

Privacy Policy

Version 1.0

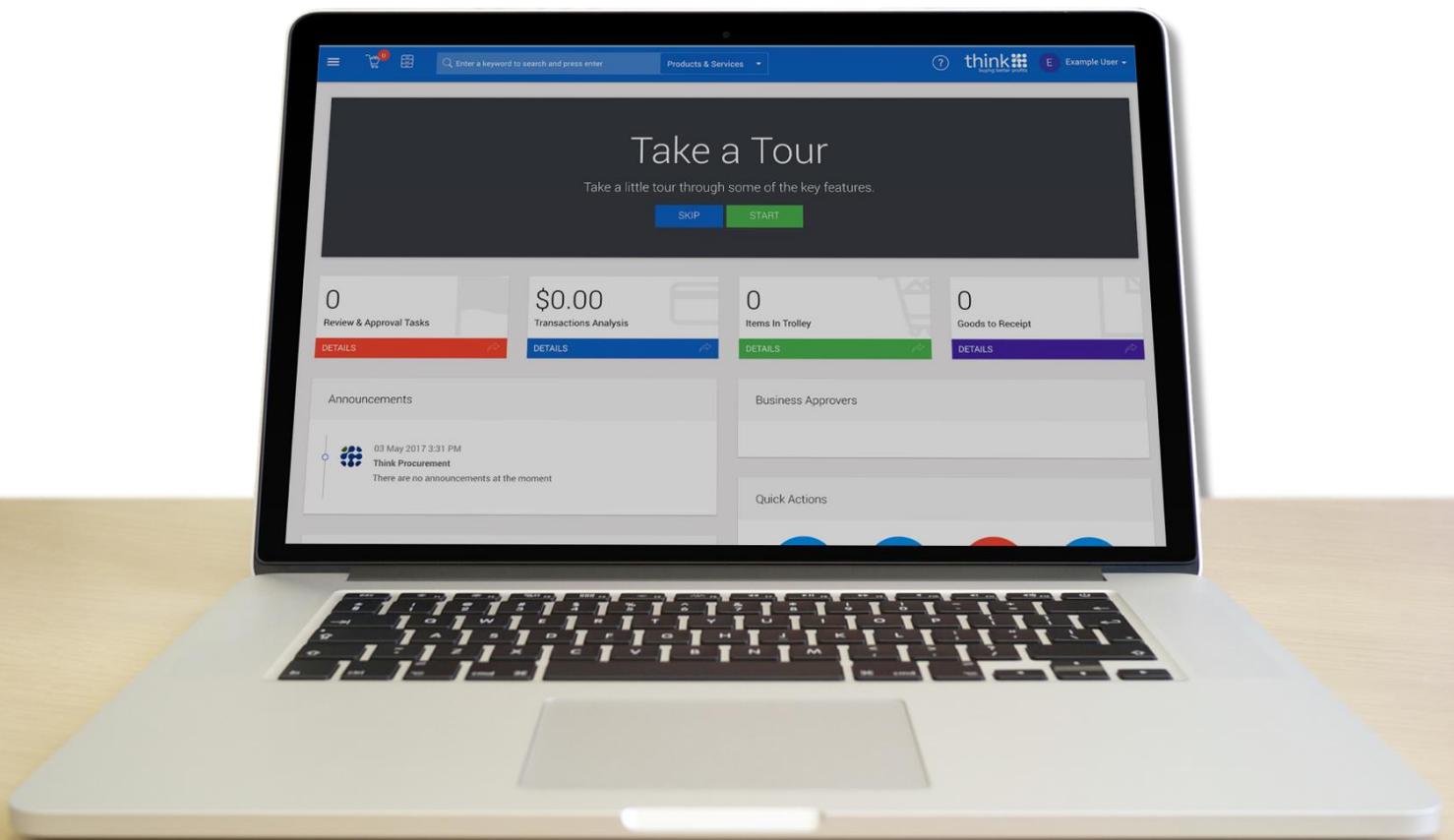


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Introduction

Summary of Document Purpose

The Privacy Policy outlines thinkHoldings Limited (ABN 19 143 106 147) policy on handling the personal information we collect about individuals, including customers, potential customers, suppliers and shareholders.

