

## PRIVACY POLICY

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are, and how and why we collect, store, use, and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use, and are responsible for certain personal information about you. When we do so, we are subject to various laws in Australia, the United States, and the General Data Protection Regulation, which applies across the European Union (including in the United Kingdom), and we are responsible as “controller” of that personal information for the purposes of those laws.

### 1. Key Terms

It would be helpful to start by explaining some key terms used in this policy:

- **We, us, our means** Values Identifier powered by Valuegraphics, LLC.
- **Our data protection officer** means our officer who can be contacted at [admin@valuesidentifier.com](mailto:admin@valuesidentifier.com).
- **Personal information** means any information relating to an identified or identifiable individual.
- **Special category personal information** means personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership, genetic and biometric data, and data concerning health, sex life, or sexual orientation.

### 2. Personal Information We Collect About You

- (a) We may collect and use the following personal information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household:

<b>Categories of Personal Information</b>	<b>Specific Types of Personal Information Collected</b>
1. Identifiers 2. Characteristics of protected classifications under California or federal law 3. Inferences 4. Internet or other electronic network activity information.	1. Email Address 2. First Name 3. Last Name 4. Age range 5. Gender identity 6. Answers to assessment questions

- (b) This personal information is required to provide our services to you. If you do not provide personal information we ask for, it may delay or prevent us from providing our services to you.

### 3. How Your Personal Information is Collected

We collect most of this personal information directly from you—in person, by telephone, text, email, and via our website. However, we may also collect information:

- From publicly accessible sources;
- Directly from a third party (e.g., the authentication provider for the website);
- From a third party with your consent (e.g., your bank);
- Via our IT systems, including:
  - Automated monitoring of our websites and other technical systems, such as our computer networks and connections, communications systems, email and instant messaging systems; and
  - Other IT systems we may implement from time to time.

### 4. How and Why We Use Your Personal Information

- (a) Under data protection law, we can only use your personal information if we have a proper reason for doing so, for instance:
- To comply with our legal and regulatory obligations;
  - For the performance of our contract with you or to take steps at your request before entering into a contract;
  - For our legitimate interests or those of a third party; or
  - Where you have given consent.
- (b) A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.
- (c) The table below explains what we use (process) your personal information for and our reasons for doing so:

<b>What we use your personal information for:</b>	<b>Our reasons:</b>
To provide the Values Identifier to you.	Your responses to the Values Identifier enable us to provide you with the innovative analysis that our service requires.

<p>To prevent and detect fraud against you or Values Identifier powered by Valuegraphics, LLC.</p>	<p>For our legitimate interests or those of a third party, i.e. to minimize fraud that could be damaging for you and us.</p>
<p>Conducting checks to identify our customers and verify their identity. Screening for financial and other sanctions or embargoes. Other processing necessary to comply with professional, legal, and regulatory obligations that apply to our business.</p>	<p>To comply with our legal and regulatory obligations.</p>
<p>Gathering and providing information required by or relating to audits, inquiries, or investigations by regulatory bodies.</p>	<p>To comply with our legal and regulatory obligations.</p>
<p>Ensuring business policies are adhered to, e.g., policies covering security and internet use.</p>	<p>For our legitimate interests or those of a third party, i.e., to ensure we are following our internal procedures so we can deliver the best service to you.</p>
<p>Operational reasons, such as improving efficiency, training, and quality control.</p>	<p>For our legitimate interests or those of a third party, i.e., to be as efficient as we can so we can deliver the best service for you at the best price.</p>
<p>Ensuring the confidentiality of commercially sensitive information.</p>	<p>For our legitimate interests or those of a third party, i.e., to protect trade secrets and other commercially valuable information. To comply with our legal and regulatory obligations.</p>
<p>Statistical analysis to help us manage our business, such as in relation to our financial performance, customer base, product range or other efficiency measures.</p>	<p>For our legitimate interests or those of a third party, i.e., to be as efficient as we can so we can deliver the best service for you at the best price.</p>
<p>Preventing unauthorized access and modifications to systems.</p>	<p>For our legitimate interests or those of a third party, i.e., to prevent and detect criminal activity that could be damaging for us and for you. To comply with our legal and regulatory obligations.</p>

<p>Updating and enhancing customer records.</p>	<p>For the performance of our contract with you or to take steps at your request before entering into a contract.</p> <p>To comply with our legal and regulatory obligations.</p> <p>For our legitimate interests or those of a third party, e.g., making sure that we can keep in touch with our customers about existing orders and new products.</p>
<p>Statutory returns.</p>	<p>To comply with our legal and regulatory obligations.</p>
<p>Ensuring safe working practices, staff administration, and assessments.</p>	<p>To comply with our legal and regulatory obligations.</p> <p>For our legitimate interests or those of a third party, e.g., to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you.</p>
<p>Marketing our services and those of selected third parties to:</p> <ul style="list-style-type: none"> <li>—existing and former customers;</li> <li>—third parties who have previously expressed an interest in our services;</li> <li>—third parties with whom we have had no previous dealings.</li> </ul>	<p>For our legitimate interests or those of a third party, i.e., to promote our business to existing and former customers.</p>
<p>External audits and quality checks.</p>	<p>For our legitimate interests or those of a third party, i.e., to maintain our accreditations so we can demonstrate we operate at the highest standards.</p> <p>To comply with our legal and regulatory obligations.</p>

The above table does not apply to special category personal information, which we will only process with your explicit consent.

