

## Spacetalk School Communication Systems Privacy Policy

Updated: 18th April 2023

We are MGM Wireless Holdings Pty Ltd (herein referred to as 'Spacetalk'). We sell MGM School News Channel™, messageyou™, Watchlists™, Outreach™, Rollmarker™ and Smartsync™ ('Spacetalk Service'). This Privacy Policy explains how we collect, use, disclose, and protect information that applies to our services to Spacetalk Service users, owners and users of our associated software applications.

When you use Spacetalk, you trust us with your information. We are committed to keeping that trust. That starts with helping you understand our privacy practices and your choices regarding this information, in accordance with the Privacy Act 1988 (Cth) (Privacy Act) and the Australian Privacy Principles (APPs). Nothing is more important to us than our customers' safety and privacy. We take all reasonable steps to ensure that data in our possession or control is kept secure and not misused. Making our customers aware of our Privacy Policy is part of our commitment to providing you with the best possible service, so please take a moment to read the following policy and learn how we handle personal data.

We maintain and regularly review this Privacy Policy and take reasonable steps to comply with the Australian Privacy Act, all to the extent applicable and as far as is reasonably practical in the circumstances of managing our business. To ensure your personal information remains confidential, we communicate this Privacy Policy to all our employees and make this Privacy Policy readily available and accessible to all customers, clients, and service providers. Please note that italicised words and phrases in this Privacy Policy have the meanings ascribed to them in the Australian Privacy Act.

### ABOUT SPACETALK SYSTEMS

School News Channel™, messageyou™, Watchlists™, Outreach™, Rollmarker™ and Smartsync™ are owned by MGM Wireless Holdings Pty Ltd, a fully owned subsidiaries of Spacetalk Ltd, a Public Company listed on the Australian Stock Exchange (ASX company code: SPA) ABN 93 091 351 530.

Spacetalk Ltd management and corporate governance is strictly regulated by ASIC, ASX and other Australian Federal and State Government Agencies, and the company adheres to best practice corporate governance procedures and policies wherever possible.

### WHAT PERSONAL INFORMATION WE COLLECT, HOLD AND USE

We will only collect personal data from you if it is reasonably necessary to provide services to you. We will only collect personal data for the purposes for which we advised you we were collecting it for, or a related purpose, which would reasonably be expected or otherwise with your permission. Personal data we may collect and hold includes:

Personal Information:

- first name, last name, date of birth, gender, username, or similar identifier and title
- Contact Data: billing address, email address and telephone numbers
- Third-Party Contact Data: name (or nickname), phone number and photo (optional)
- Financial Data: payment card details or bank account details. We will do this by asking you to complete an application form. We may also ask you for this or similar information personally
- Transaction Data: details about payments to and from you and other details of products and services you have purchased from us
- Information necessary for a purchase or service request, to register for a seminar, or participate in an online survey, or to be included in the mailing list.
- Information necessary to support the function in our products, such as record of student, school, and parent/caregiver. We do not retain this information for any purposes other than recording attendances, routing messages, determining the physical location of students and their devices, and delivering other communication to the right school, parents, and caregivers.
- Your IP Address; the date, time and duration of your visit on our website; the number of pages you have downloaded; and the type of browser you use.

We will only collect sensitive information about you if it is considered reasonably necessary for us to collect such information for us to perform our functions or activities and you consent, or collection is required by law or another exception per Australian Privacy Act.

Other than as a communication, financial services, or location provider, we do not collect or use information relating to schools, school staff, childcare centres, students or their parents or caregivers.

We only use personal information about parents and school staff with their informed consent or as otherwise specified in this Privacy Policy. We use this information to keep them up to date on the latest product announcements, software updates, special offers, and other information.

From time to time, we may also use personal information to contact customers to invite other parents and caregivers to join or promote the Spacetalk systems or services, participate in a market research survey, so that we can gauge customer satisfaction and develop better products.

We do not use personal information for any other purpose.

