



# Privacy Policy

## AssetLaunch

### Published version

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This Privacy Policy explains how AssetLaunch collects, holds, uses, discloses and otherwise handles personal information and related data in connection with the AssetLaunch platform, website, services and associated commercial operations.

### This Privacy Policy covers:

- what information we collect and how we collect it
- how we use and disclose information across the platform and engagement lifecycle
- how we handle de-identified, aggregated and derived data
- marketing, profiling, cookies and analytics
- storage, security, retention, access and correction rights

## 1. Scope and application

This Privacy Policy applies to personal information and related data handled by AssetLaunch in connection with the AssetLaunch platform, website, applications, communications, marketing activities, support functions and related services.

By accessing or using AssetLaunch, creating an account, submitting information, or otherwise interacting with our services, you acknowledge this Privacy Policy and consent to the handling of your information as described in it, to the extent consent is required by law.

## 2. What information we collect

We may collect personal information and related data including:

- identity and contact details such as name, email address, phone number, suburb, state, country, employer or business name, and role information
- profile, CV and capability information such as qualifications, certifications, licences, security clearances, work history, skills, rate expectations, availability, preferences and portfolio material
- verification, compliance and trust information such as identity documents, business details, insurance information, references, screening information and other information reasonably required for trust, safety, fraud prevention or commercial due diligence
- communications and interaction information such as enquiries, support records, messages, ratings, reviews, meeting notes, shortlist activity, saved profiles, team activity and dispute records
- device and technical information such as IP address, browser type, operating system, cookie identifiers, advertising identifiers, session data, event logs, feature interaction data and diagnostic information
- transactional, behavioural and marketplace information such as searches, clicks, views, shortlist behaviour, application activity, conversion activity, referral sources and other platform usage signals
- inferences, segments, scores, preferences, forecasts and analytics generated from the information above

## 3. How we collect information

We may collect information directly from you when you create an account, complete a profile, upload documents, communicate with us, interact with other users, respond to forms or campaigns, or otherwise use the platform.

We may also collect information automatically through cookies, pixels, tags, SDKs, local storage, event logging, session replay tools and similar technologies.

We may receive information from other users, employers, referees, service providers, identity or screening providers, payment providers, analytics and advertising partners, publicly available sources, corporate transaction participants and other lawful third-party sources.

## 4. Purposes of collection, use and disclosure

We may collect, hold, use and disclose information for purposes including:

- providing, operating, administering, maintaining and securing the platform and related services
- creating, managing and displaying accounts, profiles, saved lists, team functions, communications and engagement workflows
- facilitating introductions, hiring processes, project discussions, employment arrangements, subcontracting arrangements and related commercial services
- verifying identity, capability, eligibility, business information, trust and safety matters, and compliance with platform requirements
- improving product design, matching logic, search relevance, pricing, user experience, service performance and business operations
- preventing fraud, abuse, unauthorised access, policy breaches, platform manipulation and unlawful conduct
- communicating service updates, operational notices, reminders, surveys, offers, campaigns and direct marketing
- conducting internal research, reporting, benchmarking, forecasting, statistics, analytics, business planning and investment analysis
- creating aggregated, anonymised, de-identified, transformed, combined or modelled datasets and developing related analytics, reports, benchmarks, indices, audience segments and derivative products
- complying with legal obligations, responding to regulators, law enforcement or disputes, and protecting our rights, property, people, systems and commercial interests
- supporting mergers, acquisitions, restructures, financing, due diligence, asset sales or any actual or proposed sale of all or part of our business

## 5. Disclosure of information

We may disclose information to:

- clients, candidates and other users where necessary for platform functions, introductions, evaluations, engagements, support processes or commercial operations
- our related bodies corporate, advisers, auditors, insurers and professional service providers
- hosting providers, cloud providers, software vendors, analytics providers, communications providers, payment providers, identity providers, security providers and other contractors or service providers
- advertising, attribution, remarketing and measurement partners, where permitted by law and our settings
- actual or prospective buyers, investors, lenders, financiers, merger parties and transaction advisers in connection with an actual or proposed business transaction
- courts, regulators, law enforcement agencies and other persons where required or authorised by law, or where reasonably necessary to protect rights, safety, property or the integrity of the platform

## **6. De-identified, aggregated and derived data**

AssetLaunch may de-identify, anonymise, aggregate, transform, combine and derive data from personal information and platform activity. Subject to applicable law, AssetLaunch may use, disclose, licence, analyse, sell or otherwise commercialise de-identified, aggregated and derived datasets, as well as related analytics, benchmarks, reports, indices, audience segments, market insights and derivative products, for any lawful purpose.

Where we rely on de-identification, we will take reasonable steps intended to ensure the information is not reasonably identifiable before commercial use. No method of de-identification is completely risk free.

## **7. Direct marketing, profiling and advertising**

We may use personal information and platform data to send direct marketing, personalise content, assess likely interest in opportunities, measure campaign effectiveness, perform attribution, optimise acquisition and retention activity, and support audience development and commercial strategy.

Where required by law, we will provide consent or unsubscribe controls. You can also opt out of direct marketing by using the unsubscribe mechanism in the relevant communication or by contacting us.

## **8. Cookies, pixels and similar technologies**

We use cookies, pixels, tags, SDKs, local storage, event logging, session replay tools and similar technologies for authentication, fraud prevention, analytics, performance monitoring, preference storage, personalisation, lead attribution, advertising measurement and service improvement.

Some platform features may not operate properly if these technologies are disabled.

## **9. Overseas disclosure and storage**

Our service providers, contractors, related entities and data environments may be located in Australia, New Zealand and other countries.

We may disclose personal information to overseas recipients in connection with hosting, support, analytics, communications, identity checking, business operations, corporate transactions or other lawful purposes. Where applicable, we may rely on contractual protections, internal controls, technical measures and other reasonable steps, but overseas laws may differ from Australian law.

## **10. Data security and retention**

We take reasonable steps designed to protect information from misuse, interference, loss and unauthorised access, modification or disclosure. Measures may include access controls, encryption, authentication controls, logging, monitoring, vendor review, least-privilege access, secure development practices and incident response procedures.

We retain information for as long as reasonably necessary for business, legal, compliance, dispute, security, fraud prevention, backup, recordkeeping, analytics and product purposes. We may retain de-identified, aggregated and derived data indefinitely.

## **11. Access, correction and choices**

You may request access to or correction of personal information we hold about you, subject to lawful exceptions. You may also update certain information through your account settings.

Requests may be made to [admin@assetlaunch.me](mailto:admin@assetlaunch.me). We may need to verify identity before actioning a request.

## **12. Third-party information and user responsibilities**

If you provide us with personal information about another person, you must be authorised to do so and must ensure that person is aware that their information will be handled in accordance with this Privacy Policy.

You are responsible for ensuring that profile content, uploaded material and communications do not unlawfully disclose another person's confidential, personal or commercially sensitive information.

## **13. Children**

AssetLaunch is not intended for children under 18 years of age, and we do not knowingly collect personal information from children through the platform.

## **14. Changes and contact details**

We may update this Privacy Policy from time to time. The latest version will be published on the platform with its effective date. Continued use of the platform after an update takes effect constitutes acknowledgement of the revised policy.

For privacy enquiries or complaints, contact [admin@assetlaunch.me](mailto:admin@assetlaunch.me). If you are dissatisfied with our response, you may contact the Office of the Australian Information Commissioner.