



**1<sup>st</sup> of January 2021**

**SOLUCIA PTY LTD T/A INSTITUTE OF GAMES**

**ABN: 52 604 393 660**

**PRIVACY POLICY**

## PRIVACY POLICY

Solucia Pty Ltd t/a Institute of Games, ABN: 52 604 393 660 is committed to protecting and respecting your privacy.

### 1. Scope

This policy, together with our Terms of Use and any other documents referred to in it, sets out how Solucia Pty Ltd t/a Institute of Games, ABN: 52 604 393 660 (Institute of Games) handles personal information, including the basis on which any information (including any information of a personal nature) we collect from you, or that you provide to us, will be processed, stored, and disclosed by us, in compliance with the Australian Privacy Principles (**APPs**) and the *Privacy Act 1988* (Cth) (the **Act**), and other regulations, including under European and Californian laws.

Please read the following carefully to understand our views and practices regarding your information and how we will treat it.

### 2. Information Collection

2.1. In order to provide a better service to you, we may collect and process the following information about you:

- a) Information or an opinion about an identified individual, or an individual who is reasonably identifiable:
  - i. whether the information or opinion is true or not; and
  - ii. whether the information or opinion is recorded in a material form or not  
**(Personal Information)**

2.2. For clarity, Personal Information about you collected by us may include:

- a) certain telecommunications Data (sometimes referred to as 'metadata') is taken to be Personal Information for the purposes of the Act under the *Telecommunications (Interceptions and Access) Act 1979* (Cth);
- b) information that you provide by filling in forms on our site [instituteofgames.com](http://instituteofgames.com) and [streetsofmytown.com](http://streetsofmytown.com) (our sites). This includes information provided at the time of registering to use our site, subscribing to our information or any booking service, signing up for newsletters, or requesting further services;
- c) we may also ask you for Personal Information at other times, for example in connection with a promotion or when you report a problem with our site or service.

- 2.3. Other information we collect about you may include:
- a) if you contact us, we may keep a record of that correspondence;
  - b) we may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them;
  - c) details of transactions you carry out through our site and of the fulfilment of your orders;
  - d) details of your visits to our site and the resources that you access;
  - e) when you apply for a job with us;
  - f) data collected in Streets of My Town app ; or
  - g) when you interact and engage with social networking services such as Facebook, LinkedIn and Twitter.
- 2.2 We only retain Personal Information and other information (**Data**) for so long as it is necessary. Data may be archived as long as the purpose for which the Data was used still exists.

### 3. How We Use Your Information

- 3.1 The purposes for which Data may be used by us include:
- a) ensuring that content from our site is presented in the most effective manner for you and for your computer/mobile device/tablet;
  - b) providing you with alerts, newsletter, education materials or information that you requested or signed up to;
  - c) carrying out our obligations arising from any contracts entered into between you and us;
  - d) allowing you to participate in interactive features of our service, when you choose to do so;
  - e) designing and conducting surveys/questionnaires for client profiling/segmentation, statistical analysis, improving and furthering the provision our products and services;
  - f) complying with laws and regulations applicable to us or any of our affiliates in or outside Australia;
  - g) legal proceedings, including collecting overdue amounts and seeking professional advices;
  - h) researching, designing and launching services or products including seminars/events/forums;

- i) for purposes of administering our business activities, providing customer service and making available other items and services to our customers and prospective customers;
- j) Provide reports to clients that commissioned a Streets of My Town version; or
- k) purposes directly related or incidental to the above.

3.2 We intend to use your Data in direct marketing and we require your consent (which includes an indication of no objection) for that purpose. By using our site, unless you tell us otherwise, you agree that:

- a) your name, contact details (including address, contact number, email address), products and services information, transaction pattern and behaviour, background and demographic Data held by us from time to time may be used by us in direct marketing;
- b) the following classes of services, products and subjects may be marketed to you:
  - i. services and products related to our site and/or our affiliates (including marketing affiliates programs we are a part of);
  - ii. reward, loyalty or privileges programmes, promotional offers and related services; and
  - iii. invitations to events such as seminars/webinars/tele-seminars, conferences, live programs or events.
- c) we may conduct direct marketing via email, direct mail, telephone and other means of communication or send e-newsletters to you. You may choose not to receive promotional materials, by simply telling us (see below for contact details), and we will cease to do so, without charge.

#### **4. Disclosure of Your Information**

4.1 We will keep the personal Data we hold confidential but may provide information to:

- a) personnel, agents, advisers, auditors, contractors, financial institutions, and service providers in connection with our operations or services;
- b) our offices, affiliates, business partners and counterparts (if any);
- c) persons under a duty of confidentiality to us;
- d) persons to whom we are required to make disclosure under applicable laws and regulations in or outside Australia; or
- e) actual or proposed transferees or participants of our services in or outside Australia.

