

# Schedule B

# OutWatch

# Privacy Policy

## Scope

*Last updated: 1 August 2023*

We take data privacy very seriously and recognize the importance of protecting and respecting your personal data. This Privacy Notice describes the personal information we collect through our website at [www.outwatch.io](http://www.outwatch.io) (the "**Website**") and via your use of our platform software (the "**Software**") and the OutWatch apps (the "**Apps**"), and together with the Website and Software, the "**Services**"), how we use that information, to whom we pass the information, your rights and key contact information.

OutWatch Pty Limited ("**OutWatch**", "**we**", "**our**"), an Australian company, is the data controller under applicable law, and is responsible for the collection, use, disclosure, retention and protection of your personal information in accordance with our global privacy standards as well as any applicable national privacy laws. We may process and retain your personal information on servers, including in the UK, Australia, New Zealand and the US.

Please read this Privacy Notice carefully so that you understand your rights in relation to your personal information, and how we will use your personal information. If you do not agree with this Privacy Notice or any part of it, you should not access or use any part of the Services. If you change your mind in the future, you must stop using the Services and you may exercise your rights in relation to your personal information as set out in this Privacy Notice.

# Personal information

"Personal information" is information that can be associated with a specific person and could be used to identify that specific person whether from that data or from that data and other information that OutWatch has or is likely to have access to. Personal information does not include information that has been made anonymous or aggregated so that it can no longer be used to identify a specific person, whether in combination with other information or otherwise.

If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Privacy Notice.

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## 1. What does OutWatch do?

Developed and headquartered in Australia, OutWatch is a revolutionary SaaS based platform that makes monitoring, managing and validating digital-out-of-home ("DOOH") screens simple and seamless for all parties. The OutWatch software platform is designed to specifically meet the needs of DOOH media owners and DOOH servicing and maintenance companies.

For more information about OutWatch, please see our Website at [www.outwatch.io](http://www.outwatch.io) .

## 2. What personal information does OutWatch collect?

The personal information that we may collect about you broadly falls into the following categories:

### *Information that you provide*

When you use the Services you will be asked to provide personal information including:

- Registration Information: when you register an account with us, we collect your contact details (such as your name, email address and phone number) and password;
- Contact Information: you may be asked to provide your contact details to subscribe to marketing communications from us; and
- Communication Information: if you submit enquiries to us, including via our chatbot, you provide us with personal information such as your contact details, and the contents and nature of your correspondence.

If you provide personal information of other individuals, please make sure you have permission from them before sharing such personal information.

As part of our general terms and conditions, we allow our customers to give access to their OutWatch subscription to their employees, agents, contractors and others (designated users), by giving them a password with suitable user access permissions, or otherwise inviting them to use the Services. When you as a designated user use our Apps, our customers are data controllers in relation to the processing of your personal information under applicable law, including your registration information, and other information you upload. Please review their privacy policies to learn how they use your information. We will use such information in accordance with this Privacy Notice, to create aggregated and anonymized information, to improve and develop our Services, to create new services and to comply with law.

## ***Information that we collect automatically***

When you use our Services, we will collect certain information automatically from your device. In some countries, including countries in the European Economic Area and the UK, this information may be considered personal information under applicable data protection laws.

Specifically, the information we collect automatically includes:

- Device Information: information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information; and
- Usage Information: We also collect information about how you have interacted with our Services, including the pages accessed, information downloaded, and links clicked, along with time stamps.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading “Cookies and similar tracking technology” below.

## ***Third Parties***

We collect personal information (such as contact details) from other legitimate sources, such as third-party data aggregators, OutWatch marketing partners, public sources or social media platforms.

If you pay for our Services, you will provide information to third party payment processors, such as Stripe. We receive personal information from you and payment processors in relation to such transactions, including business name, and information for payment verification.

We also create, collect, use and share aggregated data such as statistical or demographic data for our purposes. Aggregated data may be derived from your personal information but is not personal information as this data will not directly or indirectly reveal your identity. For example, we may aggregate data about your use of our Services to calculate the percentage of users accessing a specific feature. However, if we combine or connect aggregated data with your personal information so that it can directly or indirectly identify you, we will treat the combined data as personal information which will be used in accordance with this Privacy Notice.

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## 3. How does OutWatch use my personal information?

In general, we will use the personal information we collect from you or your designated users only for the purposes described in this Privacy Notice or for purposes that we explain to you at the time we collect your personal information. However, we may also use your personal information for other purposes that are compatible with the purposes we have disclosed to you if and where this is permitted by applicable data protection laws.

### ***To provide you with the Services***

We use your personal information, such as your registration, device and usage information, to operate, maintain and provide you with the Services. In particular we will use your personal information to perform our contractual obligation towards you to allow you to upload information to the Services, and to contact you with information about your account. We use your personal information, including transaction information, to allow us to perform our contractual obligation towards you to allow you to pay for the Services, and for invoicing and record keeping purposes. Our lawful basis for processing your personal information for this purpose is contractual necessity. If you decline to provide us with personal information necessary to deliver the Services, we may not be able to contract with you.

### ***To improve the Services***

We use your personal information, including device and usage information, to improve the Services including, to better understand the visitors who come to our Website, and how our Services are used. It is in our legitimate interests to use your information to improve the quality and relevance of our Services. Our lawful basis for processing your personal information is that processing is necessary for the purposes of the legitimate interests pursued by the OutWatch, and these legitimate interests are not overridden by the interests or rights of the individuals concerned.

