



Atticus | Privacy Policy

Last updated: 23 May 2023

This privacy policy explains how we, Assemble Technologies Pty Ltd ACN 620 609 430 and our affiliates, including Assemble Technologies UK Ltd company no. 13893380 (collectively **Atticus**), process your personal information in connection with our services such as our website, content and features, or when you otherwise engage with us online or offline.

Individuals in the United Kingdom (**UK**) should also read the “**For UK Individuals**” section.

If you have any question about your data protection rights or if you do not understand anything explained in this policy, please contact us by email to legal@atticus.tech.

1. Who does this privacy policy apply to?

We process personal information relating to the following categories of individuals:

- our **users** who access our website, content, features or other online services;
- our **prospective customers** identified as such by us or our third parties;
- our registered users who are our **customers**;
- our **suppliers** and business **partners**;
- our job **applicants**; and
- **anyone else** who interacts with us, when you call, email or visit us or otherwise interacts with us.

In addition, as a service provider for our corporate customers, we handle personal information in documents uploaded to our services by our users and customers. However, we only process such personal information for purposes related to providing those services.

In relation to Assemble Technologies Pty Ltd, information that constitutes an ‘employee record’ of a current or former employee is not covered by this privacy policy.

2. What categories of personal information do we process?

Generally, “**personal information**” means any information that identifies you or relates to you, except for anonymised information that cannot reasonably be linked back to you.

Below we group personal information into categories which reflect our data processing activities and, we hope, offer the reader accessible transparency.

Category of personal information	Description
account details	Username, password, and similar information.
CCTV data	Image data recorded by our CCTV.
call recording data	A recording of your calls with us.
details of your query	Information in your query, complaint, job application or other communication.
device and browser details	Information automatically provided by your device and browser including mobile device ID, internet protocol (IP) address, cookie ID, online identifiers, operating system, browser type, language, time zone setting, location and date and time of access.
engagement information	Information about your engagement with our emails and other communications or with our content on the Internet including open

	rates, click rates, view rates, active time spent, survey data, feedback data and similar information.
general details	Your name, date of birth, address, email, telephone number, role and employer details if you are acting in your professional capacity and similar information.
identity details	Your passport details, image, social insurance number, tax payer ID and similar information.
professional opportunity records	Your personal and professional details as business customer and other opportunity records.
preferences and interests	Information about your preferences and interests known, observed or inferred from various sources.
public data	Publicly available information about you.
special categories data	Except for health and safety, diversity monitoring or for other important reasons, we do not intentionally, as part of our business practices, collect or process information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.
third party data	Information provided by third parties about your interaction with our posts and content and 'likes' on social media platforms, such as LinkedIn, your preferences and interests received from our advertising and analytics partners, references from your previous employer, referees, membership organisations and other third parties.
usage data	Information about how you navigate and engage with our online services, features including online activity data such as downloads, clickstream data with URLs visited previously, log data, page interaction, such as scrolling, clicks, and mouse-overs, methods used to browse away from our website, information in security logs and similar information.

3. Why do we process your information?

The section below explains what personal information is necessary for each purpose. We keep our processes and data collection under review and will update this privacy policy should any personal information no longer be necessary for the given purpose.

The lawful basis column explains to UK individuals how we comply with a technical legal justification for data processing under relevant data protection laws. Please contact us if you have any questions.

