



PRIVACY POLICY

Last updated: 6 May 2020

At Vero Engagement and Voting Solutions Pty Ltd, we are committed to protecting your privacy as a customer and an online visitor to our website. The information we collect, or use is only for the purpose of what we have been hired to do and only to maximize the services that we provide. We respect the privacy and confidentiality of the information provided by you and adhere to the Australian Privacy Principles. Please read our privacy policy below carefully.

In this policy, we cover what data we collect and why, how your data is handled, and your rights to your data. We promise we will never sell your data.

This policy applies to all services provided by Vero Engagement and Voting Solutions Pty Ltd.

What we collect and why

Our guiding principle is to collect only what we need. Here is what that means in practice.

Voting Services

Vero conducts several voting, election, and survey solutions. Employee, Member and Shareholder information may only be stored for the purpose of the task that Vero has been hired to do such as communicate login information to access Vero's services in order for the "voter" to conduct their required

Identity & access

When you have your initial conversation with a Vero staff member, you will be asked for identifying information such as your name, email address, and company name, along with additional essential

information. This is used to personalise Vero's advice, products, and services towards your needs. We will not sell your personal information to third parties, nor will we use your name or company in marketing statements without your permission.

Billing information

When you pay for Vero's products and services, we ask for your credit card details and billing address in order to charge you services and send you invoices. Your credit card details are passed directly to our payment processor. We store a record of the payment transaction, including the last 4 digits of the credit card number and billing address for account history, invoicing, and billing support. We store your billing address to calculate any sales tax required, to detect fraudulent credit card transactions, and to print on your invoices.

Website interactions

When you browse our website, your browser automatically shares certain information such as which operating system and browser version you are using. We track that information, along with the pages you are visiting, page load timing, and which website referred you for statistical purposes like conversion rates and to test new designs. We sometimes track your interactions with specific site elements to help inform design decisions. This web analytics data is tied to your IP address.

Cookies and Do Not Track

We do use persistent first-party cookies to store certain preferences and support analytics. A cookie is a piece of text stored by your browser to help it remember your login information, site preferences, and more. You can adjust cookie retention settings in your own browser.

At this time, our website does not respond to Do Not Track beacons sent by browser plugins.

Voluntary correspondence

When you email Vero with a question or to ask for help, we keep that correspondence, including the email address, so that we have a history of past correspondences to reference if you reach out in the future.

We also store any information you volunteer, like surveys. Sometimes when we do customer interviews, we may ask for your permission to record the conversation for future reference or use. We only do so if you give your consent.

Information we do not collect

We do not collect any characteristics of protected classifications including age, race, religion or sexual orientation. You may provide this data voluntarily, such as if you include a pronoun preference in your email signature when writing into our Support team.

When we access or share your information

Our default practice is to not access your information. The only times we will ever access or share your information are:

To provide products or services you have requested. We do use some third-party services to run our applications and only to the extent necessary, process some or all your personal information via these third parties. Having subprocesses means we are using technology to access your data. No Vero employee looks at your data for these purposes.

When required under applicable law. If the appropriate law enforcement authorities have the necessary warrant, criminal subpoena, or court order requiring we share data, we must comply. Otherwise, we reject requests from local and federal law enforcement when they seek data. And unless we are legally prevented from it, we will always inform you when such requests are made.

Your Rights with Respect to Your Information

At Vero, we apply the same data rights to all customers, regardless of their location. You may request that we erase any personal data we hold about you. This does not include any data we are obliged to keep for administrative, legal, or security purposes.

Vero recognises that you have the following rights:

Right to Know – You have the right to know what personal information is collected, used, and shared. We outline both the categories and specific bits of data we collect, as well as how they are used, in this privacy policy.

Right of Access – This includes your right to access the personal information we gather about you, and your right to obtain information about the sharing, storage, security, and processing of that information.

Right to Correction – You have the right to request correction of your personal information.

Right to Erasure / “To Be Forgotten” – This is your right to request, subject to certain limitations under applicable law, that your personal information be erased from our possession and, by extension, all our service providers. Fulfilment of some data deletion requests may prevent you from

using Vero services because our applications may then no longer work. In such cases, a data deletion request may result in closing your account.

Right to Complain – You have the right to make a complaint regarding our handling of your personal information with the Office of the Australian Information Commissioner.

Right to Restrict Processing – This is your right to request restriction of how and why your personal information is used or processed, including opting out of sale of personal information (as mentioned above, Vero does not do this).

Right to Object – You have the right, in certain situations, to object to how or why your personal information is processed.

Right to Portability – You have the right to receive the personal information we have about you and the right to transmit it to another party.

Right to not be subject to Automated Decision-Making – You have the right to object and prevent any decision that could have a legal, or similarly significant, effect on you from being made solely based on automated processes. This right is limited, however, if the decision is necessary for performance of any contract between you and us, is allowed by applicable law, or is based on your explicit consent.

Right to Non-Discrimination – We do not and will not charge you a different amount to use our products and services, offer you different discounts, or give you a lower level of customer service because you have exercised your data privacy rights.

How we secure your data

All data is encrypted via SSL/TLS when transmitted from our servers to your browser. The database backups are also encrypted. Most data are not encrypted while they live in our database, but we go to great lengths to secure your data at rest.

Location of Site and Data

Our products and other web properties are operated in Australia. If you are located outside of Australia, please be aware that any information you provide to us will be transferred to Australia. By using our Site, participating in any of our services and/or providing us with your information, you consent to this transfer.

Change in Privacy Policy

As we plan to ensure our privacy policy remains current, this policy is subject to change. We may modify this policy at any time, in our sole discretion and all modifications will be effective immediately upon our posting of the modifications on this website. Please return periodically to review our privacy policy.

If Vero is acquired by or merged with another company, we will notify you well before any information about you is transferred and becomes subject to a different privacy policy.

Questions

If you have any questions, comments, or concerns about this privacy policy, your data, or your rights with respect to your information, please get in touch by emailing us at support@verovoting.com.au and we'll be happy to answer them.