# **Privacy Policy**

# Version: August 2022

This privacy policy sets out how icetana Limited ACN 140 449 725 ("**icetana**"/ "**we**" / "**us**"/ "**our**") handles "personal information" or "personal data" that you provide to us or that we collect ("**Personal Information**"), when you use our products, services, or otherwise interact with us, unless a different policy is displayed.

icetana offers products and services through its website (**Website**) and software platforms, referred to as "**Services**" in this policy.

All references to "you" and "your" in this Privacy Policy are references to:

- (a) users of our Services;
- (b) our shareholders; and
- (c) our contractors, suppliers, potential employees, employees and other individuals that we engage and interact with in the course of running our business.

We are committed to protecting your privacy and your information that we collect. This privacy policy sets out the way we collect and handle Personal Information and how we comply with the *Privacy Act 1988* (Cth) (**"Privacy Act"**) and the Australian Privacy Principles (**"APPs"**).

In collecting Personal Information, by law, we are required to provide you with information about us, about why and how we use your Personal Information, and about the rights you have over your Personal Information.

Any enquiries about our use of your Personal Information should be addressed to the contact details below.

Our address is % WeWork Level 32, 152 St Georges Terrace, Perth WA 6000, Australia. You can contact us by post at the above address, by email at <u>info@icetana.com.au</u>.

If you do not agree with this policy, you should not access or use our Website, Services or otherwise interact with our business.

# 1 WHAT INFORMATION DO WE COLLECT

We collect and hold your Personal Information which may include your name, address, telephone number, email address, billing information, your company name, your position/title and other information relating to you or your business relevant to our interaction with you, which may include the supply of Services to you.

For customers and potential customers, we collect information about you in order to provide you with the Services. This information is required initially, to enable you to purchase our Services and after that, to communicate with you to support your use of the Services.

For shareholders, we may also collect information about you including your tax file number and bank account details in order to register you as a shareholder. We may do this through a share registry provider we engage.

For present and prospective employees, we also collect information in relation to your education, qualifications and employment history.

We may also collect non-personally identifiable information about you (such as anonymous usage data, IP addresses and location, browser or platform type etc.).

Further examples of the information (including Personal Information) we collect are set out below.

#### 2 WHEN AND HOW DO WE COLLECT PERSONAL INFORMATION

We collect your Personal Information during the course of providing our Services to you. This includes, without limitation, when you use our Website to request, purchase or order our Services (including by completing forms on our Website), when you use the Services or otherwise via customer enquiries and communications.

Generally, we collect your Personal Information directly from you or automatically through your use of our Services with your consent but we may also collect your Personal Information from other people or organisations if you have given your consent to them.

More detailed examples of the Personal Information we collect and how we collect it include:

#### 2.1 Information you provide to us when you buy or use our Services

We collect information about you when you input it during your use of our Services in the following ways:

- (a) We collect Personal Information about you when you register and configure preferences when using our Services. For example, you provide your contact information and, in some cases, billing information, when you purchase our Services or when you register with us to use the Services. This information may include identifying information such as your name, address, telephone number or email address, your job title, and other information relating to you or your business relevant to our supply of Services to you.
- (b) We collect and store Personal Information from you when you interact with our Website. For example, you provide Personal Information (which may include your name, email address, phone number, title and country of residence), and/or content to us when you provide feedback, submit an online form, request a demonstration, submit an enquiry, or when you participate in any surveys, promotions, activities or events.
- (c) When you interact with our customer support regarding a problem you are experiencing with one of our Services, we may collect your contact information, a summary of the problem you are experiencing, and any other documentation, screenshots or information that would be helpful in resolving the issue. Such interactions may involve you designating yourself as a technical contact, opening a support ticket, speaking to one of our representatives directly or otherwise engaging with our support team.
- (d) When you purchase Services from us, or register with us, we may collect payment and billing information. For example, we may ask you to designate a billing representative, including name and contact information, at the time of purchase of our Services or upon registration. You might also provide payment information, such as payment card details, and any other billing information, which we collect via secure payment processing services.

#### 2.2 Other information we collect when you use the Website or Services

We collect information about your interaction with our Website, your usage preferences, and your communications with us. This is information we receive from devices you use when you access our Services. How much of this information we collect depends on the type and settings of the device you use to access our Services and includes the following.

(a) Location information (including location information from your mobile device (if applicable)). We use your IP address and/or country preference in order to approximate your location to provide you with a better experience.