Purpose & description	Personal information	Lawful basis for processing (UK individuals only)
<p>To assist with your enquiries.</p> <p>For example, our sales team may respond to your request for a demo.</p>	<ul style="list-style-type: none"> - general details - account details - details of your query 	<p>Necessary for our legitimate interest in responding to enquiries, complying with the law and best practices or, as the case may be, necessary for taking steps prior to entering into a contract or the performance of our contract with you.</p>
<p>We may record our calls and meetings with you for compliance and record keeping purposes.</p> <p>For example, we may record calls with you in and out of our technology team.</p>	<ul style="list-style-type: none"> - general details - account details - details of your query 	<p>Necessary for our legitimate interest in documenting enquiries and business transactions for compliance, and governance purposes.</p>

Purpose & description	Personal information	Lawful basis for processing (UK individuals only)
<p>To provide our services to our users, such as our website, content, document review service and other services.</p> <p>For example, when you visit our website, your browser will provide your IP address, browser type and other technical information to enable us to display our content in a compatible manner. If you login we will verify your account before granting access.</p>	<ul style="list-style-type: none"> - general details - account details - device and browser details - usage data 	<p>Necessary for our legitimate interest in providing our services to the public and our customers, complying with the law and best practices or, as the case may be, necessary for the performance of our contract with you as our customer and compliance with our legal obligations.</p>
<p>To provide services as a service provider to third parties such as our customers and end users including a data room, collaboration tools, verification tools and similar online services.</p>	<ul style="list-style-type: none"> - any personal information in documents uploaded to our service 	<p>We will provide services as a so called "processor" in accordance with customer instructions and our legal obligations. Please see our <u>data processing terms</u> for more information.</p>
<p>To send you service communications about matters relevant to your use of our services and your engagement with us, such as surveys or other forms of active engagement, availability of new services, changes in our terms, etc.</p>	<ul style="list-style-type: none"> - general details - account details 	<p>Service communications are necessary for the performance of our contract with you or, as the case may be, necessary for our legitimate interest in satisfying your requests, facilitating our services and organising related activities.</p>
<p>To assess your job application and for business administration purposes.</p> <p>For example, if you apply for a job, we will review your CV, publicly available information about you, information from your previous employers, professional references, criminal and credit check and other information. We may use automated decision-making to eliminate applicants who fail to meet the basic criteria for a role.</p>	<ul style="list-style-type: none"> - general details - details of your query - public data - third party data - special categories data 	<p>Necessary for our legitimate interest in responding to your query and, as the case may be, necessary for taking steps prior to entering into a contract. Special categories data may be processed as is necessary in the context of employment and social security laws.</p>
<p>To understand our audiences and customer profiles for product and service development, research, market intelligence, marketing, advertising, content personalisation and business administration, as described below. Depending on purpose, we use your profile information in anonymised or pseudonymised or, when it comes to marketing by say email, identifiable form, e.g. your email address. In some cases, this will include information observed or inferred from your activity or other information about you.</p>	<ul style="list-style-type: none"> - general details - account details - device and browser details - usage data - public data - preferences and interests - engagement information - third party data - professional opportunity records (together "audience data") 	<p>Necessary for our legitimate interest in understanding our typical customer profiles and demographics, for service development, research, market intelligence, marketing, advertising, content personalisation and business administration.</p> <p>Where required by law, we rely on your consent to deploy cookies or similar technologies on your device or to read information on your device except where necessary</p>

