

# Privacy Policy

**Effective date: 1 April 2019**

FEETS allows users within the same organisation that they are part of to collaborate, share and discover work information more effectively. This Privacy Policy describes how and when your information is collected, used and shared when you, your colleagues, business associates or other users use the FEETS platform (which includes the FEETS websites, apps and related online services that link to this Privacy Policy, which we call the "Services"). This Privacy Policy applies to your use of the Services.

If you have joined FEETS using an email address, phone number or any other credential that is not owned by a Business, but have shared content within a Business community (including all data shared in groups within that Business community and in FEETS Chat), then the Business will have access to and control over all data submitted or provided through the Services within that Business group. This will include all files and communications previously shared and that you may share in the future including FEETS Chat.

Please ensure that you have all necessary consents and permissions before you post any information about other users of the Services or your Business on FEETS.

## **What kinds of information do we collect?**

Information you and others provide. We may collect the following kinds of information from and about you:

- the content and other information you provide when you use our Services, including when you sign up for an account, create or share, and message or communicate with others. This can include information in or about the content you provide, such as the date a file was created. We also collect information about how you use our Services, such as the types of content that you view or engage with or the frequency and duration of your activities;
- contact information, such as full name and email address, and any contact information related to you.
- work title, department information, reporting structures and other information related to your work or Business;
- communications and information that other people provide when they use the Services. This can include information about you, such as when others share or comment on a photo of you, send a message to you or upload, sync or import your contact information;
- the content of all communications on or through the Services;
- user communications, feedback, suggestions and ideas sent to us, or any other information that you provide to us when you or your Business contact or engage us for support regarding the Services;
- information about the people and groups that you are connected to and how you interact with them, such as the people you communicate with the most or the groups you like to share with; and

- any other information that you choose to upload, share with other users or provide to us directly through the Services.

### **How do we use the information we collect?**

FEETS will use the information that we collect to provide, develop, improve and monetise the Services. Examples of such use include:

- communicating with users regarding their use of the Services;
- enhancing and promoting the security, integrity and safety of the Services for you and other users;
- operating, maintaining and improving the systems and infrastructure that provide the Services. For example, we may use crash logs from your use of the Services to identify and fix bugs;
- personalising and customising your experiences as part of our provision of the Services, including presenting you with content, communications or topics (including paid content) that you may be interested in or that are popular or trending within your Business community;
- developing new tools, products or services that we may introduce, which may develop and enrich your experience over time;
- sending you marketing communications, communicating with you about our Services and letting you know about our policies and terms. We also use your information to respond to you when you contact us; and
- conducting data and system analytics, including research to improve the Services.

### **What is our legal basis for processing data?**

We collect, use and share the data that we have in the ways described above:

- as necessary to fulfil our Terms of Service;
- as necessary to comply with our legal obligations; and
- as necessary for our (or others') legitimate interests, including our interests in providing an innovative, personalised, safe and profitable Service to our users and partners, unless those interests are overridden by your interests or fundamental rights and freedoms that require protection of personal data.

### **Data retention, account deactivation and deletion**

We store data until it is no longer necessary to provide our Services or until your account is deleted – whichever comes first. This is a case-by-case determination that depends on things such as the nature of the data, why it is collected and processed, and relevant legal or operational retention needs.

**How will we notify you of changes to this policy?**

We may update this Privacy Policy from time to time. When we update the Privacy Policy, we will provide appropriate notice to you, revise the "Effective date" date above and post the new Privacy Policy.