## 5. Promotional Communications

- (a) We may use your personal information to send you updates (by email, text

message, telephone, or post) about our services, including exclusive offers, promotions, or new features.

- (b) We have a legitimate interest in processing your personal information for promotional purposes (see above “How and why we use your personal information”). We do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.
- (c) We will always treat your personal information with the utmost respect and never sell or share it with other organizations for marketing purposes.
- (d) You have the right to opt out of receiving promotional communications at any time by:
  - Contacting us at [admin@valuesidentifier.com](mailto:admin@valuesidentifier.com); or
  - Using the “unsubscribe” link in emails or “STOP” number in texts.
- (e) We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

## **6. Who We Share Your Personal Information With**

- (a) We routinely share personal information with:
  - Service providers we use to help deliver our services to you, such as payment service providers and authentication providers;
  - Our insurers and brokers;
  - Our bank(s).
- (b) We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they can only use your personal information to provide services to us and to you. We may also share personal information with external auditors, e.g., in relation to ISO or Investors in People accreditation and the audit of our accounts.
- (c) We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.
- (d) We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. We will typically anonymize the information, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

## **7. Personal Information We Sold or Disclosed for a Business Purpose**

- (a) In the preceding 12 months, we have disclosed for a business purpose to one or more third parties the following categories of personal information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household:
- Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers);
  - Information that identifies, relates to, describes, or is capable of being associated with a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information;
  - Characteristics of protected classifications under California or United States federal law;
  - Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies);
  - Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement);
  - Professional or employment-related information; and
  - Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

## **8. Where Your Personal Information is Held**

- (a) Information may be held at our offices and those of our third-party agencies, service providers, representatives, and agents as described above (see above: "Who We Share Your Personal Information with").
- (b) Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal information

when this occurs, see below: “Transferring Your Personal Information Out of the EEA”.

## **9. How Long Your Personal Information Will Be Kept**

- (a) We will keep your personal information while you have an account with us or while we are providing our services to you. Thereafter, we will keep your personal information for as long as is necessary:
  - To respond to any questions, complaints, or claims made by you or on your behalf;
  - To show that we treated you fairly; or
  - To keep records required by law.
- (b) We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply to different types of personal information.

## **10. Hosting and International Data Transfers**

- (a) Information that we collect may, from time to time, be stored, processed in, or transferred between parties or sites located in different countries around the world. These may include, but are not limited to Australia, New Zealand, India, Canada and The United States of America.
- (b) We and our other group companies have offices and/or facilities in Australia, New Zealand, India, Canada, and The United States of America. Transfers to each of these countries will be protected by appropriate safeguards; these include one or more of the following: the use of standard data protection clauses adopted or approved by the European Commission, which you can obtain from the European Commission Website; the use of binding corporate rules, a copy of which you can obtain from Values Identifier powered by Valuegraphics, LLC's Data Protection Officer.
- (c) Our website's hosting facilities are in The United States of America. Transfers to each of these Countries will be protected by appropriate safeguards, these include one or more of the following: the use of standard data protection clauses adopted or approved by the European Commission which you can obtain from the European Commission Website; the use of binding corporate rules, a copy of which you can obtain from Values Identifier powered by Valuegraphics, LLC's Data Protection Officer.
- (d) Our Suppliers and Contractors are situated in Australia, New Zealand, India, Canada, and The United States of America. Transfers to each of these Countries will be protected by appropriate safeguards; these include one or more of the

following: the use of standard data protection clauses adopted or approved by the European Commission, which you can obtain from the European Commission Website; the use of binding corporate rules, a copy of which you can obtain from Values Identifier powered by Valuegraphics, LLC's Data Protection Officer.

- (e) You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

## 11. Your Rights under the GDPR

- **Right to Access:** the right to be provided with a copy of your personal information (the right of access).
- **Right to Rectification:** the right to require us to correct any mistakes in your personal information.
- **Right to be Forgotten:** the right to require us to delete your personal information—in certain situations.
- **Right to Restriction of Processing:** the right to require us to restrict the processing of your personal information—in certain circumstances, e.g., if you contest the accuracy of the data.
- **Right to Data Portability:** the right to receive the personal information you provided to us in a structured, commonly used, and machine-readable format and/or transmit that data to a third party—in certain situations.
- **Right to Object:** the right to object:
  - at any time to your personal information being processed for direct marketing (including profiling);
  - in certain other situations to our continued processing of your personal information, e.g., processing carried out for the purpose of our legitimate interests.
- **Right Not to be Subject to Automated Individual Decision-Making:** the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.

