

# Krunchbox Privacy Policy

Krunchbox Operations Pty Ltd (ACN 126 243 114) ("Krunchbox" or "we") is committed to protecting your privacy. This policy lets you know how we collect, use and handle your Personal Information and describes our practices regarding personal information collected.

## Personal and Other Information We Collect

We collect personal and other information which we require for our legitimate business interests. Through your interaction with us, Krunchbox may collect your **Personal Information**. The Personal Information we collect may include, but is not limited to:

1. Your name
2. Address
3. Telephone number
4. e-mail address
5. Your IP address
6. Publicly available information
7. Credit Card details
8. information required to consider your job application such as your education and employment history. In this case the information may have been provided by a recruiter.

Krunchbox may also collect **Other Information** through your interaction with us, which does not reveal your specific identity or does not directly relate to an individual. Other Information may include, but is not limited to:

1. Browser and device information
2. Data collected through automated electronic interactions
3. Application usage data
4. Demographic information
5. Geographic or geo-location information
6. Statistical and aggregated information.

Statistical or aggregated information does not directly identify a specific person, but it may be derived from Personal Information. For example, we may aggregate de-identified information to calculate the percentage of users in a particular post code.

In some instances, we may combine Other Information with Personal Information, such as combining a precise geographical location with your name. If we combine Other Information with Personal Information, we will treat the combined information as Personal Information.

## How We Collect Information

Krunchbox may collect both Personal Information and Other Information from a variety of sources:

- **Direct Interactions:** From your use of and interaction with us through the website ([www.krunchbox.com](http://www.krunchbox.com)) and our other business activities such as account creation, submission of registrations and forms, correspondence, sales inquiries and transactions, applications for a job or contract role or if you visit our premises.
- **Publicly Available Data / Data from Third Parties:** Data from Automated Interactions on non-Krunchbox websites, or other data you may have made publicly available, such as social media posts,

Linked In postings or data provided by third party sources, such as marketing opt-in lists, or data aggregators.

- **Automated Interactions:** From the use of technologies such as electronic communication protocols, cookies, embedded URLs or pixels, or widgets, buttons and tools.
- **Indirect collections:** your employer (our customer) or our third party service providers may provide us with your information; we may buy a list or obtain information from trade show directories; recruiters may refer your details to us.

Although Krunchbox's use of Automated Interactions may change over time as technology evolves, the following descriptions are designed to provide you with additional detail about Krunchbox's current approach to information collected from Automated Interactions.

**Electronic Communications Protocols:** As is true when you visit most websites and apps, Krunchbox may automatically receive information from you as part of the communication connection itself, which often consists of network routing information (where you came from), equipment information (browser type), your IP address (which may identify your general geographic location or company), and date and time.

Krunchbox may also automatically receive and record information about your interaction with the website, such as clickstream information (when each Krunchbox webpage was visited and how much time was spent on the page), or general geo-location data.

**Cookies:** Krunchbox's server will query your browser to see if there are "cookies" previously set by our website. A cookie is a small piece of information sent by a Web server to store on a Web browser so it can later be read back from that browser. Cookies may collect information, including a unique identifier, user preferences, profile information, general usage and volume statistical information. Cookies may also be used to collect individualized web site use data, provide content personalization, or conduct and measure the effectiveness of advertising in accordance with this Policy. Some cookies may remain on users' computers after they leave the Website. While the majority are set to expire within 1-24 months of your last visit to the Krunchbox website, others may not expire because of their nature, like cookies that remember opt-out preferences.

Your browser may provide you with information and control over cookies. You can set your browser to alert you when a cookie is being used, and accept or reject the cookie. You can also set your browser to refuse all cookies or accept only cookies returned to the originating servers. Users can generally disable the cookie feature on their browser without affecting their ability to use the site, except in some cases where cookies are used as an essential security feature necessary for transaction completion. Cookies, however, are important to the proper functioning of a site, and disabling them may degrade your experience and interfere with Web site features and customizations.

