

This Privacy Policy applies to every person you collect personal information from or about. It is compliant with the UK Data Protection Act and the General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR), applying to businesses (i) established in the UK and EU, (ii) which supply goods/services to the UK or EU or (iii) which monitor the activities of UK or EU residents. It should be available on each page of your website where you collect personal information (or each page footer) and anywhere else you collect personal information.

Your customers must expressly consent to the collection of their personal information by agreeing that they have read and agree to this Privacy Policy. Include the Privacy Policy in a hyperlink next to a click to accept box that states: "I have read and I understand this Privacy Policy, and I consent to the collection, use and disclosure of my personal information in accordance with this Privacy Policy."

Next to a second click to accept box, include a statement that: "I am over the age of 16 years or I am under the age of 16 years and I have obtained my parent or guardians' consent to provide my personal information in accordance with this Privacy Policy."

RBC GROUP– PRIVACY POLICY

This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or otherwise collected by us, offline or online, including through our services and this website (**Site**). In this Privacy Policy **we, us** or **our** means **RBC Group** and our related bodies corporate. When we collect, store and use your personal information, we do so in accordance with the rules set down in the Australian Privacy Act 1988 (Cth), the UK Data Protection Act and the General Data Protection Regulation (Regulation (EU) 2016/679).

Personal information

Personal information: The types of personal information or personal data we may collect about you include:

- your name;
- images of you;
- your contact details, including email address, mailing address, street address and/or telephone number;
- your age and/or date of birth;
- your credit card details;
- your demographic information, such as postcode;

- your preferences and/or opinions;
- information you provide to us through customer surveys;
- details of products and services we have provided to you and/or that you have enquired about, and our response to you;
- your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries, log data and/or browsing behaviour;
- information about your access and use of our Site, including through the use of Internet cookies, your communications with our Site, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider;
- additional personal information that you provide to us, directly or indirectly, through your use of our Site, associated applications, associated social media platforms and/or accounts from which you permit us to collect information; and
- any other personal information requested by us and/or provided by you or a third party.

We may collect these types of personal information and data directly from you or from third parties.

Collection and use of personal information

We may collect, hold, use and disclose personal information and personal data for the following purposes:

- to enable you to access and use our Site, services, associated applications and associated social media platforms;
- to contact and communicate with you;
- for internal record keeping and administrative purposes;
- for analytics, market research and business development, including to operate and improve our Site, associated applications and associated social media platforms;
- to run competitions and/or offer additional benefits to you;

- for advertising and marketing, including to send you promotional information about our products and services and information about third parties that we consider may be of interest to you;
- to comply with our legal obligations and resolve any disputes that we may have; and
- to consider your employment application.

Legal bases for processing (for UK and EU users):

If you are an individual in the UK or European Economic Area (EEA), we collect and process information about you only where we have legal bases for doing so under applicable United Kingdom or European Union laws. The legal bases depend on the services you use and how you use them. This means we collect and use your information only where:

- it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract;
- it satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote our services and to protect our legal rights and interests;
- you give us consent to do so for a specific purpose (for example we might ask for consent in order to provide you with our services, provide customer support and personalised features); or
- we need to process your data to comply with a legal obligation.

If you have consented to our use of information about you 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 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 our services.

Disclosure of personal information to third parties

We may disclose personal information and personal information to:

- third party service providers for the purpose of enabling them to provide their services, including (without limitation) IT service providers, data storage, web-hosting and server providers, debt collectors, maintenance or problem-solving providers, marketing or advertising providers, professional advisors and payment systems operators;

- our employees, contractors and/or related entities;
- our existing or potential agents or business partners;
- payment systems operators;
- sponsors or promoters of any competition we run;
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;
- credit reporting agencies, courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- courts, tribunals, regulatory authorities and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;
- third parties, including agents or sub-contractors, who assist us in providing information, products, services or direct marketing to you. This may include parties located, or that store data, outside of Australia including in the U.S.A.

When we refer to 'process' in this clause and this Privacy Policy in general, we mean any operation or set of operations which is performed on personal information, whether or not by automated means, such as collecting, recording, organising, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available personal information.

By providing us with personal information or Personal Data, you consent to the disclosure of your personal information and Personal Data to third parties who reside outside Australia and, if you are an individual located in the UK or EU, to third parties that reside outside the UK or EU.

Where the disclosure of your personal information is solely subject to Australian privacy laws (and not subject to the Data Protection Act or GDPR), you acknowledge that some third parties may not be regulated by the Privacy Act and the Australian Privacy Principles in the Privacy Act and if any such third party engages in any act or practice that contravenes the Australian Privacy Principles, it would not be accountable under the Privacy Act and you will not be able to seek redress under the Privacy Act and you acknowledge that we are not required to ensure that those third parties comply with Australian privacy laws.

Where the disclosure of your personal information is subject to Data Protection Act or GDPR, you acknowledge that there are risks if the third party outside the UK or EU engages in any act or practice that would contravene the Data Protection Act or GDPR and where there is no

adequacy decision in place with the country outside the UK or EU or appropriate safeguards in place with the third party.

How we treat personal information that is also sensitive information

Sensitive information is a sub-set of personal information that is given a higher level of protection under the Australian Privacy Principles. **Sensitive information** means information relating to your racial or ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation or practices, criminal records, health information or biometric information.

We will not collect sensitive information about you without first obtaining your consent.

Provided you consent, your sensitive information may only be used and disclosed for purposes relating to the primary purpose for which the sensitive information was collected.

Sensitive information may also be used or disclosed if required or authorised by law.

