



Privacy Policy

October 2024



1. Introduction

Airlock Digital Pty Ltd ACN 169 643 770 (“Airlock Digital”, “we” or “us”) is committed to managing personal data it collects in an open and transparent way. Airlock Digital adheres to the Australian Privacy Principles (APPs) set out in Privacy Act 1988 (Cth) (the Act) and all other applicable laws and regulations including the General Data Protection Regulation 2016/679 as set forth by the European Union regarding the collection, use, and retention of personal data from European Union member countries and Switzerland (“GDPR”) and US laws relating to privacy (see section 17 for more details).

This Privacy Policy describes the way we collect, use, maintain, and disclose information from:

- the use of our website (e.g. www.airlockdigital.com (the “Websites”), event participants, prospective customers, or other situations in which Airlock Digital collects information from you; and
- the use of our products and the performance of our services (collectively our “Services”).
- the information that Airlock Digital collects and why we collect it; and
- your rights regarding your information.

In this policy, the terms:

- “user,” “customer,” “you,” and “your” are meant to refer to the individuals about whom we may collect personal data, and at times may be used within this policy interchangeably; and
- ‘Personal data’ is data that relates to you and that identifies you, or from which you can reasonably be identified. This may include your name and contact information, as well as some digital identifiers relating to you. If you are located in Australia, in this Privacy Policy ‘personal data’ means ‘personal information’ as defined under the Act.

Airlock Digital may amend this Privacy Policy from time to time. Upon such amendment, we will post a notice on the Website to notify you of any substantive changes to the way we collect and use information and we will use reasonable endeavors to notify our existing customers by email. We will indicate at the top of the Privacy Policy when it was last updated. We recommend that you visit our website regularly to keep up to date with any changes.

Additional detail about the information we collect as part of the Services and how it is used is described in our Airlock Digital PII & Data Collection Document (the “PII Policy”). The PII Policy is incorporated herein and made a part of this Privacy Policy. To the extent there is a conflict between the PII Policy and this Privacy Policy, the PII Policy will control.

2. The Information Airlock Digital Collects, Uses and Why

The personal data Airlock Digital collects from you may include your full name, contact details such as your e-mail address and telephone number, information about your employer or an organisation you represent, your professional details such as your job title/position, and any other personal data you provide to us, or authorise us to collect, as part of your interaction with us.

To the extent that Airlock Digital collects sensitive information (as defined under the Act), it does so only where it is necessary for the purpose for which it is being collected and where collection is required or authorised by law.

Airlock Digital collects and uses personal data for a variety of different purposes relating to its functions and activities including:

- providing customer support, assistance and assessing customer needs;
- responding to and engaging with prospective and existing customers, for example to provide information about our products and services;
- file and machine metadata in connection with the use of Airlock Digital’s software products and services;
- storing data about users of Airlock Digital’s website to create a digital profile to assist those users and improve Airlock Digital’s services;

- Airlock Digital's business administration (such as billing or entering into contracts with you);
- researching, developing and expanding our facilities, products and services;
- direct marketing purposes, such as informing you of our activities, events, facilities and services, and responding to requests to subscribe to our mailing lists;
- legislative, regulatory and legal compliance, including fulfilling our obligations under contracts with you or third parties, or complying with legal or administrative requests; and
- investigating suspected fraud, harassment or other violations of any law, rule or regulation, or the terms or policies for our services or our sponsors.

We may also collect and use your personal data for other purposes which may be explained at the time of collection. In some cases, if you do not provide us with personal data we may not be able to provide the services you have requested.

Non-personal or aggregated data may be used by us for any purposes permitted by law and may be shared with any number of parties, provided that such information shall not specifically identify you.

3. How Airlock Digital Collects and Holds Personal Data

Airlock Digital may collect personal data in a variety of ways, including (but not limited to) the following:

- when you send us an email or 'contact us' message or make a written or telephone enquiry with us;
- information provided through support tickets or registered portal customers;
- when you use our software and systems (including web-based systems);
- from third parties that provide us with marketing, market research, and web analytics services;
- from third parties and contractors who assist us to operate our business, including running promotions in connection with the supply of our products and services; and
- if you are participating in an event we are managing or delivering, we may take images or audio-visual recordings which identify you.

4. Cookies & Web Analytics

When you access the Website, log files ("cookies") are created by the web server that contain certain information including your Internet Protocol (IP) address, the previous site visited, the time and date of access and pages visited and downloaded. Cookies allow a website, such as the Airlock Digital website, to temporarily store information on an individual's machine for later use. Airlock Digital's website uses cookies (and similar items such as clear gifs, web beacons, tags, etc.) to identify unique visitors to the site, and to help with ensuring the functionality of the site. This enables Airlock Digital to provide a better website visitor experience by loading the site so that it reflects your personal preferences as previously indicated last time you browsed.