**Managing Cookie Preferences:** You may access or change your cookie preferences at any time.

**Embedded Pixels and Similar Technologies:** Krunchbox and its service providers may use embedded pixel technologies for the purposes of identifying unique user visits (as opposed to aggregate hits), and for advertising purposes. In addition, embedded pixels or other technologies may be used in e-mails and our online display advertising to provide information on when the e-mail or ad was opened to track marketing campaign responsiveness; information collected using these technologies may be associated with the recipient's e-mail address.

**Physical Location:** We may collect the physical location of your device and use it to provide you with personalized location-based services or content. In some instances, you may be permitted to allow or deny such use of your device's location, but if you choose to deny such use, we may not be able to provide you with the applicable personalized services or content

You are not obliged to provide your Personal Information to us. However, if you do not, we may be unable to communicate with you, respond to you in a way you would expect and Krunchbox may not be able to provide its services to your employer.

## How We Use Personal Information

Krunchbox uses the Personal Information it collects (unless otherwise restricted by applicable law), to:

**Engage in Transactions.** To enable us to engage with you or your employer where you are a user or administrator for your employing organisation.

**Process Transactions.** To process payments and transactions relating to your employing organisation's use of the Krunchbox service.

**Provide Support or Other Services.** To provide support or other services, as well as product updates, product patches and fixes and other similar operational communications.

**Automated notifications.** To provide you with automated notifications e.g. weekly updated data notifications. As a user you have the ability to opt out of such communications at any time. If you do so, your employing organisation may not receive these communications.

**Tailor Marketing to Your Needs and Respond to Your Requests.** To notify you about service developments, to advertise Krunchbox's services in accordance and other direct marketing purposes. Your website visit, marketing experience, and communications may be tailored to your interests based on your Personal Information. Krunchbox may also use Personal Information in order to respond directly to your information requests.

**Interact with You on Third Party Social Networks.** To interact with you on third party social networks. Krunchbox's interactions with you on a third party social network are subject to that network's privacy policies and terms of use.

**Post Testimonials.** To post testimonials on our Website. Prior to posting a testimonial, we will obtain your consent to use your name and testimonial.

**Select Content, Improve Quality and Facilitate Use.** To help create and personalize content on our website, facilitate your use of the website (for example, to facilitate navigation and the login process, avoid duplicate data entry and enhance security), improve quality, and evaluate response rates.

**Improve Products, Services, and Experiences.** To evaluate and improve our services, marketing, and customer relationships.

## How We Disclose Personal Information

Krunchbox discloses Personal Information it collects (unless otherwise restricted by applicable law), to:

**Obtain Third Party Services.** third parties who provide services to Krunchbox, such as financial institutions, analytics, web site management, information technology and related infrastructure provision, customer service, e-mail delivery, billing, auditing, and other similar services. When Krunchbox shares Personal Information with third party service providers, we require that they use your Personal Information only for the purpose of providing services to us and subject to terms consistent with this Policy.

**Protect our Employees, Sites, Facilities, and Operations.** to protect the health and safety of our employees and visitors or our physical and online operations.

**Consider your application for employment or a contracting role.** to consider your suitability for a job or contract with us, including to check your background, to on-board you if you are successful and to comply with our legal obligations as an employer.

**Comply with Legal Requirements and Corporate Transactions.** if we believe it is necessary or appropriate:

(a) Under applicable law, including laws outside your country of residence;

(b) To comply with legal process;

(c) To respond to requests from public and government authorities, including public and government authorities outside your country of residence;

(d) To enforce our terms and conditions; and

(e) To allow us to pursue available remedies or limit the damages that we may sustain.

(f) To a third party involved in a transaction or proceedings, in the event of a reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or shares (including in connection with any bankruptcy or similar proceedings).

## **Other Information**

We may use, transfer, and disclose Other Information we collect (which does not identify you) for any purpose, except where applicable law requires otherwise. If we are required to treat Other Information as Personal Information under applicable law, then we will only use it in the same way that we are permitted to use and disclose Personal Information.