Purpose & description	Personal information	Lawful basis for processing (UK individuals only)
		for essential services (please see our cookies notice).
<p>To develop our features, services and organisation based on pseudonymised surveys, usage data, reports and third party tools which may rely on pixels or similar scripts to measure relevant events.</p> <p>For example, analytics tools help us understand your country, age group, pages visited before and after and other statistical demographic information about you and other users. User navigation, hover over, role, actions, events and other user and usage data are used to decide which part of our services are not popular or may need further development. Information may also be used to develop personalisation, machine learning and similar features.</p>	<ul style="list-style-type: none"> - account details - device and browser details - usage data - engagement information 	<p>Necessary for our legitimate interest in product development and keeping our services relevant.</p> <p>Where required by law, we rely on your consent to deploy cookies or similar technologies on your device or to read information on your device except where necessary for essential services (please see our cookies notice).</p>
<p>To conduct industry research for internal and external use.</p>	<ul style="list-style-type: none"> - anonymised audience data 	<p>Necessary for our legitimate interest in utilising industry knowledge for strategic business decisions as well as sharing knowledge with the public.</p>
<p>To send you relevant marketing communications in accordance with the law about our existing and new products and services by email, text, push, post or other channels if you sign up for a demo, if you are our existing customer or, where required by law, if you give consent.</p> <p>Our marketing tools rely on cookies and similar scripts to track your interaction with our marketing messages, such as open rates or content clicked on, to optimise campaign performance.</p>	<ul style="list-style-type: none"> - general details - account details 	<p>We rely on your consent if you sign up or on soft opt-in (presumed consent) if you are our existing customer. You can unsubscribe at any time.</p> <p>Where required by law, we rely on your consent to deploy cookies or similar technologies on your device or to read information on your device except where necessary for essential services (please see our cookies notice).</p>
<p>To display relevant advertisements on websites, apps, social media and other inventory. Our advertising tools rely on cookies, similar scripts and advertising ID solutions and complex automated processes and decision-making. However, we use pseudonymised information that does not include your name or similar information, except in limited cases where your details such as your email address is needed to identify you on social media for advertising purposes.</p> <p>We rely on your customer profile data to understand your interests and preferences known, observed and inferred to design</p>	<ul style="list-style-type: none"> - general details - pseudonymised audience data 	<p>Where required by law, we rely on your consent to deploy cookies or similar technologies on your device or to read information on your device except where necessary for essential services (please see our cookies notice).</p> <p>Some of our marketing and advertising activities are necessary for our legitimate interest in understanding your interests from the information available to us, information observed or inferred and third</p>

Purpose & description	Personal information	Lawful basis for processing (UK individuals only)
<p>marketing and advertising campaigns that are relevant to you (also known as “profiling”, “personalisation” and “predictive analytics”), use an ID such as your hashed email address to identify you within third party datasets without actually disclosing your email and allocate your profile to relevant audience segments (also known as “matching”, “data enrichment”, “targeting”) or matching you against our typical customer profile (creating “lookalike audiences”), and measuring conversion events linked to your advertising ID to optimise campaign performance.</p>		<p>party information, in promoting our business and understanding campaign metrics.</p>
<p>To manage our professional relationship with you using our record management systems and engagement tools, identifying opportunities, contacting you by phone and sending you marketing communications.</p>	<ul style="list-style-type: none"> - general details - details of your query - professional opportunity records 	<p>Necessary for our legitimate interest in understanding and maintaining our business relationships and administering our business. You have the right to unsubscribe from marketing at any time.</p>
<p>To ensure proper administration of our organisation, including to:</p> <ul style="list-style-type: none"> • keep appropriate records about how our services are used; • resolve complaints; • conduct troubleshooting; • conduct equality monitoring; • ensure the health & safety and make reasonable adjustments to accommodate special needs; • register interactions with our communications, such as emails; • enforce our terms; • debt collection; and • similar purposes. 	<p>all information as is necessary and proportionate for the administration of our organisation</p>	<p>Necessary for our legitimate interest in the proper administration of our organisation and services and necessary for compliance with our legal obligations or activities in the substantial public interest.</p>
<p>To engage our third party service providers who may process your personal information on our behalf to facilitate the provision of our services and the fulfilment of essential service functions which we cannot fulfil ourselves, such as web hosting, cloud storage, IT, analytics, payments, plugins, communications, accounting, security, CCTV and others as well as our advisors such as lawyers, accountants, insurers and others.</p>	<p>all information as is necessary and proportionate to enable the relevant service</p>	<p>Some activities are necessary for the performance of our contract with you, others are necessary for our legitimate interest in ensuring the proper operation of our services.</p>
<p>To share information with our affiliated companies.</p> <p>For example, we may outsource certain functions to our affiliated companies or</p>	<p>all information as is lawful, necessary and proportionate</p>	<p>Necessary for our legitimate interest in using our group’s resources to organise, develop and deliver our services, run our organisation and decide on future strategies.</p>