Airlock Digital uses web analytics to obtain statistics about how its website is accessed. Web analytics relies upon cookies to gather information for the purpose of providing statistical reports to Airlock Digital, for example by counting the number of visitors and tracking how visitors use the site. The information generated by the cookie about an individual's use of the Airlock Digital website is transmitted to and stored by web analytic service providers on servers located within and outside Australia.

This type of analysis helps us make our website more effective to use, for example by improving how easy it is for users to find what they are looking for on our site, or fixing any issues users have with our site.

You generally have the option of accepting or rejecting cookies by adjusting the settings in your web browser. However, rejecting cookies may impact upon the functionality of the Airlock Digital website.

5. Automatically Collected Information

When you access the Website or open one of our HTML emails, we may automatically record certain information from your system by using cookies and other types of tracking technologies.

When you access our website or communicate with us, we may automatically collect non-personal data from you, such as web pages viewed, browser type, operating system, referring service, search information, device type, page views, usage and browsing habits on the Service and similar information.

We may also aggregate demographic information collected from our users (such as the number of users in a particular geographical location) in a manner which does not identify any one individual. We may also aggregate information collected offline, obtain non-personal data from third party sources and develop aggregate information by anonymizing previously collected personal data.

It is possible at times when collecting non-personal data through automatic means that we may unintentionally collect or receive personal data that is mixed in with the non-personal data. While we will make reasonable efforts to prevent such incidental data collection, the possibility still exists. If you believe that we have inadvertently collected your personal data, please notify us as soon as possible in accordance with this Privacy Policy.

6. Third Party Sites

Airlock Digital's website may contain links to other websites. We cannot control the privacy controls of third-party websites. Third party service providers may use their own cookies to collect data about your activities on the Airlock Digital website. Use of third-party sites is subject to the terms and conditions found on those sites.

7. Marketing

Airlock Digital may use personal data to market and promote its products and services, including to:

- contact you about special offers or promotions about our products and service we think may be of interest to you (where we have a legal basis to process your information in this way); and
- conduct marketing and web tracking analysis.

We may partner with third parties to conduct joint promotions or offer joint products, services, and discounts. If you provide us with personal data in relation to the promotion, product, discount, or service we are jointly providing with a third party we may share your data with that third party. We will inform you that we do this at the time we collect your personal data and you will be given a choice about whether or not this occurs.

If you do not want to receive direct marketing communications, you can opt-out at any time by contacting us using the contact details below. If you opt-out of receiving marketing material from us, we may still contact you in relation to our ongoing business relationship with you.

8. Disclosure of Personal Data

Airlock Digital may disclose your information to third parties to provide goods and services to you or us, research purposes to improve our operations and services, if permitted or required by law, or otherwise with your consent. Without limitation Airlock Digital may also disclose personal data to third parties where we have collected your information in relation to a jointly offered promotion, product or service.

When you access or use the Service, Airlock Digital may access, collect, monitor and/or remotely store 'location data,' which may include IP addresses, and/or similar information regarding the actual location of your device. Location data may convey to us information about how you browse our Website or use the Service, and does not collect or share any personal data about you. Location data may be used in conjunction with personal data. Some features of the Service, particularly any location-based services, may not function properly if use or availability of location data is impaired or disabled.

We may transfer your personal data in connection with the sale or merger or change of control of Airlock Digital or the division responsible for the services with which your personal data is associated.

We may share your personal data with an affiliate of Airlock Digital who is in the same corporate family as us so long as their privacy practices are substantially similar to ours.

Airlock Digital's service providers may be based in Australia or overseas. We only disclose personal data to our service providers in accordance with this Privacy Policy and applicable privacy laws. We do not authorise their use or disclosure of personal data for any other purposes other than in connection to the provision of their services to us.

Where Airlock Digital discloses personal data to third parties it will take all reasonable steps to require restrictions on the collection and use of personal data by those third parties.

9. Security

Airlock Digital takes the security of the personal data we hold seriously, and we take all reasonable steps to protect the personal data we hold from misuse, interference, loss, and unauthorised access, modification or disclosure. Airlock Digital applies both physical and information and communications technology security systems to protect the personal data we hold, both in physical and electronic form.

Airlock Digital also uses encryption technology to protect data and transactions where appropriate. Airlock Digital will take all reasonable action to investigate data breaches as soon as reasonably practicable, and where the GDPR applies within 72 hours of becoming aware of such breach, and in accordance with relevant law. Where the GDPR applies to you, when a breach of personal data is likely to result in a high risk to the rights and freedoms of individuals then Airlock Digital will notify the affected individuals without undue delay.

