as browser usage and to administer the site, e.g. to optimise the Sites experience depending on your browser type. We may also use your IP address to identify your country and also to protect our business against fraudulent behaviour.

Retail Doctor Group defines cookies within 3 categories:

- Required to use the Sites
- Security-specific
- Behavioural or advertising research cookies

For more information, please log in and access your cookie preferences page for your account where you are able to adjust your cookie settings.

As you use the Internet, a trail of electronic information is left at each website you visit. This information, which is sometimes referred to as 'clickstream data', may be collected and stored by a website's server. Clickstream data can tell us the type of computer and browsing software you use and the address of the website from which you linked to the Site. We may collect and use clickstream data as aggregated information to anonymously determine how much time visitors spend on each page of our Sites, how visitors navigate throughout the Sites and how we may tailor our web pages to better meet the needs of visitors. This information will be used to improve our Sites and our Services. Any collection or use of clickstream data will be anonymous and will not intentionally contain any personal data.

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5. Accuracy

We take reasonable steps to keep personal data in our possession or control accurate, complete and current, based on the most recent information made available to us by you and/or by our client.

We rely on you to help us keep your personal data accurate, complete and current by answering our questions honestly. You are responsible for ensuring that you notify us of any changes to your personal data.

6. Children's Data

Retail Doctor Group recognizes the need to provide further privacy protections with respect to personal data collected from children. Our Sites are not intended or designed to attract children under the age of 16. We do not knowingly collect personal information from or about any person under the age of 16. If you are under 16 years old and wish to ask a question or use this Site in any way which requires you to submit your personal information, please ask your parent or guardian to do so on your behalf.

7. Rights of Individuals

To request access to personal data that we hold about you, you should submit your request in writing to the e-mail address or postal address shown below in "*How to Contact Us*".

You have the following rights in relation to your personal data:

- Right to change your mind and to withdraw your consent
- Right to access your personal data
- Right to rectify your personal data
- Right to erase your personal data from our systems, unless we have legitimate interest reasons for continuing to process the information
- Right to port your personal data (portability right)
- Right to restrict processing of your personal data
- Right to object to the processing of your personal data

8. Data Storage and Retention

Personal data will be retained only for such period as is appropriate for its intended and lawful use. Retail Doctor Group will retain your personal data for as long as you have not unsubscribed from our database. In case you unsubscribe from our database, we shall retain data for no longer than 3 months after you unsubscribe, unless otherwise required by law. Personal data that is no longer required will be disposed of in ways that ensure their confidential nature is not compromised.

9. Notification of Material Change

We reserve the right to change, add to, or remove portions from this Privacy Policy at any time. You should read this page regularly to ensure you are updated as to any changes. However, if any material change is made to this Privacy Policy, we will notify you of that change. Non-

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material changes to this Privacy Policy will be announced through the Sites only. Your continued access to the Sites and Services after such changes conclusively demonstrates your consent to any changes.

We will always display the most up-to-date privacy policy on this web page.

10. How to Contact Us

If you have any questions or concerns relating to your privacy or to Retail Doctor Group privacy practices, you can contact Retail Doctor Group:

- by email at businessfitness@retaildoctor.com.au

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