- (b) Device and connection information about the computer, phone, tablet, or other devices you use to access our Services such as your connection type and settings when you install, access, update, or use our Services; your operating system, browser type, statistics on your page views, traffic to and from sites, referral and exit URLs, ad data, your IP address, and device identifiers.
- (c) We use cookies, web beacons, unique identifiers, and similar technologies to collect information about the pages you view; the features you use; the links you click; the type, size and filenames of attachments you upload to the Services; pages you create; and other actions you take when using our Website. Our third-party partners, such as our advertising and analytics partners, also use cookies and other tracking technologies to provide functionality and to recognise you across different Services and devices. See our further discussion on this below under the "Cookies" section.

#### 2.3 Information we receive from other sources

- We may supplement the Personal Information we collect directly from you with information collected from third parties including other users of our Services, third-party service providers, our related companies, social media platforms, public databases, and from our business distributors and resellers.
- (b) If you give us personal information about someone else, you must do so only with that person's authorisation. You should inform them how we collect, use, disclose, and retain their personal information according to this privacy policy.
- (c) Other users of our Services may provide information about you when they submit content when using our Services. For example, you may be mentioned in a support ticket or a team member may upload content about you. We also receive your email address from other users when they provide it in order to invite you to access the Services. Similarly, an administrator may provide your contact information when they designate you as the billing or technical contact on your company's account or when they designate you as an administrator.
- (d) We receive information about you when you or your administrator integrate third-party apps or link a third-party service with our Services. For example, you or your administrator may integrate our Services with other services you use, such as to allow you to access, store, share and edit certain content from a third-party through our Services. The information we receive when you link or integrate our Services with a third-party service depends on the settings, permissions and privacy policy controlled by that third-party service. You should always check the privacy settings and notices in these third-party services to understand what data may be disclosed to us or shared with our Services.
- (e) We use the consulting, implementation, training and other services provided by a global network of partners to support our Services. Some of these partners also help us to market and promote our Services, generate leads for us, and resell our Services. We receive information from these partners, such as billing information, billing and technical contact information, company name, what Services you have purchased or may be interested in, evaluation information you have provided, what events you have attended, and what country you are in.

#### 3 WHY WE NEED YOUR PERSONAL INFORMATION

#### 3.1 Our Required Purposes

We only collect or hold your Personal Information for legitimate purposes, including to provide you with our Services, for the proper administration of our Website, to engage third party service providers (such as website and application developers, hosting and other service providers) to assist us with providing you with our Services, and to comply with our legal obligations to you.

In particular, we need your Personal Information for the following "Required Purposes":

- (a) To provide the Services and personalise your experience: We use information about you to provide the Services to you, including creating your account, customer support, and operating, maintaining, and improving the Services.
- (b) To improve the quality and design of our Services by storing, tracking, analysing and processing customer preferences and trends, as well as user activity on our Website to create new features, functionality and services around our Services. We use information and feedback about how people use our Services to troubleshoot, identify trends and usage patterns, and areas for integration and to improve our Services and to develop new products, features and technologies that benefit our users. For example, we review the usage of certain features, webparts and tiles to help prioritise development that will have the greatest benefit to our users.
- (c) To maintain our business relationship with you by answering any questions or queries you may have about icetana, our Services (including our Website); communicating with you about our Services; sending you transactional communications, such as confirming your purchases; sending you technical notices, updates, security alerts, and administrative messages; creating and updating our database(s) and other records, providing sales and support services to you and otherwise responding to your enquiries. We send you email notifications when you or others interact with you on the Services, for example, when you are mentioned in a support ticket. We also provide tailored communications based on your activity and interactions with us, for example new updates to features that you might be interested in.
- (d) To market and advertise to you including by sending you newsletters, special offers, and promotions, or otherwise contacting you about our Services, or information we think may interest you. We may communicate with you through phone, email, or by displaying icetana ads on other companies' websites and applications. You can control whether you receive these communications as described below under "Opt-out of communications".
- (e) To comply with the law and exercise our legal rights including exercising rights we may have under law or a contract between us and you, or between us and a third party. Where required by law or where we believe it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory, and audit functions, and disclosures in connection with the acquisition, merger or sale of a business.
- (f) With your consent: We use information about you where you have given us consent to do so for a specific purpose not listed above. For example, we may publish testimonials to promote our Services, with your permission.

If you do not provide us with your Personal Information, we may not be able to carry out all of the Required Purposes or fulfil our obligations arising under the Required Purposes.