Purpose & description	Personal information	Lawful basis for processing (UK individuals only)
engage in group-wide marketing campaigns.		
<p>To ensure health and safety at our premises.</p> <p>For example, depending on circumstances, we may introduce additional procedures to protect our staff from transmissible diseases.</p>	<ul style="list-style-type: none"> - special category data relating to health 	<p>Necessary for our legitimate interest in ensuring the health and safety of our staff and others, to comply with best practice or necessary for compliance with our legal obligations or activities in the substantial public interest.</p>
<p>To ensure the safety of people, security of our premises, the security of our systems and online services.</p> <p>For example, we may monitor our networks, website, systems and premises for suspicious activities, test and audit our systems, ensure compliance with our terms and deploy appropriate security measures.</p>	<ul style="list-style-type: none"> - device and browser details - usage data - CCTV data 	<p>Necessary for our legitimate interest in ensuring the security of our organisation, people and services and necessary for compliance with our legal obligations.</p>
<p>To share data with another organisation in accordance with the law for the purposes of a joint venture, collaboration, financing, sale, merger, reorganisation or similar event relating to our organisation.</p>	<p>all information as is lawful, necessary and proportionate</p>	<p>Necessary for our legitimate interest in acting in the best interest of our shareholders and investors and complying with our legal obligations.</p>
<p>To process and share information as is required for our compliance with the law or to establish, exercise or defend legal claims.</p> <p>To process and share information with other third parties where required by law, such as regulators, law enforcement agencies or where mandatory under a court order.</p>	<p>all information as is lawful, necessary and proportionate</p>	<p>Where processing or sharing your data is necessary for compliance with a legal obligation to which we are subject, to establish, exercise or defend legal claims, or, where necessary and proportionate, in order to satisfy our legitimate interest in complying with best practice or applicable laws.</p>

We will update you about any new purposes of processing of your personal information from time to time, and we will obtain your prior consent for such new purposes where we are required to do so at law.

4. Who else gets to see your data?

Where required in connection with the purposes set out above, we will share your personal information with third parties where it is necessary, proportionate and lawful, including with:

- our **third parties that provide services or advice to us**;
- our **marketing, advertising and analytics partners**;
- our **affiliated companies**;
- **third parties** who provide **additional services**, features or content to you, such as social media plugins;
- **other users** who you collaborate with in our document review and other services;

- persons or authorities where we are **compelled by law**, responsible practices or for legal claims;
- the relevant entity in case of a **merger, acquisition or collaboration**; and
- other third parties where you have provided your consent.

5. Third parties may process your personal information

Our services may contain links to other websites, third party services, such as LinkedIn and plugins. Some of the third parties who we share your personal information with, such as credit reference agencies, payment services providers or public authorities, process your personal information for their own purposes.

You should check the privacy statements of these third parties and we are not responsible for how they may process your personal information. Some of our third party service providers may use your anonymised personal information for business administration and product development purposes.

6. How long is your personal information kept?

We will keep your personal information for as long as is necessary for the purposes listed above or longer, as may be required by law. You may contact us for further details or request deletion of your personal information at any time.

The table below illustrates what general retention periods may apply to specific categories of personal information. However, the periods may vary depending on circumstances in accordance with the law.

Category of personal information	Retention period
account details, general details, call recording data	6 years from collection
CCTV data	30 days from capture
device and browser details, engagement information, preferences and interests, third party data, usage data	6 years from collection
professional opportunity records	6 years from collection
"customer personal data" held as processor on behalf of our customer	As per instructions in accordance with agreement

7. How do we secure your personal information?

We maintain appropriate organisational and technological safeguards consistent with best international standards to help protect against unauthorised use, access to or accidental loss, alteration or destruction of the personal information we hold.