Airlock Digital is currently certified to ISO 27001 and attested against SOC 2 Type 2.

10. Protection for Children

We generally do not collect personal data from children under the age of 16. If at any time in the future we plan to collect personal data from children under 16, such collection and use, to the extent applicable, shall, when required, be done in compliance with the GDPR, the Children's Online Privacy Protection Act ("COPPA"), and all other relevant statutes, and appropriate consent from the child's parent or guardian will be sought where required by such laws. When we become aware that personal data from a child under 16 has been collected without such child's parent or guardian's consent, we will use all reasonable efforts to delete such information from our database.

11. Remaining Anonymous or Using a Pseudonym

Airlock Digital understands that anonymity is an important aspect of privacy and that in some circumstances some people may prefer to use a pseudonym when dealing with Airlock Digital. You have the right to remain anonymous or to use a pseudonym when dealing with Airlock Digital. However, for a significant proportion of our activities (e.g. responding to support tickets or enquiries) it may be impracticable for Airlock Digital to deal with individuals who have not identified themselves or who have used a pseudonym, and we may not be able to provide you with the service(s) you require.

12. Unsolicited Personal Data

When Airlock Digital receives unsolicited personal data, we will assess whether it is personal data that we could legally collect. If it is, we will treat it according to the APPs. If it is not, we will, if lawful to do so, destroy or de-identify it as soon as practicable.

13. Holding and Destruction of Personal Data

Airlock Digital will retain your personal data only to the extent necessary, which will depend on what the personal data is and the purpose for which it was collected. It may be necessary for us to retain personal data to comply with our legal obligations; or for insurance or audit purposes. When Airlock Digital no longer needs to retain personal data, and is lawfully able to do so, we will destroy or de-identify that data.

14. Access to Personal Data held by Airlock Digital

Airlock Digital will take reasonable steps to ensure that the personal data we collect, use or disclose is accurate, complete and up to date. You can help us to do this by letting us know if you notice errors or discrepancies in information we hold about you and letting us know if your personal details change.

You may request corrections to any personal data that Airlock Digital holds about you if you think that the data is inaccurate, out of date, incomplete, irrelevant or misleading. After receiving a request from you, we will take reasonable steps to correct your data.

You can request access to the personal data we hold about you by sending us an email at dpo@airlockdigital.com. We reserve the right to verify your identity before we provide access to your personal data.

If you believe the information Airlock has collected on you is incorrect, you are encouraged to contact us to update it. Any information that is no longer needed for the purposes specified in this Policy will be deleted. You may request to have your information updated or deleted at any point by emailing us at dpo@airlockdigital.com.

15. Opt-Out Requests

All unsubscribe or opt-out requests may be made by emailing us at support@airlockdigital.com or by clicking the “unsubscribe” link at the bottom of the email. We will process your request within a reasonable time after receipt. However, we are not responsible for, and in some cases we are incapable of, removing your personal data from the lists of any third party who has previously been provided your information in accordance with this Privacy Policy or your consent. You should contact such third parties directly.

16. GDPR

Where you are an individual residing within the European Union (EU) we use and collect your personal data in accordance with the GDPR, or where you are residing the UK, the GDPR as incorporated into English law and the Data Protection Act 2018.

Where we act as a data processor under the GDPR we offer our customers a Data Processing Addendum (DPA), which incorporates the EU Standard Contractual Clauses (“SCCs,” also known as the EU Model Clauses) and include Airlock Digital’s organisational measures.

If the GDPR applies to you, you have the following rights in addition to those set out in this Privacy Policy:

- the right of access to a copy of the personal data we hold about you;
- the right to require us to correct any inaccuracies in your personal data;
- the right to object to decisions about you being taken by automated means (although we do not make any decisions by automated means);
- where we have sought your consent, the right to withdraw your consent at any time; and
- the right to ask us not to process your personal data for direct marketing purposes.

You may also have the following rights in relation to your personal data in certain circumstances:

- the right to restrict or object to our use of your personal data;
- the right to require us to provide a copy of your personal data to others; and
- the right to require us to erase your personal data.

If you wish to exercise any of your rights please contact us at the details set out in section 20 below.

17. Privacy Rights for Residents of Certain States (United States)

Residents of certain states have rights to access, delete, correct, or opt-out from certain types of processing or sharing of their personal data. Depending on your state of residency and subject to certain legal limitations and exceptions, you may be able to exercise some or all of the following rights:

Access your personal data. You may request to access a copy of your personal data we maintain about you. Additionally, you may request more information about:

- the categories and specific pieces of personal data we have collected about you,
- the categories of sources from which personal data is collected, and
- the categories of entities with whom we share personal data.