# 3.2 European Economic Area (EEA) users – our legal bases for processing your Personal Information:

We collect and process information about users in the EEA only where we have legal bases for doing so under applicable EU laws. We rely on the following legal bases to process your Personal Information, as appropriate, depending on the Services you use and how you use them.

- We need it to provide you the Services, including to operate the Services, provide customer support and personalized features and to protect the safety and security of the Services;
- (b) We need it to satisfy a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote the Services and to protect our legal rights and interests;
- (c) You have given us consent to process your Personal Information for a specific purpose; or
- (d) We need to process your Personal Information to comply with a legal obligation.

If you have consented to our use of your Personal Information for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your Personal Information because we or a third party (e.g. your employer) have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using the Services.

#### 3.3 Can you remain anonymous or use a pseudonym?

Generally speaking, we do not allow you to use a pseudonym or to otherwise remain anonymous, as this is impractical for our business purposes.

We also note that if you do not provide us with some or all of the Personal Information we request, we may not be able to provide you with the relevant Services. This may also have an effect on whether we can begin or continue a relationship with you, and whether you can use or access our Services.

#### 4 WHEN DO WE DISCLOSE OR SHARE YOUR INFORMATION

Generally speaking (and as described above under the heading "Why we need your Personal Information") we will disclose your Personal Information for our Required Purposes. We may also disclose your Personal Information with your consent, or where we are authorised or required to do so by law, or to our affiliates, partners or service providers (including hosting providers, payment processors, and support service providers) in order to assist us to provide our Services to you. We have listed below to whom and when we disclose your Personal Information.

#### 4.1 Managed accounts and administrators

If you register or access the Services using an email address with a domain that is owned by your employer or organisation or associate that email address with your existing account, and such organisation wishes to establish an account or site, certain information about you including your name, profile picture, contact info, content and past use of your account may become accessible to that organisation's administrator and other Service users sharing the same domain. If you are an administrator for a particular site or group of users within the Services, we may share your contact information with current or past Service users, for the purpose of facilitating Service-related requests.

#### 4.2 Disclosing or sharing with third parties

We engage entities to help us operate, provide, improve, integrate, customise, support and market our Services and in doing so, we may need to disclose certain information about you in the following circumstances:

- (a) Service Providers: The third-party service providers we work with provide website and application development, hosting, maintenance, backup, storage, virtual infrastructure, payment processing, analysis and other services for us, which may require them to access or use information about you. If a service provider needs to access information about you to perform services on our behalf, they do so under close instruction from us, including appropriate security and confidentiality procedures designed to protect your information.
- (b) Our Partners: We may require consulting, sales, support, and technical services from third parties in order to deliver and implement customer solutions in relation to our Services. These third parties may need your information to provide their services, such as to assist with billing and collections, to provide localised support, and to provide customisations. We may also share your information with these third parties where you have agreed to that sharing.
- (c) Third Party Sites: In using the Services, there may be links that direct you to unrelated third party websites or services whose privacy practices may differ from ours. If you submit information to any of those third party sites, your information is governed by their privacy policies, not this one. We encourage you to carefully read the privacy policy of any website you visit.
- (d) Third-Party Widgets and Social Media Widgets: Some of our Services may contain widgets and social media features. These widgets and features collect your IP address, which page you are visiting on the Services, and may set a cookie to enable the feature to function properly. Widgets and social media features are either hosted by a third party or hosted directly on our Services. Your interactions with these features are governed by the privacy policy of the company providing it.
- (e) With your consent: We share information about you with third parties when you give us consent to do so. For example, we may display personal testimonials of satisfied customers on our public Website with the customer's permission.
- (f) Law Enforcement, Public or Governmental Agencies: We may be required to share information about you with a third party if we believe that sharing is reasonably necessary to (a) comply with any applicable law, regulation, legal process or governmental request, including to meet national security requirements, (b) enforce our agreements, policies and terms of service, (c) protect the security or integrity of our products and Services, or (d) protect icetana, our customers or the public from harm or illegal activities.

#### 4.3 Sharing with our affiliates

- (a) We share information that we collect with our affiliates and subsidiary icetana entities, and, in some cases, with prospective affiliates, in order to operate and improve products and services and to offer other icetana-affiliated services to you. This includes companies that own or operate the Services listed here. Affiliated companies are companies owned or operated by us. This privacy policy applies to the information we disclose to these entities.
- (b) Corporate Transactions: We may share or transfer information we collect under this privacy policy in connection with any merger, sale of company assets, financing, or

acquisition of all or a portion of our business to another company. You will be notified via email and/or a prominent notice on our Website if a transaction takes place, as well as any choices you may have regarding your information.