HOW WE COLLECT YOUR PERSONAL INFORMATION

We will generally collect the above personal data from you directly. We also collect personal data from you in various ways, such as when you communicate with us, when you fill in an application or form or survey, if you apply for a job with us, if we provide a product or service to you, or when you participate in any of our activities. We may also retain any messages you send through the service. We use this information to operate, maintain, and provide to you the features and functionality of the services. We may also use this information to correspond with you, and to address any issues you raise about the services. We may also collect data and personal information about individual from third parties such as a school or government department.

#### THE PURPOSES FOR WHICH WE COLLECT, HOLD, USE AND DISCLOSE PERSONAL INFORMATION

We collect personal information, which is reasonably necessary for one or more of Spacetalk's service functions as noted above in this Privacy Policy and includes to:

- maintain your account and contact details;
- allow you to download and purchase our products and services;
- allow you to use and interacts with our products and services;
- process transactions and end user related information, including confirmations and invoices;
- conduct our business, generate content and provide customer support and payment options;
- communicate with you;
- provide you with access to protected areas of the site;
- conduct surveys to determine use and satisfaction;
- verify data for accuracy or completeness;
- improve the quality of our services and develop new ones;
- keep you posted on software updates, technical updates, security alerts and support and administrative messages;
- send marketing communication to you;
- conduct surveys to determine use and satisfaction;
- detect, investigate and prevent potentially unlawful acts or omissions or acts or omissions with the potential to breach our Privacy Policy or any other policy;
- comply with our legal obligations;
- combine or aggregate your personal data with data we collect from third parties and use it for the purposes set out in this Privacy Policy;
- protect a person's rights, property or safety;
- credit reporting purposes; and
- any other purpose made known in this Privacy Policy or other policy.

We will not use or disclose this data for a secondary purpose, unless you consent to us doing so, or under the circumstances involved we believe you would reasonably expect us to use or disclose the data for a secondary purpose and that that secondary purpose is related to the primary purpose.

In the event that we hold sensitive data about you, we will only disclose or use that data with your consent or if the use or disclosure is directly related to the primary purpose. Please note that we will also use or disclose your personal data or sensitive data if we are required to do so by law or a court/tribunal order; or if we reasonably believe that the use or disclosure of the data is reasonably necessary for an enforcement related activity or on behalf of an enforcement body, in which case we will make a written note of the use or disclosure or another exception applies under the Australian Privacy Act.

#### ANONYMITY AND PSEUDONYMITY

Spacetalk will allow its customers to transact with it anonymously or by using a pseudonym, wherever that is reasonable and practicable.

However, this will not be possible if Spacetalk is required or authorised by law or other instrument to deal with customers who have been appropriately identified; or where it is impracticable for us to deal with individuals who have not identified themselves or who would prefer to use a pseudonym.

#### WHO DO WE DISCLOSE YOUR INFORMATION TO?

Because Spacetalk is a part of global business and group of companies, information may be shared with other Spacetalk business units around the world. Information will be treated confidentially and only disclosed on a need-to-know basis.

Data will be protected in accordance with this Privacy Policy. We will not rent or sell your information into third parties outside Spacetalk and its group companies (including any parent, subsidiaries and affiliates) without your consent, except as noted in this section.

We work with other companies that help us provide our systems and services to our customers, and we may provide data to these companies for the purpose of providing the services and products to you and to facilitate our interests as stated above. Those service providers will only be provided with access to your information as is reasonably necessary for the purpose that we have engaged the service provider, and we will require that such third parties comply with our Standards and all applicable laws.

To enable us to provide you with data about our products and services we may disclose your personal data to credit reporting agencies and other third parties. The data we may disclose for credit reporting purposes includes, amongst other things:

- the fact that you have applied for credit and the amount;
- the fact that we are a credit provider to you; and
- payments which become overdue and for which debt collection action has started.

We may also use your personal data to:

- obtain from a credit reporting agency a credit report containing personal data about you in relation to commercial credit provided by us;
- obtain a report containing information about your commercial activities or commercial creditworthiness from a business which provides information about the commercial creditworthiness of a person; and
- obtain a report from a credit reporting agency and other information in relation to your commercial credit activities.

We may occasionally share contact information about its school or childcare clients (not personal information of students or their parents or caregivers) with carefully selected technology companies to keep customers informed about related products and services.