## **Retention**

Krunchbox will retain your Personal Information for as long as your account is active; as needed to provide the Krunchbox service; as needed for the purposes outlined in this policy or at the time of collection; as necessary to comply with our legal obligations or exercise our legal rights, to resolve disputes or in accordance with applicable law.

## **Security**

Personal Information is held in our electronic databases and in some cases in hard copy. Our databases and systems are hosted by a third party service provider in Australia.

The security of your Personal Information is very important to Krunchbox. We have implemented appropriate technical and organisational security measures to protect your Personal Information. Physical, electronic, and administrative safeguards are used that are designed to protect your Personal Information from loss, misuse and unauthorized or unlawful access or disclosure, alteration and destruction. However, as the transmission of data over the internet is not totally secure, we cannot guarantee the security of your data during transmission.

In addition, standard security protocols and mechanisms are used to exchange the transmission of data such as credit card details. If you are required to enter a credit card number on our site, we will encrypt it using secure socket layer (SSL) technology.

## **Sensitive Information**

We ask you not to send us any sensitive Personal Information (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background or trade union membership).

## **Children's Privacy**

As a company focused on serving the needs of businesses Krunchbox is not directed to minors and Krunchbox does not promote or market its services to minors.

## **Overseas Disclosure**

We collect your Personal Information in Australia. Krunchbox may disclose your personal information to organisations overseas. This will include other Krunchbox entities. Overseas recipients are likely to be located in New Zealand, Singapore, the United States of America, Canada or the United Kingdom.

## **For EU individuals only**

The EU General Data Protection Regulation (**GDPR**) may apply to you if you are located in the EU or EEA. "Personal Information" is referred to as "Personal Data" in the GDPR. We collect and will handle it as set out in this policy and in accordance with the GDPR. Your Personal Data will only be processed as set out in this policy. The lawful bases we rely on for processing your Personal Data are either that:

- (a) we have obtained your prior consent to the processing (and you can withdraw your consent at any time);
- (b) we are processing the data for our legitimate interests in carrying out our business activities as disclosed in this policy such as to communicate with you, to provide our services to your employer organization, to consider an application for a job or contract role if you have applied to us, to provide support or to fulfil our compliance obligations; or
- (c) we are complying with a legal obligation or requirement.

Under the GDPR you have certain rights as a data subject. These rights are:

- not to provide your Personal Data to us (but note that we may be unable to provide you (or your employer) with the full benefit of our website or our services)
- to request access to or copies of your Personal Data and information about the nature, processing and disclosure of your Personal Data
- the right to request rectification of any inaccuracies
- the right to request on legitimate grounds, erasure of your Personal Data (the right to be forgotten) or restriction of processing of your Personal Data
- the right to have certain Personal Data transferred to another controller (right of portability)
- the right to lodge complaints with a data protection authority about our processing of your Personal Data.

**Right to object:** You may object to Krunchbox processing your Personal Data (including for direct marketing purposes) and we will cease such processing.

We will not transfer your Personal Data overseas without your consent or otherwise complying with the GDPR.

You are not obliged to provide your Personal Data to us. However, if you do not, we may be unable to communicate with you, respond to you in a way you would expect and Krunchbox may not be able to provide its services to your employer.

### **Complaints**

If you have any complaints regarding our compliance with this policy or the privacy laws, you should first contact us using the details below. We will investigate and attempt to resolve your complaint in a reasonable time usually 30 days.

If you have unresolved concerns, you may have the right to complain to the Office of the Australian Information Commissioner in Australia or to a data protection authority in another jurisdiction.

### **For Access or Correction Contact Us**

You have the right to seek access to or correction of your Personal Information. For access or correction or if you have questions related to this policy, please address your enquiries to:

**The Privacy Officer**  
**Krunchbox Operations Pty Ltd**  
**PO Box 5024**  
**Chullora NSW 2190**  
**Australia**  
**Telephone (within Australia) 1300 578 624**  
**or email us at [support@krunchbox.com](mailto:support@krunchbox.com)**

### **Policy Updates**

We may update this policy from time to time. Please check it regularly for updates.

*Last updated June 2018*