#### 4.4 Sharing internationally

Some of our affiliates, partners and service providers or the services they provide may be based outside of your country of residence (including in the United States, Canada, Japan, Singapore, Brazil, the United Kingdom and the United Arab Emirates). By providing us with your Personal Information, you acknowledge that your Personal Information may be used, stored and disclosed overseas, including in jurisdictions that may not provide equivalent levels of data protection as your home jurisdiction. To protect your Personal Information we take care to work with entities, partners and service providers who are based in countries that provide adequate levels of data protection, or we otherwise take steps to ensure that your Personal Information receives adequate levels of data protection in the jurisdictions in which it is processed in accordance with all applicable privacy laws (including the GDPR). For example, when we share information of customers in the European Economic Area, the UK, or Switzerland, we make use of standard contractual data protection clauses, which have been approved by the European Commission.

#### 5 Do we use "cookies"?

When you visit our Website or use our Services, the server may attach a "cookie" to your computer's memory. A "cookie" assists us to store information about how you use our Services and to make assumptions about what information may be of most interest to you. This information is generally not linked to your identity. We may use knowledge of your user experience to better understand what Services may be of interest to you and to collect statistical information. Our Cookie Policy is set out below.

- (a) What Are Cookies: As is common practice with almost all professional websites, our Website uses cookies, which are tiny files that are downloaded to your computer, to improve your experience. This policy describes what information they gather, how we use it and why we sometimes need to store these cookies. We will also share how you can prevent these cookies from being stored however this may downgrade or 'break' certain elements of our Website's functionality.
- (b) How We Use Cookies: We use cookies for a variety of reasons detailed below. Unfortunately, in most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to our Website. It is recommended that you leave on all cookies if you are not sure whether you need them or not, in case they are used to provide a Service that you use.
- (c) Disabling Cookies: You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of our Website and many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of our Website. Therefore it is recommended that you do not disable cookies.
- (d) The Cookies We Set:
  - Email newsletters related cookies: We offer newsletter or email subscription services and cookies may be used to remember if you are already registered and whether to show certain notifications which might only be valid to subscribed/unsubscribed users.
  - (ii) Forms related cookies: When you submit data through a form such as those found on contact pages or comment forms, cookies may be set to remember your user details for future correspondence.

- (iii) Site preferences cookies: In order to provide you with a great experience on our Website, we provide the functionality to set your preferences for how our Website runs when you use them. In order to remember your preferences, we need to set cookies so that this information can be recalled whenever you interact with a page which is affected by your preferences.
- (e) Third Party Cookies: In some special cases we also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through our Website.
  - (i) Our Website uses Google Analytics which is one of the most widespread and trusted analytics solution on the web for helping us to understand how you use our sites and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content. For more information on Google Analytics cookies, see the official Google Analytics page.
  - (ii) Our Website uses ZoomInfo analytics which is a well-known analytics solution on the web for helping us to understand how you use our sites and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content. For more information on ZoomInfo analytics cookies, see the official ZoomInfo analytics Data Sources and Security page.
  - (iii) From time to time we test new features and make subtle changes to the way that our Website is delivered. When we are still testing new features these cookies may be used to ensure that you receive a consistent experience whilst on our Website whilst ensuring we understand which optimisations our users appreciate the most.
  - (iv) Partners may advertise on our behalf and use affiliate tracking cookies, which simply allows us to see if our customers have come to the site through one of our partner sites so that we can credit them appropriately and where applicable allow our affiliate partners to provide any bonus that they may provide you for making a purchase.
  - (v) We may also use social media buttons and/or plugins on our Website that allow you to connect with your social network in various ways. For these to work, the social media sites including; Google+, Facebook, Twitter, Instagram, YouTube, Instagram and Linkedin, will set cookies through our sites which may be used to enhance your profile on their site or contribute to the data they hold for various purposes outlined in their respective privacy policies.

#### 6 HOW YOUR PERSONAL INFORMATION IS STORED AND SECURED

We take all reasonable steps to keep your Personal Information secure and to ensure it is protected against misuse, loss, unauthorised access, modification or inappropriate disclosure.