Spacetalk will not disclose any information about students or parents/caregivers unless:

- we believe or have reasonable grounds that the disclosure is necessary to prevent or lessen a serious and imminent threat to the life or health of the individual concerned or of another person; or
- the disclosure is required or authorised by or under law; or
- the disclosure is reasonably necessary for the enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of the public revenue; or
- another exception applies under the Privacy Act.

We may also disclose your personal data to third parties to whom you expressly ask us to send the personal data to or to third parties you consent to us sharing your personal data with.

## DEALING WITH UNSOLICITED PERSONAL INFORMATION

If we happen to receive personal data about you from a source other than you, or it is data provided by you which we did not request, we undertake to determine, within a reasonable period, if we could have requested such personal information in accordance and where applicable the Australian

Privacy Act. If this is the case we may then use, and treat, that information in the same manner as if we had collected it under the Australian Privacy Act (APP).

If we determine that we could not have collected the information under APP, we will undertake to destroy or de-identify that information, within a reasonable period.

#### WHERE WE STORE YOUR PERSONAL DATA

You have the right to know where your personal information is stored.

All your personal data is stored in Australia: The personal data we collect from you is stored on secure information technology systems located in Australia.

#### DIRECT MARKETING

Spacetalk will only use any personal information we hold on you for the purpose of direct marketing if:

- we collected the information involved;
- we believe you would reasonably expect us to use or disclose the information for direct marketing; and
- we provide an option for you to request that we do not use the information for direct marketing – and you have not utilised this offer.

If we collected the information (that is not sensitive information) involved from you and you would not reasonably expect us to use or disclose the information for the purpose of direct marketing, or we collected the information from someone other than you, we will only use or disclose the information with your consent or where it is impracticable to obtain your consent. Either way, we will provide you with a simple means by which you may request not to receive direct marketing communications from Spacetalk.

We undertake that when we do use or disclose any personal information we hold on you for direct marketing purposes, those direct marketing materials will provide you with an option to declare you do not wish to receive such material in the future. If requested, we will provide you with the source of any information we use or disclose for direct marketing purposes, whether that direct marketing be by us or another organisation; and we will provide you with the opportunity to request that we, or the other organisation, do not send direct marketing information to you. We will also not charge

for that request, and we will action it in a reasonable time frame. You may also request that we not use or disclose information to facilitate direct marketing by other organisations.

#### INTERNATIONAL TRANSFER OF PERSONAL DATA

We will not transfer personal information about an individual to anyone who is in a foreign country. Spacetalk advises that all information is stored domestically within Australia. We only use direct message routing to Australian communication providers. All our suppliers are required to commit to adherence with the Australian Privacy Principles.

#### *Policy on use of international communication carriers*

We use mobile phone carriers based in the country in which the school is located for our SMS communications. Where possible, we will do not deal with carriers that allow their services to be provided by offshore 'lowest cost' aggregators or carriers using unspecified routing. Using offshore carriers can present a very high risk of misuse of confidential student, parent/caregiver and school data and a potential breach of Privacy laws. Such services are also known to be unreliable and unsuitable for use when a student's safety is at risk.

#### IF WE CAN'T COLLECT YOUR PERSONAL INFORMATION

If you do not provide us with the personal information we have requested, we may not be able to provide you with an appropriate product or fulfil one of our primary functions and activities.

#### ADOPTION, USE OR DISCLOSURE OF GOVERNMENT RELATED IDENTIFIERS

As a general practice, we do not collect or use government related identifiers. In any event, we will not use or disclose a government related identifier unless it is reasonably necessary for an enforcement related activity by or on behalf of an enforcement body. We may also use or disclose a government related identifier related to you if we are allowed or required by law or regulation to do so.

#### QUALITY OF PERSONAL INFORMATION

We take all steps reasonable in the circumstances to ensure that the personal data we collect from you is accurate, up to date and complete. Where we collect data from you directly, we rely on you to supply accurate data and we may not consider that further steps are required. We will also ensure that all steps reasonable under the circumstances to ensure that the personal data we use or disclose is, when considered in relation to the purpose for which we are using or disclosing the data, accurate, up to date, complete and relevant.