For further information on each of those rights, including the circumstances in which they apply, see the guidance from the UK Information Commissioner's Office (ICO) on individual rights under the General Data Protection Regulation.

## 12. Your Rights Under the CCPA

You have the right under the California Consumer Privacy Act of 2018 (CCPA) and certain other privacy and data protection laws, as applicable, to exercise free of charge:



- **Disclosure of Personal Information We Collect About You**

You have the right to know:

- The categories of personal information we have collected about you;
- The categories of sources from which the personal information is collected;
- Our business or commercial purpose for collecting or selling personal information;
- The categories of third parties with whom we share personal information, if any; and
- The specific pieces of personal information we have collected about you.

Please note that we are not required to:

- Retain any personal information about you that was collected for a single, one-time transaction if, in the ordinary course of business, that information about you is not retained;
- Reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered personal information; or
- Provide personal information to you more than twice in a 12-month period.

- **Personal Information Sold or Used for a Business Purpose**

In connection with any personal information, we may sell or disclose to a third party for a business purpose, you have the right to know the following:

- The categories of personal information about you that we sold and the categories of third parties to whom the personal information was sold; and
- The categories of personal information that we disclosed about you for a business purpose.

You have the right under the California Consumer Privacy Act of 2018 (CCPA) and certain other privacy and data protection laws, as applicable, to opt-out of the sale or disclosure of your personal information. If you exercise your right to opt out of the sale or disclosure of your personal information, we will refrain from selling your personal information unless you subsequently provide express authorization for the sale of your personal information.

We do not sell your personal information to any third parties.

- **Right to Deletion**

Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:

- Delete your personal information from our records; and
- Direct any service providers to delete your personal information from their records.

Please note that we may not delete your personal information if it is necessary to:

- Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with United States federal law, and provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us;
  - Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
  - Debug to identify and repair errors that impair existing intended functionality;
  - Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;
  - Comply with the California Electronic Communications Privacy Act;
  - Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent;
  - Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us;
  - Comply with an existing legal obligation; or
  - Otherwise, use your personal information internally in a lawful manner that is compatible with the context in which you provided the information.
- **Protection Against Discrimination**

You have the right to not be discriminated against by us because you exercised any of your rights under the CCPA. This means we cannot, among other things:

    - Deny goods or services to you;
    - Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
    - Provide a different level or quality of goods or services to you; or
    - Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

Please note that we may charge a different price or rate or provide a different level or quality to you, if that difference is reasonably related to the value provided to our business by your personal information.

### **13. Keeping Your Personal Information Secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost, used, or accessed in an unauthorized way. We limit access to your

personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

#### **14. How to Exercise Your Rights**

- (a) If you would like to exercise any of your rights as described in this Privacy Policy, please email us at [admin@valuesidentifier.com](mailto:admin@valuesidentifier.com). Please note that you may only make a CCPA- related data access or data portability disclosure request twice within a 12-month period. If you choose to contact us directly by email, you will need to provide us with:
- Enough information to identify you (e.g., your full name, address, and customer or matter reference number);
  - Proof of your identity and address (e.g., a copy of your driving license or passport and a recent utility or credit card bill); and
  - A description of what right you want to exercise and the information to which your request relates.
- (b) We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected information or is someone authorized to act on such person's behalf.
- (c) Any personal information we collect from you to verify your identity in connection with your request will be used solely for verification.

#### **15. How to File a GDPR Complaint**

We hope that our Data Protection Officer can resolve any query or concern you raise about our use of your information.

The General Data Protection Regulation also gives you the right to lodge a complaint with a supervisory authority in the European Union (or European Economic Area) state where you work, normally live, or where any alleged infringement of data protection laws occurred.

#### **16. Changes to This Privacy Notice**

This privacy notice was published on 03 September 2024 and last updated on 03 September 2024.

We may change this privacy notice from time to time, and when we do, we will email you to inform you.

## **17. How to Contact Us**

Please contact us or our Data Protection Officer if you have any questions about this privacy policy or the information we hold about you.

We may be contacted at [admin@valuesidentifier.com](mailto:admin@valuesidentifier.com). Our Data Protection Officer may be contacted at [admin@valuesidentifier.com](mailto:admin@valuesidentifier.com).

## **18. Do You Need Extra Help?**

If you would like this notice in another format (for example, audio, large print, or braille), please contact us (see “How to contact us” above).