Our responsibilities as a 'controller' under the Data Protection Act and GDPR

Controllers are defined by the Data Protection Act and GDPR as natural or legal persons, a public authority, agency or other body to which personal information or personal data has been disclosed, whether via a third party or not, and who determines the purposes and means of processing personal information. In certain circumstances, we are a controller under the Data Protection Act and GDPR as we collect, use and store your personal data to enable us to provide you with our goods and/or services.

As a controller, we have certain obligations under the Data Protection Act and GDPR when collecting, storing and using the personal information of individuals based in the UK or EU. If you are an individual located in the UK or EU, your personal data will:

- be processed lawfully, fairly and in a transparent manner by us;
- only be collected for the specific purposes we have identified in the 'collection and use of personal information' clause above and personal information will not be further processed in a manner that is incompatible with the purposes we have identified;
- be collected in a way that is adequate, relevant and limited to what is necessary in relation to the purpose for which the personal information is processed;

- be kept up to date, where it is possible and within our control to do so (please let us know if you would like us to correct any of your personal information);
- be kept in a form which permits us to identify you, but only for so long as necessary for the purposes for which the personal data was collected;
- be processed securely and in a way that protects against unauthorised or unlawful processing and against accidental loss, destruction or damage.

We also apply these principles to the way we collect, store and use the personal information of our Australian customers or clients.

Specifically, we have the following measures in place, in accordance with the Data Protection Act and GDPR:

- **Data protection policies:** We have internal policies in place which set out where and how we collect personal information, how it is stored and where it goes after we get it, in order to protect your personal information.
- **Right to ask us to erase your personal information:** You may ask us to erase personal information we hold about you.
- **Right to ask us to restrict data processing:** You may ask us to limit the processing of your personal information where you believe that the personal information we hold about you is wrong (to give us enough time to verify if the information needs to be changed), or where processing data is unlawful and you request us to restrict the processing of personal information rather than it being erased.
- **Maintain Records of Processing Activities:** [Learn more about the automation log here.]
- **Notification of data breaches:** We will comply with the Data Protection Act and GDPR in respect of any data breach.

Commented [MA1]: A data controller's internal policies and practices could include:

- minimising the processing of personal data
- pseudonymising personal data as soon as possible
- transparency as to the functions and processing of personal data
- enabling the individual to monitor the data processing
- enabling the controller to create and improve security features.

Our responsibilities as a 'processor' under the Data Protection Act or GDPR

Where we are a processor, we have contracts containing certain prescribed terms in our contracts with controllers. Depending on the circumstances, we can be a controller or processor or controller and processor. In addition to:

- our contractual obligations with controllers (where we are solely a processor);
- and

- our legal obligations under the Data Protection Act or GDPR as a controller (where we are both a controller and processor) as a processor we also have the following responsibilities under the Data Protection Act and GDPR:
 - not to use a sub-processor without the prior written authorisation of the data controller;
 - to co-operate with the UK privacy commissioner;
 - to ensure the security of our data processing;
 - to keep records of processing activities;
 - to notify any personal data breaches to the data controller; and
 - to employ a data protection officer and appoint (in writing) a representative within the European Union if required by the Data Protection Act. (These are not required for the company at the present time).

How Long We Keep Your Personal Information

We keep your personal information only for as long as we need to and to the extent permitted by law. This time period may depend on what we are using your information for in accordance with this privacy policy. If your personal information is no longer required, we will delete it or make it anonymous by removing all details that identify you.

However, if necessary, we may retain your personal information for our compliance with a legal, accounting, or reporting obligation or for archiving purposes in the public interest, scientific, or historical research purposes or statistical purposes.

Children's Privacy

We do not aim any of our products or services directly at children under the age of 13, and we do not knowingly collect personal information about children under 13.

Your rights and controlling your personal information:

Choice and consent: Please read this Privacy Policy carefully. By providing personal information to us, you consent to us collecting, holding, using and disclosing your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us, however, if you do not, it may affect your use of this Site or the products and/or services offered on or through it.

Information from third parties: If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

Restrict: You may choose to restrict the collection or use of your personal information. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by contacting us using the details below. If you ask us to restrict how we process your personal information, we will let you know how the restriction affects your use of our Site or products and services.

Access: You may request details of the personal information that we hold about you. You may request a copy of the personal information we hold about you. Where possible, we will provide this information in CSV format or other easily readable machine format. You may request that we erase the personal information we hold about you at any time. You may also request that we transfer this personal information to another third party (data portability).

Correction: If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to correct any information found to be inaccurate, incomplete, misleading or out of date.

Complaints: If you believe that we have breached the Australian Privacy Principles or an article of the Data Protection Act or GDPR and wish to make a complaint, please contact us using the details below and provide us with full details of the alleged breach. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your complaint.

Unsubscribe: To unsubscribe from our e-mail database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

Storage and security

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

We cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk.

Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that the personal information we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

Cookies and web beacons

We may use cookies on our Site from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do allow third parties, such as Google and Facebook, to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. If and when you choose to provide our Site with personal information, this information may be linked to the data stored in the cookie.

We may use web beacons on our Site from time to time. Web beacons (also known as Clear GIFs) are small pieces of code placed on a web page to monitor the visitor's behaviour and collect data about the visitor's viewing of a web page. For example, web beacons can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page.

We may use Google Analytics to collect and process data. To find out how Google uses data when you use third party websites or applications, please see www.google.com/policies/privacy/partners/ or any other URL Google may use from time to time.

Links to other websites

Our Site may contain links to other websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

Amendments

We may, at any time and at our discretion, vary this Privacy Policy by publishing the amended Privacy Policy on our Site. We recommend you check our Site regularly to ensure you are aware of our current Privacy Policy.

For any questions or notices, please contact our Privacy Officer, Scott Holzberger, at:

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