

# Privacy Policy

## AreaTen Pty Ltd

AreaTen Pty Ltd respects your right to privacy and is committed to safeguarding the privacy of our customers and website visitors. We adhere to the Australian Privacy Principles contained in the Privacy Act 1988 (Cth). AreaTen privacy policy explains what personal data we collect from you and how we use it. This privacy policy is applicable if you visit AreaTen's corporate websites, social media or other web pages located on third-party websites, use any live chat or mobile application(s) provided by AreaTen. This privacy policy also applies if you use AreaTen's websites, hosted services, products, applications and/or content (collectively, the "Services") directly or through a AreaTen client (for example, on a AreaTen client's website, live chat or mobile application).

### What do we do?

AreaTen provides live chat services that enable digital communication between our business customers and consumers through chat on website, mobile and/or other social media channels.

### What information do we collect from you?

If you engage with a company that uses our Services, we may collect:

- Chat transcripts on behalf of the company,
- Information on behalf of and/or requested by the company, such as information related to your browsing, purchasing and online behaviour and activities, and
- Automatic information, such as IP address, operating system, geographic location information and type of device used.
- Personal information, like name, contact details, and location

If you visit our websites or use our apps, we may also collect:

- The information you provide to us, including:
  - o Personal information, such as your name and contact information,
  - o Surveys, transcripts, and recordings of your communications with us,
  - o The information you provide on our forums and blogs
- Automatic information, such as:
  - o Web browser and usage information, including IP address, browser types, page view logs, time spent on each page, page browsing information, operating system, geographic location information and type of device used.

### How AreaTen collect information from you?

We collect information when you engage with a company that uses our Services, which may be enabled on the company's website or in its mobile applications, SMS messaging capabilities, social media page/profile or other digital engagement solutions.

In addition, we may collect information through the following methods if you visit our websites or use our apps:

- o Your communications with AreaTen,
- o Your requests for information, news, and other content,
- o Your participation in one or more AreaTen forums or blogs,
- o A technical support request you submit,
- o Your participation in a AreaTen promotion, or
- o Recruitment and job applications.

We may also collect information from our direct interactions with you (such as through your attendance at a trade show or through sales inquiries), publicly available data or data provided by third-party sources, such as marketing opt-in lists.

## **Use of information collected by AreaTen**

We use the information we collect to provide and improve our services.

If you engage with a company that uses our Services, we collect the information on behalf of the company and use it as directed by the company. For example, we may use your information to determine whether to deploy a chat button to allow the company to engage with you or to deploy content, such as a banner offering a coupon, on your browser.

If you visit our websites or use our apps, we may also use your information for the following purposes:

- o To deliver information requested by you, for example in response to technical support requests,
- o To deliver marketing or other materials to you,
- o For promotions you may enter into, or
- o If you submit a resume or CV, to considering you for employment with AreaTen.

AreaTen may retain your information for a period of time consistent with the original purpose of collection. For example, if you engage with a company that uses our services, we may retain your information for the period of time agreed on with the company.

We may also retain your information during the period of time needed for AreaTen to pursue our legitimate business interests, conduct audits, comply with our legal obligations, resolve disputes, and enforce our agreements.

We may also use your personal information to protect the copyright, trademarks, legal rights, property or safety of AreaTen Pty Ltd, GreeChat.com, its customers or third parties.

AreaTen may contact you by a variety of measures including, but not limited to telephone, email, sms or mail.

## **Use of Cookies**

We may use cookies and other identification technologies for record-keeping purposes and to enhance your experience if you choose to visit our websites or our customer's websites

### **Cookies:**

Cookies are small text files stored on a visitor's web browser and applications. Cookies are often used to make web-browsing easier by performing functions such as saving passwords and maintaining lists of personal preferences regarding the use of the website.

Our websites, apps, and Services may use the following types of cookies:

- **Strictly Necessary Cookies** - these cookies are essential to enable you to browse our websites, apps, and Services and use the available features.
- **Performance Cookies** - these cookies collect information about how you use our websites, apps, and Services. For instance, these cookies track which pages you visit most. This data may be used to help optimize our websites, apps, and Services and make it easier for you to navigate within them. These cookies do not collect information that identifies you; all information is aggregated and anonymous.
- **Functionality Cookies** - these cookies allow our websites, apps, and Services to remember choices you make while browsing, such as geographic location and preferences such as text size and fonts. The information collected by these cookies will not personally identify you.

### **Other identification technologies that may be used by AreaTen websites, apps and Services:**

- **Pixel tags (also called beacons or pixels)** - these are small blocks of code installed on (or called by) a webpage or application, which can retrieve certain information about your device and browser, including device type, operating system, browser type and version, website visited, time of visit, referring website, IP address and other similar information.
- **Software Development Kits (also called SDKs)** - function like pixels and cookies, but operate in the mobile application context where pixels and cookies cannot always function. The application developer can install pieces of code (the SDK) into the application to collect certain information about user interaction with the application and information about the user device and network information.

