

# **Privacy Policy**

# INTRODUCTION

The Start Group Pty Ltd hosts provides products and services remotely, on-premise, in the cloud, and privately hosted, to support our customer's businesses and operations. Our products and services typically collect information to provide their required benefits. When you use our products and services you are trusting us with your information. This policy describes the information we collect, why we collect it, and who we share it with. For details on data security, please refer to our Information Security Policy.

### Scope

This policy applies to our business functions, our websites, our services, and our products.

# TYPES OF INFORMATION

We collect information to provide better services to all of our customers. This may include:

- Email addresses, phone numbers, and contact information, so that we may provide support, assistance, and information when needed.
- Login user names and account relationships, so that when you login to our products you access the appropriate portions of the products and data which are suitable for you.
- Website selections, so that your selected preferences will be retained for the next time you access the system, resulting in an improved user experience.
- Email and verbal content, so that we may reference a correspondence history when providing support and information to you.

We do <u>not</u> store user passwords in our systems. When online accounts are created for users (based on their email address) for our products and services, and they nominate a password, an obfuscated equivalent code is generated which allows us to authenticate login credentials, however the plain-text password itself is not stored on our servers. Your password is not visible, nor accessible to any of our staff.

## Your apps, browsers, and devices

We may collect information about the applications, browsers, and devices you are using to access our products and services. This helps us provide support, features, and updates to improve your experience with our products and services.

Your browsers and devices may collect and store information about your use of our products and services in Cookies. This is a standard process in web-browser applications and allows the browser to retain information which improves your user experience. You can clear your browser history and cookies at any time using standard features available within your browser application.

# **Products**

Many of our products store customer information, most of which is business information but which may contain personnel details. This may include business sensitive information pertaining to operations, staff, budgets,

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forecasts, planning, and other activities, as well as photos, videos, files, and other documents uploaded to our products. This data is typically stored in dedicated, customer-specific databases.

Our products may also store user-controlled content to retain information in preparation for the next time you use our products. This includes personal favorites, settings, selections, key-strokes, and other data entry types of information, and typically does not include personal information.

## **Customer On-Premise Systems**

Information which is stored in on-premise deployments of our Products is typically stored within our customer's own infrastructure, and it is the responsibility of our customers to ensure appropriate data security including backups, encryption, and firewalling.

Backups from customer systems may be sent to our staff to assist with diagnostics, support, trouble-shooting, and other purposes.

# **Private Cloud-Hosted Systems**

Information which is stored in private-cloud hosted deployments of our Products is typically stored within our customer's own cloud infrastructure, and it is the responsibility of our customers to ensure appropriate data security including backups, encryption, and firewalling.

Backups from customer hosted systems may be sent to our staff to assist with diagnostics, support, trouble-shooting, and other purposes.

## SaaS Cloud-Hosted Systems

Information which is stored in SaaS hosted cloud deployments of our Products is stored within Microsoft's Azure infrastructure. Our Information Security Policy describes the levels of security, encryption-at-rest, encryption-intransit, backups, and other details pertaining to data security and isolation.

SaaS hosted systems deploy dedicated, customer-specific databases to store information, and do not store data for multiple customers in the same repositories.

Backups from SaaS systems are not accessible by staff, other than those authorised to maintain and support those specific customers, and are not stored in our internal networks or systems. Data repositories and backups are retained in the Microsoft Azure landscape, and we rely on Microsoft's technologies, security, and systems to keep those items safe.

## **Emails and Correspondence**

Written and verbal correspondence may be stored in our own, or 3<sup>rd</sup> party systems (such as Office 365).

#### Files and Documents

Our products and systems support the upload, download, storage, and backup of files, photos, videos, and other documents.

#### Staff

Our staff have access to the information collected above, to allow them to contact and support you in relation to your interest or use of our products and services.

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#### Sensitive Information

Information is considered 'sensitive' if it has, or should have, an official government classification (for example UNCLASSIFIED DLM (OFFICIAL), PROTECTED, SECRET or TOP SECRET), or if the information has commercial or privacy-related implications for the Company, Staff or customers.

#### **Examples of Sensitive Information:**

- Implementation details for Company Products and services (e.g. source code and programming strategies);
- Corporate processes and procedures, financial information, including charge rates, salaries, bids, overhead
  costs:
- Information owned by a customer or used in providing a service, including products, architectures, services provided, user accounts, unless permission is granted by the customer for publication;
- Identification information such as a person's name, address, or date of birth.

## **Business-Sensitive Information**

We consider all information collected to be 'business-sensitive' when it pertains to customer operations, performance, efficiency, productivity, activities, personnel, inventory, assets, financials, and other business activities. This typically includes all information which is manually entered, or automatically collected by our products.

Business-Sensitive information is typically stored in dedicated, customer-specific databases (as opposed to multi-tenant databases), including in our SaaS Cloud offerings. These databases are only accessible by specifically authorized staff in the context of their roles in the organisation, and is never shared with other entities without specific authorization from our customers.

# USF OF INFORMATION

We use the information we collect to deliver our services to you. This is typically your own information republished back to you or your business with additional context or analysis to provide business benefit. The information we collect which we consider business-sensitive, is tightly controlled and only made available to personnel within your business who have been allocated appropriate permissions to access that information.

We the information we collect to analyse user experience, performance, frequency, and dominant use so that we can improve our products and services, and develop new products and services.

We use the information we collect to provide a personalised experience to our users, with content, dashboards, selections, and filters retained for ease-of-access during subsequent interactions with our products and services.

We use the information we collect to market products, features, capabilities, and services to you, and the general market.

#### Access to Information

You and your business have a right to access the information we have collected about you and your business. Business-Sensitive information is only shared with authorised business personnel, and our staff for the purposes of supporting and maintaining the products and services which you are using.

Some information is not accessible by our staff as it is stored on your devices in the form of cookies and other items.

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## Confidentiality

Our staff are all signatories to a Non-Disclosure Agreement (NDA), which covers all Business-Sensitive and Sensitive information. In addition, our company regularly signs explicit NDAs with our customers in relation to specific information, projects, or initiatives, and which are encompassed by our staff NDA obligations.

# 3<sup>rd</sup> Parties

Our company has relationships with a variety of other parties, both formal and informal, including but not limited to Sales Partners, Distribution Channels, Integration Partners, and Contractors. General information may be shared with these partners, however Business-Sensitive and Sensitive Information is never shared with any 3<sup>rd</sup> party entities without express permission from our customers, except when contractors are performing works for those customers (either directly or through us), and where the contractor has signed an NDA pertaining to that information.

## Summary

The Start Group Pty Ltd takes a strong approach to information privacy, and understands our duty-of-care in regards our customers business operations, commercials, and intellectual property. We believe in following best practice security guidelines in all aspects of the work we do. We believe that it is our duty of care to provide our staff and our clients with the most sensible, secure systems possible. Over fifteen years of operations, we have never experienced an information security breach, virus intrusion, nor any customer data loss. Strict adherence to our software design principles, engineering practices, and security policies will ensure we continue to deliver strong outcomes for our customers, and ourselves. Ongoing adherence to this privacy policy will continue to ensure our customer's business-sensitive information is retained solely for their benefit, while other information will allow us to continue to build and improve the products and services which we deliver to you.