## 5. Cookies

- 5.1 Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.
- 5.2 A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive.
- 5.3 Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.
- 5.4 We may use the following third party web analytic services on the website. The service providers that administer these services use technologies such as cookies, web server logs and web beacons to help us analyse how visitors use the website. The information collected through these means (including IP address) is disclosed to these service providers, who use the information to evaluate use of the website. These analytic services may use the Data collected to contextualise and personalise the marketing materials of their own advertising network.
- 5.5 Google Analytics: Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google's ability to use and share information collected by Google Analytics is in accordance with their policies:  
<http://www.google.com/policies/privacy/partners/>
- 5.6 You can prevent Google's collection and processing of Data by using the Google Ads Settings page or downloading and installing their browser plug-in (<https://tools.google.com/dlpage/gaoptout>).
- 5.7 You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

## 6. Storage & Security

- 6.1 All Data you provide to us electronically is stored on secure servers.
- 6.2 Any payment transactions will be encrypted using SSL technology.
- 6.3 Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

- 6.4 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Information, we cannot guarantee the security of your Data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.
- 6.5 We may hold your Data on third-party servers in Australia and any other territories as we see fit from time to time. We may also transfer your Data to our overseas offices or to any people listed at Clauses 3 and 4 above, who may be located in or outside of Australia, including New Zealand, the United States of America, and Europe.

## **7. Changes to Our Privacy Policy**

Any changes we may make to our Privacy Policy in the future will be posted on this page.

## **8. Your consent and rights**

- 8.1 By using our service, making an application or visiting our website, you consent to the collection and use of your information and other activities as outlined in this policy.
- 8.2 Under the Act, individuals have the right:
- a) to check whether we hold personal Data about you and to access such Data;
  - b) to require us to correct as soon as reasonably practicable any Data relating to you that is inaccurate;
  - c) to ascertain our policies and practices in relation to personal Data and the kind of Personal Information held by us; and
  - d) to withdraw your consent to the use of your personal Data for marketing purposes and we shall not use your personal Data for marketing purposes after you communicate your withdrawal of consent to us.
- 8.3 You may exercise your opt-out right by notifying us if you wish to withdraw your consent to the use of your personal Data for direct marketing purposes.
- 8.4 In accordance with the Act, we have the right to and may charge a reasonable fee for processing any Data access request.

## **9. Accessing and correcting your personal information**

If you ask, in most cases we must give you access to the Personal Information that we hold about you, and take reasonable steps to correct it if we consider it is incorrect. We will try to make the process as simple as possible.

## **10. General Data Protection Regulation (GDPR)**

If you are located in the European Union or European Economic Area (**EEA**), you may also have certain rights under the General Data Protection Regulation (**GDPR**). The Personal Information (Personal Data) you provide on this web page to use or to register for our services is being collected with your consent, for the exclusive purpose of permitting us to facilitate your usage of our services and to contact you in connection with our services. The Data may be stored or processed outside of the EU, including in the Australia, on our servers or servers available to us.

## **11. The California Consumer Privacy Act of 2018 (CCPA)**

11.1 If you are a resident of the state of California, USA, and using our service, you may also have certain rights under the California Consumer Privacy Act of 2018 (**CCPA**).

11.2 California residents are entitled to the following privacy rights listed below:

- a) the right to know: (i) the specific pieces of Personal Information we have about you; (ii) the categories of Personal Information we have collected about you in the last 12 months; (iii) the categories of sources from which that Personal Information was collected; (iv) the categories of your Personal Information that we sold or disclosed in the last 12 months; (v) the categories of third parties to whom your Personal Information was sold or disclosed in the last 12 months; and (vi) the purpose for collecting and selling your Personal Information;
- b) the right to deletion;
- c) the right to opt out of the sale of your Personal Information; and
- d) the right to equal service.

11.3 California residents are entitled to request and obtain from Institute of Games once per calendar year information about any of your Personal Information shared with third parties for their own direct marketing purposes, including the categories of information and the names and addresses of those businesses with which we have shared such information. To request this information and for any other questions about our privacy practices and compliance with California law, please contact us at the address below.

## **12. How to make a complaint**

You can complain to us in writing about how we have handled your Personal Information. We will respond to the complaint within 30 days.

## **13. How to contact us**

You can contact us at:



steven@instituteofgames.com

0400882378

8b Armagh Road, Frankston South

Last updated: 18/08/2021