### **Third-party technologies:**

AreaTen may use third-party service providers who are authorized to place cookies, pixel tags or similar technologies on our websites, apps, and Services with our permission. These technologies help us compile metrics and analytics (without collecting personally

identifiable information) to help improve our websites, apps, and Services. Third-party cookies and technologies are covered by the third party's privacy policy.

### **Your choice:**

Web browsers are usually set to accept cookies. However, if you prefer not to receive cookies, you typically have the option of setting your browser to refuse cookies. If your browser is set to refuse cookies, it is likely that some of the functionality offered by AreaTen will not be available or will not work as effectively for you.

For further information about cookies, including how to see what cookies have been set on your device and how to manage and delete them, you can visit [www.allaboutcookies.org](http://www.allaboutcookies.org) and [www.youronlinechoices.eu](http://www.youronlinechoices.eu).

### **Do Not Track**

Various browsers, including Internet Explorer, Firefox, and Safari, currently offer a "do not track" or "DNT" option that relies on a technology that sends a signal to websites a user visits about that user's browser DNT preferences. While AreaTen attempts to honour the DNT instructions received from a user's browser, AreaTen cannot guarantee that it will always respond to such signals because a common industry standard for DNT has not been adopted. AreaTen will continue to monitor developments in DNT browser technology.

### **Sharing of information collected**

AreaTen does not sell, trade or rent personal information provided by you in any transcript, survey or recording for direct marketing or any other purpose, except as provided in this privacy policy or with your permission. AreaTen does not disclose the contents of transcripts, surveys or recordings other than to service providers performing services on behalf of AreaTen, other than as provided in this privacy policy or with your permission.

### **The company you have engaged with through the Services**

If you engage with a company that uses our Services, we may also share your information with that company.

### **For legal reasons**

We may share your information if we reasonably believe that it: (i) is necessary to comply with a legal process (such as a court order, subpoena, or search warrant) or other legal requirements of any governmental authority; (ii) would potentially mitigate our liability in an actual or potential lawsuit; (iii) is necessary to enforce this privacy policy or any other agreement in place between you and AreaTen; (iv) is necessary to investigate and prevent unauthorized transactions or other illegal activities; and/or (v) is otherwise necessary or appropriate to protect our rights or property or the rights or property of any person or entity.

## **To deliver and improve the Services**

We may aggregate information so that it is not personally identifiable and use and share such aggregated information for training and quality assurance purposes and to deliver and improve our Services.

## **Service providers**

We use a limited number of third-party service providers to assist us in making our websites and Services available to visitors and users. For example, we may share data with third parties who provide services to us, such as credit card processing services, analytics, and data storage services. These third parties may access, process or store personal data in the course of providing their services.

## **Business partners**

From time to time, we may partner with other companies to allow AreaTen and its customers to offer integrations with our Services. If you engage with a company that uses one of these integrations, AreaTen may share your data with the third-party partner, receive data about you from the third-party partner, and/or combine third-party partner data about you with information about you that we collect. We do not control how a third-party partner may use your data. Use of your information by the third-party partner there is governed by its privacy policies. If you do not wish for your information to be shared in this way, you may opt not to use such integrations.

## **Affiliates**

We may share your information with subsidiaries, parent companies, or other affiliates of the AreaTen corporate group in order to deliver and improve the Services.

## **Other third parties**

The Cookies section above addresses the information AreaTen or third parties collect through cookies, pixel tags, SDKs, and similar third-party technologies and how you can control cookies through your web browsers. AreaTen may also disclose your personal information to any third party with your prior consent.

## **Access and changes to personal data**

If you elect to engage in any communication or engagement session with AreaTen or a customer that uses our Services, it is up to you to decide what, if any, information to provide during such session. Depending on your request, it may not be possible for us or our customer to address all of your questions without further information from you. Nevertheless, if you do not wish to provide certain information, then you should not do so.

## **Third-party integrations**

From time to time, we may partner with other companies to allow AreaTen and its customers to offer integrations with our Services. If you engage with a company that uses

one of these integrations, AreaTen may share your data with the third-party partner, receive data about you from the third-party partner, and/or combine third-party partner data about you with information about you that we collect. We do not control how a third-party partner may use your data. Use of your information by the third-party partner there is governed by its privacy policies. If you do not wish for your information to be shared in this way, you may opt not to use such integrations.

## **How can I review, correct, delete, or receive a copy of my information with AreaTen or withdraw my consent from AreaTen processing my personal data?**

If you have opted-in to receive AreaTen's marketing or advertising communications, you may, at any time, opt out of receiving further communications by clicking on the opt-out link at the bottom of a marketing or advertising email you receive. You may also contact us at [privacy@areaten.com](mailto:privacy@areaten.com) to opt out or to request changes to your personal information.

You may request to review, correct, delete, or receive a copy of any of the personal information you've provided to a company that uses the Services or withdraw your consent to AreaTen processing your personal data by either contacting the company directly or by contacting us at [privacy@areaten.com](mailto:privacy@areaten.com), and we will respond within a reasonable period of time and can help coordinate with and support the company as needed to respond to your request.