#### PROTECTION OF PERSONAL DATA

We will take all reasonable steps to protect your personal data from misuse, interference, loss, unauthorised access, modification, and unlawful disclosure. Personal data that is no longer needed will be deleted or anonymised.

#### NOTIFIABLE DATA BREACH

In the event that there is a personal data breach, and we are required to comply with the notification of eligible data breaches provisions under Australian privacy laws, and/or any other regulations or legislation, we will take all reasonable steps to contain the suspected or known breach where possible and follow the following process set out in this clause.

We will take immediate steps to limit any further access or distribution where possible. If we have reasonable grounds to suspect that the data breach is likely to result in serious harm to any individuals involved, then we will take all reasonable steps to ensure an assessment is completed within 30 days of the breach or sooner, if possible.

If we reasonably determine that the data breach is not likely to result in serious harm to any individuals involved or any remedial action we take is successful in making serious harm no longer likely, then no notification or statement will be made.

Where, following an assessment and undertaking remedial action (if any), we still have reasonable grounds to believe serious harm is likely, as soon as practicable, we will provide a statement to each of the individuals whose data was breached or who are at risk. The statement will contain details of the breach and recommendations of the steps each individual should take. We will also provide a copy of the statement to the Office of the Australian Information Commissioner. We will then review the incident and take action to prevent future breaches.

#### YOUR RIGHTS OF ACCESS TO, CORRECTION OF, DELETION OF PERSONAL DATA

Under the privacy laws, you may have the right to:

- Request a copy of your information;
- Request that we correct inaccuracies relating to your information;
- Request that your information be deleted or that we restrict access to it;
- Request a structured electronic version of your information; and
- Object to our use of your information.



Should you wish to make a request in respect of your personal information, please contact us at [support@mgmwireless.com](mailto:support@mgmwireless.com).

In some circumstances, we may not be able to comply with a request that you make in respect of your personal data. For example, we may not be able to provide a copy of your information where it infringes on the rights of another User. We may also be required to retain certain information that you ask us to delete for various reasons, such as where there is a legal requirement to do so. In some cases, you may have shared your information with third parties, such as by publishing a design on a third party's website. In that case, we will not be able to delete the information, and you will need to contact that third party directly.

If we are unable to resolve your request, or if you are concerned about a potential violation, you may be entitled to report the issue or make a complaint to the data protection authority in your jurisdiction.

You may have specific rights in relation to your information depending on where you live.

#### CHILDREN'S PRIVACY

Whilst some of our products are aimed for child safety and supporting guardians and the holders of parental responsibility to monitor and protect their child's safety, we do not knowingly solicit personal information from children and the services are not offered to children.

#### PRIVACY – ENQUIRIES, REQUESTS, COMPLAINTS, BREACHES

Enquiries regarding this Privacy Policy or the personal data we may hold on you, should be made to our customer service team, whose contact details are below. If you think your personal data, held by us, may have been compromised in any way or you have any other Privacy related complaints or issues, you should also raise the matter with a representative of our customer service team as soon as possible. We will take all reasonable steps to ensure your claims are investigated and a formal response will be provided to you, within a reasonable time, considering the circumstances of your claims. If any corrective action is determined to be required, as a result of that investigation, we will take all reasonable steps to rectify the situation and advise you of such, again within a reasonable time considering the circumstances. If we do not resolve your enquiry, concern or complaint to your satisfaction or you require further information in relation to any privacy matters, please contact the relevant Supervisory Authority, whose contact details are below.

## Office of the Australian Information Commission

<b>Telephone</b>	1300 363 992
<b>Email</b>	<a href="mailto:enquiries@oaic.gov.au">enquiries@oaic.gov.au</a>
<b>Office Address</b>	Level 3, 175 Pitt Street, Sydney NSW 200, Australia
<b>Postal Address</b>	GPO Box 5218, Sydney NSW 2001, Australia
<b>Website</b>	<a href="http://www.oaic.gov.au">www.oaic.gov.au</a>

## Contacting Us

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<b>Postal Address</b>	Level 2, 104 Frome St, Adelaide SA 5000
<b>Website</b>	<a href="http://www.spacetalk.co">www.spacetalk.co</a>