Version

Document Change History

| Version | Version Date | Change Description | Author(s) |
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| 1.0 | 20/02/2018 | Original | M. Tippett and S. Felsovary |
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Document Sign Off

| Type | Name | Title | Date |
|----------|--------------|--------------|------------|
| Approver | Stuart White | CEO/Chairman | 20/02/2018 |
| Approver | | | |

Think Privacy Policy

1. What is the Privacy Policy?

thinkHoldings Limited, ABN 19 143 106 147 at Level 1, 14 Spink St Brighton Vic, (we, us and our) is a Software as a Service business.

We are an Australian corporation and conduct our Australian operations in accordance with the Australian Privacy Act 1988 (Cth) (Privacy Act) and the Australian Privacy Principles (APPs) which form part of that Privacy Act.

This Privacy Policy relates to us and our subsidiaries.

This Privacy Policy sets out how we collect, use and disclose personal information entrusted to us by our customers or otherwise collected and used by us.

To the extent that relevant national privacy laws permit:

- a) this Privacy Policy is a privacy policy, privacy statement, privacy notice or like disclosure under those laws;
- b) this Privacy Policy is to be notice to affected individuals under those relevant laws, or the basis for consent of individuals to the activities described in this Privacy Policy, this Privacy Policy is a notice and disclosure informing consent by individuals to such activities.

We may modify or amend this Privacy Policy from time to time. We will display a notice on our website indicating when any such revisions have been made. This Privacy Policy was last updated on the date within the footer of this document.

Unless you notify us otherwise, when you click 'I ACCEPT' to this Privacy Policy, you consent (and we assume you consent) or in the case of where you are a user of our SaaS service, by your use of the system you are deemed to have consented to the collection of all information which is provided to us for use in accordance with this Privacy Policy.

2. What is Personal Information

Personal information is information or an opinion about an individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in material form or not.

Sensitive information is subset of personal information and has the meaning given to it in the Privacy Act. Sensitive information means information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health, genetic or biometric information. We do not knowingly collect, hold or use such information, except where required to provide services and consent is explicitly given. If we become aware that such information has been inadvertently collected, or is inadvertently held, by us without consent, we will destroy it.

3. What Personal Information do we collect?

We may collect personal information from you when you become a user of our system.

The information we request could include (but is not limited to) name, address, contact details and banking details where applicable.

When you access and use our website we will record and log for statistical purposes certain information about such access and use, including your IP address, the date and time of your visit, the parts of our website you access during your visit, your actions on our website, and the browser you are using.

Where we collect and use personal information about any identifiable individual from a publicly available source, we assess whether the collection and use is made in a manner both reasonably contemplated and permitted by the provider of that publicly available source. Where the collection and use is made in a manner both reasonably contemplated and permitted by the provider of that publicly available source, we rely upon that provider to:

- a) comply with relevant national privacy laws applying to the provider's activities; and
- b) to provide the necessary notices as required by relevant national privacy laws to that identifiable individual and to obtain the necessary consents from that individual to permit collection and disclosure by the provider of that publicly available source of that personal information, including disclosure in a manner reasonably contemplated and permitted by the provider of that publicly available source.

As well as collecting information directly from you, there may be occasions when we collect information about you from a third party. For example, we may collect information from a third party where they purchase products on your behalf. In such instances, we will determine whether we would have been entitled to collect such information from you under this section 3, and to the extent we would not have been entitled to do so, we will destroy or de-identify such information as soon as reasonably practical.

4. Anonymity

You do not have to provide us with any personal information if you choose not to, however if you do not provide us with your personal information, we may not be able to provide you with our goods or services.

5. Cookies

If you use our website, some of the personal information referred to in section 3 may be collected through the use of cookies. Most browsers are set by default to accept cookies. However, if you do not wish to receive any cookies you may set your browser to either prompt you whether you wish to accept cookies on a particular site, or by default reject cookies.

Please note that rejecting cookies may mean that some or all of the functions on our Website will not be available to you. In particular, cookies must be enabled to access and use any part of our Website for placing orders.