You can also request more information about categories of entities who use your personal data for other purposes (for example, joint marketing, joint offerings, etc.) for valuable considerations. This information may be delivered by mail or electronically at your request.

Right to correct your personal data. You may submit a request to correct inaccurate personal data.

Right to delete your personal data. You may request that Airlock Digital delete your personal data. Deleting this data may impact our ability to provide services to you. Please also be aware that we will continue to maintain certain data when permitted by law to complete transactions on the Service, detect security issues, prevent illegal or fraudulent activities, identify and repair errors on the Service, comply with relevant laws and regulations, and for other internal and lawful purposes.

Right to opt-out from certain sharing of your personal data. As discussed in this Policy, Airlock Digital may disclose your personal data to our business partners who use it for purposes relevant to our services (for example, joint marketing, joint services offerings, etc.). However, we will not disclose your data to third parties for purposes unrelated to our Services in exchange of monetary value.

Right to limit the use and disclosure of sensitive personal data. In certain states, such as Virginia, we may collect and process “sensitive personal data” with your opt-in consent. For certain other states, including California and Utah, you may request that we limit the use and disclosure of your sensitive personal data to certain purposes that are permitted by law (for example, providing services to you, detecting security incidents, preventing illegal or fraudulent action, protecting your and other users’ safety, and maintaining the quality of services we provide. Please note that the definition of sensitive personal data varies from state to state, so your rights with respect to specific types of data will depend on your state of residency.

Right to appeal your request. Residents of certain states may appeal a decision by Airlock Digital to decline to take action on a privacy-related request by you within a reasonable time after your receipt of the decision.

Below is a summary of your rights based on your state of residency:

Colorado, Connecticut, and Virginia (effective as of July 1, 2023 in Colorado and Connecticut):

- Right to access, delete or correct your personal data
- Right to opt-out of sale of personal data for money
- Right to opt-out of targeted advertising
- No discrimination
- Right to appeal.

Utah (effective as of December 31, 2023):

- Right to access or delete personal data
- Right to opt-out of sale of personal data
- Right to opt-out of targeted advertising
- No discrimination.

California

- Right to access, delete correct or delete personal data
- Right to opt-out of sale of personal data
- Right to opt-out of sharing of personal data for targeted advertising
- Right to limit the use of sensitive personal data

- No discrimination.

Your Privacy Right Under the California Shine the Light Act

How to Know If My Data Has Been Disclosed for Direct Marketing Purposes:

Subject to certain limitations under California Civil Code § 1798.83, if you are a California resident and have an established business relationship with us, you may ask us to provide you with:

- a list of certain categories of personal data that we have disclosed to certain third parties for their direct marketing purposes during the immediately preceding calendar year, and
- the identity of certain third parties that received personal data from us for their direct marketing purposes during that calendar year.

To make such a request, please contact us at the following address:

600 W Peachtree St NW, Suite 1700, Atlanta, Georgia, 30308

or email us at dpo@airlockdigital.com

18. Communications with Airlock Digital

By providing your contact information through channels including but not limited to your email address and phone number (collectively the “Channels”) to us, you expressly consent to receive communications from us. We may use the Channels to communicate with you, to send information that you have requested or to send information about other products or services developed or provided by us or our business partners, provided that, we will not give your contact information to another party to promote their products or services directly to you without your consent or as set forth in this Privacy Policy. In some jurisdictions (such as California), these disclosures may be deemed a “sale” if made for valuable consideration.

By providing your phone number to us, you expressly consent to receive phone calls and/or text messages from us. We will not give your phone number to another party to promote their products or services directly to you without your consent or as set forth in this Privacy Policy.

By using the Services, you expressly consent to receive in-product communications from us.

Any communication or material you transmit to us by email or otherwise, including any information, questions, comments, suggestions, or the like is, and will be treated as, non-confidential and nonproprietary. Except to the extent expressly covered by this Privacy Policy, anything you transmit or post may be used by us for any purpose, including but not limited to, reproduction, disclosure, transmission, publication, broadcast and posting. Furthermore, you expressly agree that we are free to use any ideas, concepts, know-how, or techniques contained in any communication you send to us, as well as any data developed using the content of such communication, without compensation and for any purpose whatsoever, including but not limited to, developing, manufacturing and marketing products and services using such information.

19. No Rights of Third Parties

This Privacy Policy does not create rights enforceable by third parties, nor does it require disclosure of any personal data relating to users of the Service.

20. Contact Details

If you need to contact Airlock Digital regarding any privacy matter, you can email us at privacy@airlockdigital.com or write to us at:

Airlock Digital
Level 2
136 Greenhill Road
Unley SA 5061, Australia