



## Privacy Policy – Candoo Culture PTY LTD

Effective Date: 19/05/2025

### 1. Introduction

Candoo Culture PTY LTD (“we”, “us”, “our”) is committed to protecting your privacy and handling your personal information with transparency and care. This Privacy Policy outlines how we collect, use, store, and disclose personal information, in accordance with:

- The Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs)
- The General Data Protection Regulation (GDPR) (where applicable)
- Other relevant international privacy laws

We also comply with the Notifiable Data Breaches (NDB) scheme, which requires notification if a data breach is likely to cause serious harm.

### 2. What Personal Information We Collect

We may collect personal information including:

- Name, email, phone number, job title, and company information
- Industry and business characteristics
- Responses to surveys or feedback forms
- Information about your interactions with us or our Platform
- Technical data (IP address, device type, browser version, location)

In some cases, we may collect sensitive information, including:

- Wellbeing or mental health indicators
- Cultural background or identity
- Views on workplace behaviour or emotional responses

Sensitive information is only collected where necessary and with your explicit consent, in accordance with APP 3.

### 3. How We Collect Your Information

We collect personal and sensitive information through:

- Direct interactions (e.g. surveys, interviews, onboarding forms)
- Use of our website and Platform (via cookies and analytics)
- Third-party sources (e.g. business directories, public data, social media)

### 4. How We Use Your Information

We may use your information for the following purposes:

- Delivering consultancy services, reports, and cultural insights
- Aggregating survey data to generate individual or group-level metrics
- Research, analytics, and internal product development
- AI and machine learning improvements (using only anonymised and de-identified data)
- Marketing and communications (you may opt out at any time)
- Legal compliance and internal risk management

We will not use your information for any unrelated purpose without your consent.



## 5. Personalised Reports & Survey Insights

When you participate in a survey through our Platform, we may produce reports that:

- Include your name and role
- Summarise how you responded to certain questions (e.g., positive or negative indicators)
- Display aggregated insights based on group or team-level data

These reports never display your specific written answers, and we will not disclose your raw responses to third parties.

By completing a survey, you consent to the collection, analysis, and summarisation of your responses as described above.

Some survey questions may include sensitive information (e.g., about wellbeing or emotional experiences). By choosing to respond, you are providing explicit consent to our use of that data in accordance with this Policy.

If you do not wish to be identified in reporting, or to share certain data, you may contact us directly at [admin@candooculture.com](mailto:admin@candooculture.com).

## 6. Data Retention & Security

We store your data securely using encryption, limited access controls, and cloud-based protection.

- Personal data is generally retained for up to 7 years, or as required for legal or compliance purposes.
- After this period, data is permanently deleted or de-identified.
- You may request deletion at any time (unless retention is required by law).

## 7. Disclosure & Third-Party Sharing

We do not sell your personal information.

We may share your information with trusted third parties for the following reasons:

- Cloud service providers and secure storage platforms
- Analytics and insights tools (with anonymisation where possible)
- Research collaborators (for de-identified benchmarking)
- Legal authorities (where required by law)

If your data is transferred outside Australia (e.g., to a cloud provider), we ensure appropriate safeguards are in place — such as Standard Contractual Clauses (SCCs) under GDPR or similar protections.



## 8. Your Rights & Choices

Depending on your jurisdiction, you may have the right to:

- Access your personal data
- Correct inaccurate information
- Request deletion of your data
- Object to or restrict certain uses
- Request a copy of your data (data portability)
- Withdraw consent at any time

To exercise any of these rights, contact us at [admin@candooculture.com](mailto:admin@candooculture.com). We will respond within a reasonable timeframe and in line with applicable law.

## 9. Cookies & Tracking Technologies

We use cookies and similar technologies to enhance your experience, track usage patterns, and improve our services. You can control cookie settings via your browser preferences.

## 10. Updates to This Policy

This Privacy Policy may be updated periodically. When we make significant changes, we will notify you by email or via our website.

The current version is always available here [www.candooculture.com/privacy-policy](http://www.candooculture.com/privacy-policy).

## 11. Contact Us

For questions, feedback, or data-related requests, contact us:

Email: [admin@candooculture.com](mailto:admin@candooculture.com)

Business Name: Candoo Culture PTY LTD