We urge you to take steps to keep your Personal Information safe, such as choosing a strong password and keeping it private, as well as logging out of your account after using our Services, and closing your web browser when you are finished using the Service on a shared or unsecured device.

#### 6.1 Information storage and security

(a) We use industry standard technical and organisational measures to secure the information we store and to ensure it is protected against misuse, loss, unauthorised access, modification or inappropriate disclosure. We may keep your information in both hard copy and electronic forms, but adopt appropriate technical and

organisational security measures to protect it including by storing it in secure systems accessible only to authorised personnel.

- (b) While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that information, during transmission through the Internet or while stored on our systems or otherwise in our care, is absolutely safe from intrusion by others.
- (c) If you install our Services on your own infrastructure or data centre, responsibility for securing storage and access to the information you put into the Services rests with you and not icetana. We strongly recommend that server or data centre users configure SSL to prevent interception of information transmitted over networks and to restrict access to the databases and other storage points used.

#### 6.2 Retention of information

We retain information we collect about you for as long as necessary for the Required Purposes. This means the period of time we keep your information depends on the category of information, as described below. After such time, we will either delete or anonymise your information or, if this is not possible (for example, because the information has been stored in backup archives), then we will securely store your information and isolate it from any further use until deletion is possible.

- (a) Account information: We will retain and use your Personal Information as necessary to comply with our business requirements, legal obligations, resolve disputes, protect our assets, and enforce our agreements. Your account information is retained for as long as your account is active and a reasonable period thereafter in case you decide to re-activate your account. Where we retain information for Service improvement and development, we take steps to eliminate information that directly identifies you, and we only use the information to uncover collective insights about the use of our Services, not to specifically analyse personal characteristics about you.
- (b) Managed accounts: Where access to our Services is given by an organisation (e.g., your employer), your information is retained for as long as required by the administrator of your account. For more information, see "Managed accounts and administrators" above.
- (c) Marketing information: Where you have provided information to us about your marketing preferences, we keep such information for a reasonable time from the date you last expressed interest in our Services, such as when you last opened an email from us or ceased using your icetana account. Information derived from cookies and other tracking technologies in relation to your use of our Services is also retained for a reasonable period of time from the date such information was created.

#### 7 YOUR CHOICES AND RIGHTS

We welcome your enquiries and comments and encourage you to contact us to update your Personal Information if it changes. You may confirm if we are processing your Personal Information and request a copy of it. For your protection, however, we may require that you confirm your identity before we provide a copy of your Personal Information to you. You have a number of choices in how we deal with your Personal Information set out below.

### 7.1 Your choices

(a) Updating your information: You may update or correct your Personal Information by contacting us, or by amending your Personal Information connected to your profile on your account via our Services. You can update your profile information within your

profile settings and modify content that contains information about you using the editing tools associated with that content.

- (b) Deleting your information and deactivating your account: In some instances, you may request that we delete your Personal Information. In accordance with and subject to relevant privacy laws (including the GDPR), you may object to certain Personal Information being processed and request that processing of your Personal Information be limited. You can also remove certain profile information within your profile settings. Please note, however, that we may need to retain certain information for record keeping purposes, to complete transactions or to comply with our legal obligations.
- (c) Deactivating your account: If you no longer wish to use our Services, you or your administrator may be able to deactivate your Services account. If you can deactivate your own account, that setting is available to you in your account settings. Otherwise, please contact your administrator. Please note that deactivating your account does not mean your information is deleted. Your information remains visible to other Service users based on your past participation within the Services.
- (d) Opt out of certain communications: You may also limit or manage our communications with you by "unsubscribing" from certain email, newsletter and marketing updates or by updating your email preferences within your Service account settings menu. You should be aware that even after you opt out from receiving promotional messages from us, you will continue to receive transactional messages from us regarding our Services.
- (e) Withdrawing consent to share your information: Where you gave us consent to use your information for a limited purpose, you can contact us to withdraw that consent, but this will not affect any processing that has already taken place at the time.
- (f) Turn off Cookie Controls: Relevant browser-based cookie controls are described in our Cookies section above. Note if you turn off cookies, this may impact the some of the functionality of the Service.

If you choose to limit the Personal Information we process about you we may not be able to communicate with you or fulfil our Required Purposes outlined above. This may include limiting or ceasing your use of our Services, or otherwise ceasing to provide you with our Services. Further, if fulfilling a request in relation to amending or deleting your information would reveal information about another person, or if you ask to delete information which we or your administrator are permitted by law or have compelling legitimate interests to keep, we may not be able to fully meet your request. Where you have asked us to share data with third parties, for example, by installing third-party apps, you will need to contact those third-party service providers directly to have your information deleted or otherwise restricted.