We also seek to ensure our third-party service providers do the same. We only appoint service providers under appropriate contract who provide sufficient guarantees about data security in accordance with applicable law.

We will endeavour to use the least amount of personal information as is required for each purpose. We will employ pseudonymisation and anonymisation techniques, where appropriate.

Where appropriate, we apply security measures such as encryption or hashing when sharing your personal information with third parties.

Our staff will access your personal information on a "need to know" basis.

8. Where is your personal information processed?

Depending on whether you are dealing with us in Australia or the UK, your personal information will generally be held locally.

However, like most organisations, we use various services and tools and we collaborate with our affiliates and business partners in countries different to your country of residence, including Australia, the US, UK and EU, and we may transfer your personal information as a result.

Each recipient is subject to appropriate safeguards such as due diligence and the standard contractual clauses or similar contractual provisions for international transfers of personal information.

9. Opt-out

If you would like us to stop sending you marketing communications and to process your personal information for direct marketing purposes, please contact us.

You can request to stop receiving our marketing communications at any time by clicking on the unsubscribe link at the bottom of each marketing message and we will add you to a suppression list or otherwise arrange that you no longer receive marketing communications.

10. Accessing or correcting your personal information

You can access the personal information we hold about you by contacting us using the information below. Sometimes, we may not be able to provide you with access to all of your personal information and, where this is the case, we will tell you why. We may also need to verify your identity when you request your personal information.

If you think that any personal information we hold about you is inaccurate, please contact us and we will take reasonable steps to ensure that it is corrected.

11. Making a complaint

If you wish to make a complaint about the way we have handled your personal information, you can contact us via legal@atticus.tech. Please include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint within a reasonable period of time. If you remain unsatisfied with the way in which we have handled a privacy issue, you may approach an independent advisor or your local data protection authority for guidance on alternative courses of action which may be available.

12. Updates

If we make any changes to our privacy policy, you will be able to see them on this page. You should regularly check for updates, as indicated by the "Last updated" date at the top.

If you do not agree with the changes, please do not continue to use our website or services. Of course, if any such changes significantly affect you, we will ask for your prior consent where we are required to do so by law.

13. For UK individuals

This section provides further disclosures and describes the rights in relation to your personal data that you may have under UK data protection law if you are an individual in the UK.

A. Controller

Assemble Technologies UK Ltd of Unit 210-211 Canalot Studios, 222 Kensal Road, London, United Kingdom, W10 5BN will process your personal data as "**controller**" for the purposes and under the legal grounds for processing set out above.

As a service provider or "**processor**", we also process personal data in documents uploaded to our services by our users and customers. However, under our customer terms we are required to only process such personal data in accordance with our customers' instructions and we are unable to process it in any other way.

B. Personal data

“**Personal data**” means any information relating to an identified or identifiable natural person (**‘data subject’**); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

C. Data subject rights

Subject to certain exemptions, limitations and appropriate proof of identity, you will generally have the following rights in relation to your personal data:

- **Right to information** about matters set out in this privacy policy. You may also contact us for further details about our data retention policy and international data transfers.
- **Right to make an access request** to receive a copy of your personal information held by us.
- **Right to rectification** of any inaccurate or incomplete personal information.
- **Right to withdraw consent** previously provided.
- **Right to object to** our processing of personal information based on our legitimate interests such as processing for direct marketing purposes.
- **Right to erasure** of personal information that is no longer needed, for example, if you object to our profiling for advertising or personalisation purposes and also request erasure.
- **Restriction** on the processing of personal information, for example, where necessary while we deal with your enquiry.
- **Right to human intervention** in respect of any automated decision-making without human involvement that significantly affected you.
- **Right to data portability** from one service provider to another, where applicable.
- **Right to lodge a complaint** with the Information Commissioner’s Office.

All requests will be processed without undue delay and no later than within one month. If we cannot process your request within this period, we shall explain why and process it as soon as possible thereafter.