## **How does AreaTen keep my information secure?**

We use security measures designed to protect against the loss, misuse, and alteration of the information under our control. For certain AreaTen Services, chat/messaging transcripts are encrypted during transmission. In addition, transcripts that we store are maintained and archived on secure, hardened servers that are hosted on highly secure data centres. Access to this data is protected by multiple layers of controls, including firewalls, role-based access controls, and authentication mechanisms and monitoring. Data is backed up, and archives are stored off-site in a secure location.

If you are communicating with a company that uses our Services, you should review the privacy practices of that company to understand which security measures they use.

### **Additional mobile considerations**

In addition to the other terms in this policy, if you use our mobile application(s), access our mobile-optimised websites or have a conversation with a AreaTen customer that uses our Services in its mobile application(s), we may receive information about your location and your mobile device, including a unique identifier for your device. Most mobile phones allow you to control or disable location services in the device's settings menu. If you have questions about how to turn off location services, please contact your mobile phone manufacturer or mobile service carrier. You may also choose to allow our mobile application(s) to access features available on your devices, such as the device's camera and microphone, or to access the data stored on your devices, such as photos and videos, to share such media while using the application(s).

If you have opted-in to receive SMS messages from AreaTen, you may opt-out by following the opt-out instructions that we provide or by contacting us at [privacy@areaten.com](mailto:privacy@areaten.com)

If you have opted-in to receive SMS messages from one of our customers, you may opt-out by following the opt-out instructions provided by the company you are communicating with or by contacting the company. You may also contact us at [privacy@areaten.com](mailto:privacy@areaten.com), and we can help put you in touch with the company regarding your request.

## **AreaTen forums and blogs**

Information that you share on AreaTen forums or blogs becomes publicly available and therefore may be read, collected, copied and used by other users for any purposes at their discretion. Because this information is publicly available, AreaTen's privacy obligations outlined in this privacy policy do not apply to your use of any such forums or blogs.

## **International data transfers**

If you are located outside of Australia, please note that we may transfer your personal data outside your country of origin. By providing or making available your personal data, you consent to that transfer. Based on applicable laws in your country of residence, you may have certain rights with respect to your personal data that we retain.

We will take steps to ensure that your data is subject to appropriate safeguards required under this privacy policy, applicable data protection laws, and appropriate legally recognized data transfer adequacy mechanisms which may include entering into European Commission-approved standard contractual clauses related to transfers of personal information (available at [http://ec.europa.eu/justice/dataprotection/internationaltransfers/transfer/index\\_en.html](http://ec.europa.eu/justice/dataprotection/internationaltransfers/transfer/index_en.html)) For residents of the European Economic Area and Switzerland, AreaTen will execute standard contractual clauses among AreaTen affiliates for the purpose of its lawful transfers of personal data to Australia.

We use a limited number of third-party service providers to assist us in making our websites and Services available to visitors and users. For example, we may share data with third parties who provide services to us, such as credit card processing services, analytics, and data storage services. These third parties may access, process or store personal data in the course of providing their services. We currently maintain contracts with these third parties restricting their access, use, and disclosure of personal data. AreaTen is responsible if these third parties process personal data in violation of the privacy principles (unless AreaTen can prove that it's not responsible for the third party's action that violated the privacy principles).

EU individuals have the right to access personal data about them, and to limit use and disclosure of their personal data. AreaTen has committed to respect those rights. Because our personnel has limited ability to access personal data our customers submit through our Services, if you wish to request access to or to limit the use and/or disclosure of your personal data, please contact us with the name of the AreaTen customer through which you used our Services. We will refer your request to that customer and will support them as needed in responding to your request.

Information that we collect may from time to time be stored, processed in or transferred between parties located in countries outside of Australia. These may include, but are not limited to Australia, USA, India, Philippines.

Any enquiries or complaints regarding our data privacy practices or compliance may be directed to [privacy@areaten.com](mailto:privacy@areaten.com). We will respond within 30 days and provide appropriate recourse at no cost to you.

## **Children**

The Services are not directed to individuals under 18. If you are under the age of 18, you may not use the Services or provide any personal information to us. AreaTen does not knowingly collect personal information from individuals under the age of 18. If you are a parent of an individual under 18 and believe your child has provided personal information to AreaTen, please contact us at [privacy@areaten.com](mailto:privacy@areaten.com)

## **Miscellaneous**

We recommend that you review this privacy policy periodically, as we may update it from time to time. Your use of our websites, apps, and Services, as applicable, constitutes your consent to the new privacy policy to the fullest extent permitted by law.

We recommend that you review this privacy policy periodically, as we may update it from time to time. We encourage your use of our websites, apps, and Services, as applicable, constitutes your consent to the new privacy policy to the fullest extent permitted by law.

We are not responsible for and do not control the privacy practices of any of our customers or any other third party. We encourage you to review the privacy practices of each third party. We welcome your feedback on our privacy policy. Please send any comments or questions to [privacy@greechat.com](mailto:privacy@greechat.com)

15 May 2018