6. How is your personal information used?

The personal information that we collect is generally used to provide products or services to you, and, if you use our website, to track your usage, to evaluate performance of our website, and to keep track of your shopping cart and your account settings. Information collected by us may also be used for the following purposes:

- a) Assisting with your questions and complaints;
- b) Arranging for services to be provided by third parties;
- c) Enhancing our customer service and product options;
- d) Internal operations such as record keeping, data analytics, auditing or training;
- e) To keep you informed of product releases, service level performances or system outages;
- f) To keep you informed of the range product offerings or services offered by us; or
- g) as otherwise permitted under the Privacy Act.

You may opt out of receiving information by notifying us accordingly or using any unsubscribe facility we provide for that purpose.

7. Disclosure of personal information

We do not sell, rent or trade personal information to, or with, any other third parties.

We will not otherwise disclose your personal information to any third party unless:

- a) that third party is a group company of ours, in which case that group company will only use and disclose your personal information in accordance with this privacy policy as if a reference in this privacy policy to us included a reference to that group company;
- b) that third party is a contractor engaged to provide goods or services to us (including goods or services that assist us in providing our website). This may include disclosure to contractors outside of Australia. Our agreements with such contractors require that they keep your personal information confidential, and that they only use or disclose your personal information for the purposes of providing those goods or services to us;
- c) such disclosure is in connection with the sale of some or all of our business or assets; or

- d) you have consented for us to share the information for this purpose, or the disclosure is authorised by the Privacy Act including:
- i) to lessen or prevent a serious threat to life or health;
 - ii) to protect the personal safety of users of our website or the public;
 - iii) if authorised or required by law;
 - iv) if we have reason to suspect that unlawful activity has been, is being or may be engaged in;
 - v) to enforce the law or where necessary to investigate a suspected unlawful activity; or
 - vi) you would reasonably expect or we have told you that your personal information is usually used or disclosed to third parties in this way,

We may disclose your personal information to a third party, referred to in section 7a-d, that is located outside Australia, including in the Philippines, where our Level One Support Office is located.

8. Access and correction of personal information

We will, on request, provide you with access to the information we hold about you, including for the purpose of correcting or updating that information, unless there is an exception to such disclosure which applies under the Australian Privacy Principles (APPs).

If you require access to your personal information, please contact us at info@thinkprocurement.com. Before we provide you with access to your personal information we will require some proof of identity. For most requests, your information will be provided free of charge, however, we may charge a reasonable fee if your request requires a substantial effort on our part.

If we refuse to provide you with access to the information, we will provide you with reasons for the refusal and inform you of any exceptions relied upon under the APPs (unless it would be unreasonable to do so).

We take reasonable steps to ensure that your personal information is accurate, complete, and up-to-date whenever we collect or use it. If the personal information we hold about you is inaccurate, incomplete, irrelevant or out-of-date, please contact us and we will take reasonable steps to either correct this information, or if necessary, discuss alternative action with you.

9. How we hold and secure your personal information

The security of your personal information is important to us. We take reasonable steps to prevent the personal information we hold about you from misuse, interference or loss, and from unauthorised access, modification or disclosure. This includes the use of technologies and processes such as access control procedures, network firewalls, encryption and physical security to protect the privacy of your personal information. However, we exclude and limit our liability in respect of the same under our “Terms and Conditions” with you, which are accessible at www.thinkprocurement.com/legals.

10. Links to other websites

Sometimes our website contains links to other websites. When you access a website other than our website, we are not responsible for the privacy practices of that site. We recommend that you review the privacy policies of each website you visit.

11. How to contact us

If you have any queries or complaints with regard our collection, use or management of your personal information, please contact:

A: thinkholdings Limited, 19 143 106 147, Level 1, 14 Spink St, Brighton VIC 3183
E: info@thinkprocurement.com
T: +61 3 8306 3610

If you wish to make a complaint about an alleged breach of the Privacy Act, we ask that you send us your complaint in writing to the email address listed above. We endeavour to respond to complaints within a reasonable period (usually 30 days). If you are not satisfied with our response, you may make a complaint to the Office of the Australian Information Commissioner by phoning 1300 363 992 or by email at enquiries@oaic.gov.au.