## ***To provide you with support and to respond to your requests and complaints***

If you reach out to us for support, we will perform our contractual obligation towards you by using your contact details, as well as any information you choose to provide to respond and resolve your queries and facilitate support. Our lawful basis for processing your personal information for this purpose is contractual necessity.

## **Marketing**

Where consent is needed, we will only send you marketing communications by email or phone, using your contact details, usage information and information from third parties, where you have provided such consent. Otherwise, we send you communications where we have a legitimate interest to do so.

You can control your email marketing preferences by contacting OutWatch and advising of your preferences.

Our lawful bases for processing your personal information for this purpose is that the individual has given his or her consent (where required) or legitimate interest, as it is in our legitimate business interests to undertake marketing to promote our business, and this legitimate interest is not overridden by the interests or rights of the individuals concerned.

## **To comply with legal obligations and to prevent illegal activities**

It is in our legitimate interests to enforce our terms and policies, to ensure the integrity of our Software and Website and to defend ourselves against legal claims or disputes. Where we do so, we will use the personal information relevant to such a case. Some processing may also be necessary to comply with a legal obligation placed on OutWatch (for example, to keep records of transactions for tax purposes).

## 4. Who does OutWatch share my personal information with?

We disclose your personal information to the following categories of recipients:

- to our **group companies**, who process personal information in order to provide you with the Services;
- to our **third party services providers, contractors and partners** who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Website or the Software), or who otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when we collect your personal information.
- with other **third parties who we integrate into our Services**, including:
  - payment processors and gateways, who we use to process payments from you via the Services or otherwise to facilitate payments on the platform, including:

\* Airwallex: [https://www.airwallex.com/au/terms/privacy-policy#privacy-policy\\_\\_scope-of-policy](https://www.airwallex.com/au/terms/privacy-policy#privacy-policy__scope-of-policy)

Those payment processors will collect personal information when you pay for our Services, and use it for their own purposes, including name and contact details and payment information. Please review their privacy policies carefully.

- providers of accounting software, including Xero, who will collect and use your personal information in line with its privacy policy at <https://central.xero.com/s/article/Privacy-at-Xero>; and
- to any **competent law enforcement body, regulatory, government agency, court or other third party** where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- to a **potential buyer, or other third party** (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, or in the event of another change in corporate ownership (e.g. bankruptcy or reorganization); or

- to any **other person with your consent** to the disclosure.

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## 5. Cookies and similar tracking technology

We use cookies and similar tracking technology on our Website (collectively, “**Cookies**”) to collect and use personal information about you. For further information about the types of Cookies we use, why, and how you can control Cookies, please contact OutWatch.

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## 6. How does OutWatch keep my personal information secure?

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

We will do our best to protect your information, however we cannot guarantee the security of your information transmitted to our site or sent to us by email or other non-secure electronic methods. Any such transmission is at your own risk. Once we have received your information, we will use protective procedures and security



features to try to prevent unauthorised access. We recommend contacting us before attempting to transmit any materials via an unsecured route.

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## 7. International data transfers

OutWatch is committed to adequately protecting your information regardless of where the data resides and to providing appropriate protection for your information where such data is transferred outside of the EEA or UK.

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective).

Specifically, our Website and Software servers are located in the UK, New Zealand, Australia and the US, we are based in Australia and our group companies and third-party service providers and partners operate around the world. This means that when we collect your personal information we may process it in any of these countries.

However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Notice.

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## 8. Data retention

We retain personal information for as long as necessary to fulfil the purposes set out in this Privacy Notice, or for as long as we are required to do so by law or in order to

comply with a regulatory obligation. When deleting personal Information, we will take measures to render such personal information irrecoverable or irreproducible, and the electronic files which contain personal information will be permanently deleted.

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## 9. Your data protection rights

Depending on your particular circumstances and the jurisdiction in which you are based, you may have the following data protection rights in relation to your personal information:

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting us using the contact details provided under the “How to contact us” heading below.
- Where you have a statutory right to request access or request the modification or erasure of your personal information, we can still withhold that access or decline to modify or erase your personal information in some cases in accordance with applicable national laws, but will give you reasons if we do so.
- In addition, if you are a resident of the European Union, you can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the “How to contact us” heading below.
- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the “How to contact us” heading below.
- Similarly, if we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to

your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

- You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority.

- New Zealand: <https://www.privacy.org.nz/>

- Australia: <https://www.oaic.gov.au/>

- United Kingdom: <https://ico.org.uk/>

- European Union: <https://www.eugdpr.org/>

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

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## 10. Children's Privacy

Our Services are not directed to children, and we do not knowingly collect personal information from children under the age of 18. If you learn that a child has provided us with personal information in violation of this Privacy Notice, please contact us as indicated below.

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## 11. Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the top of this Privacy Notice.

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## 12. How to contact us

If you have any questions or concerns about our use of your personal information, or wish to contact our Privacy Officer please contact us using the following details:

Support@outwatch.io

The data controller of your personal information is OutWatch Pty Limited an Australian company, with its registered office at 11 Exchange Parade, Narellan, NSW 2570 Australia.

Our representative in the UK is Candelic UK Limited.