Where you have requested us to manage your information in some way, we may need time to investigate and facilitate your request. If there is delay or dispute as to whether we have the right to continue using your information, we will restrict any further use of your information until the request is honoured or the dispute is resolved, provided your administrator does not object (where applicable).

Where the Services are administered for you by an administrator (see "Notice to End Users" below), you may need to contact your administrator to assist with your requests first. For all other requests, you may contact us using details listed at the start of this policy to request assistance.

For more information on how to manage your information, please contact us.

#### 7.2 Notice to End Users

Our products are intended for use by organisations. Where the Services are made available to you through an organisation (e.g. your employer), that organisation is the administrator of the Services and is responsible for the accounts and/or Service sites over which it has control. If this is the case, please direct your data privacy questions to your administrator, as your use of the Services is subject to that organisation's policies. We are not responsible for the privacy or security practices of an administrator's organisation, which may be different than this policy.

Service administrators are able to:

- (a) restrict, suspend or terminate your access to the Services;
- (b) access information in and about your account;
- (c) access or retain information stored as part of your account; and
- (d) install or uninstall third-party apps or other integrations.

Please contact your organisation or refer to your administrator's organisational policies for more information.

#### 8 OTHER IMPORTANT INFORMATION

#### 8.1 California Requirements

- (a) Exercising your rights: If you are a California resident, there are some additional rights that may be available to you under the California Consumer Protection Act ("CCPA"). This policy explains the tools that we have made available to you to exercise your data rights under the CCPA, such as the right to deletion and the right to request access to the categories of information we have collected about you. For more information on how to exercise your rights please visit the "How to access and control your information" section of this policy. We encourage you to manage your information, and to make use of the privacy controls we have included in our Services. You will not be discriminated against for exercising any of your privacy rights under the CCPA. In order to protect your information from unauthorized access or deletion, we may require you to provide additional information. If we cannot verify your identity, we will not provide or delete your information.
- (b) Sharing your personal information: We don't sell your personal information. We do share your information with others as described in the "Sharing the information we collect" section of this policy.
- (c) Processing your information: This policy describes the categories of personal information we may collect, the sources of that information, and our deletion and retention policies. We've also included information about how we may process your information, which includes for "business purposes" under the CCPA - such as to protect against illegal activities, and for the development of new products, features, and technologies. If you have questions about the categories of information we may collect about you, please be sure to visit the section of this policy called, "Collection and use of information." For more details about our processing activities, please be sure to visit the section called, "How we use information we collect." If you have any questions or would like to exercise your rights under the CCPA, you can reach out to us at info@icetana.ai.

#### 8.2 Personal Information of minors

Our Services are not designed for and are not marketed to people under the age of 16 ("**minors**").

We do not knowingly collect or solicit Personal Information from anyone under the age of 16 years of age or knowingly allow such persons to use our Services (including by registering an account). If we become aware that we have collected personal information from a person under the age of 16 years without parental consent, we will take all reasonable steps to delete that information.

Where our Services have been installed by an administrator of an organisation and the end users of that organisation could include minors, the administrator of that organisation is responsible for processing the minor information in accordance with the organisation's privacy policy and local legislation, including obtaining parental consent if required.

#### 8.3 **To find out more**

For more information about privacy in Australia and protecting your privacy, please visit the OAIC website at www.oaic.gov.au.

For more information about the EU GDPR, please contact the European Data Protection Supervisor, the European Union's independent data protection authority or visit their website at: https://edps.europa.eu/.

For more information about the UK GDPR, please contact the Information Commissioner's Office at: <u>Home | ICO</u>.

#### 9 CHANGES TO OUR PRIVACY POLICY

We may need to change this privacy policy from time to time. When we do amend it, the changes will be effective immediately upon being made public on our Website. <u>https://www.icetana.com/privacy-policy</u> We will use reasonable measures to notify you of any relevant changes to this privacy policy, but please be aware that it is your responsibility to review our privacy policy regularly and make sure you keep up to date with any changes. This Privacy Policy was last updated on 10 August 2022.

Use of our Website or the Services constitutes agreement with this privacy policy. If you disagree with any changes to this privacy policy, you will need to stop using the Website, the Services and deactivate your account(s), as outlined above.