



**HardHat Limited**  
Privacy (External policy)

**1. PRIVACY POLICY**

HardHat is committed to protecting your privacy.

HardHat Limited and its subsidiaries and associated affiliates (“HardHat”) is committed to protecting your privacy. This Privacy Policy applies to only activities directly related to your use of the HardHat platform. Our privacy policy does not apply to any third parties’ websites or services that may be linked to the HardHat website from time to time. Prior to use of any third party service we strongly recommend that you read the third parties’ privacy policies prior to providing any information to such sites. HardHat has no responsibility or liability in connection with any third parties’ websites.

**2. COLLECTION, USE AND TRANSFER OF YOUR INFORMATION**

In order to use the HardHat service or if you request information from HardHat you must supply personal information. We collect information about your interaction with our website and our products including your personal information for all of our business purposes including but not limited to provision of service, improvement of our service and marketing and research.

You can visit most of the HardHat website without disclosing your personally-identifiable information (‘personal data’). However when you contact us, register for seminars, activities and programs available on our website, or request information or services from us, you may choose to provide us with personal data, such as your contact details. We may also collect other types of personal data indirectly through our customers’ use of our services.

If you supply us with the personal data of a third person, such as your spouse, colleague, friend or client, we accept that information on condition that you have given that third party all legally required notifications about our collection of the information, and have all rights required from that third party to provide the data to us to use for our business purposes.

HardHat may use suppliers to collect, process, store, use, analyse and/or transfer the data on its behalf. In such case, it is HardHat’s practice to require that these suppliers handle the personal data they process or transfer in a manner consistent with HardHat’s policies. By submitting the personal data to us, you acknowledge and agree with your data being processed and/or transferred on HardHat’s behalf by its suppliers.

### **3. IF YOU SUBMIT PERSONAL DATA TO HARDHAT**

We may collect, process and/or transfer the specific information you voluntarily provide to us in the contact form you choose to fill in on our website, including the personal data you provide. When using our services, our customers may provide us with the personal data of third persons, and we may also process and/ or transfer that data. As HardHat operates globally, any information (including personal data) supplied directly or indirectly to HardHat may be stored in a country outside of your own, transferred to other HardHat offices (including Australia and the United States of America) and may be accessed by service suppliers to HardHat anywhere. By submitting any personal data on HardHat's site, you authorise HardHat to use, process and transfer (if necessary across borders) such data, even in and to countries where the level of data protection may not be commensurate with the high standard of protection adopted by certain countries, such as the standard suggested by the EU Data Protection Directive and privacy legislation in Australia. In such countries, HardHat will still handle your personal data in the manner described in this Privacy Policy. HardHat will not sell personal data to third parties.

We execute agreements with our employees, contractors and service providers to require that all information we supply to them is maintained in accordance with this policy.

### **4. IF YOU ARE A CLIENT OR PART OF A CLIENT ORGANISATION, OR ARE A SUBCONTRACTOR**

Personal data you provide to HardHat, including personal data of a third party, such as your spouse, colleague, friend or client may be collected, stored, used and transferred as necessary for HardHat to carry out and improve its business or seek potential business in the future with your company. If you provide us with personal data, whether in the form of an e-mail, business card, orally during business meeting or otherwise, we confirm that we have accepted all third party personal information you submit on condition that you have all rights required and unrestricted permission from the third party to access and to transfer their personal data to us and that you have granted us a permission to collect, store, use and transfer such information with no limitations even in and to countries where the level of data protection may not be commensurate with the high standard of protection adopted by certain countries, such as the standard suggested by the EU Data Protection Directive and Australian Privacy Principles. We confirm that we have accepted all third party personal information you submit on condition that you have all rights required and unrestricted permission from the third party to access and to transfer their personal data to us.

## **5. DISCLOSURE REQUIRED BY LAW**

Please be aware that it is possible that personal data you provide to HardHat may be subject to disclosure under the law (e.g. to comply with statutory requirements, or particular court orders or subpoenas) in the countries in which HardHat operates.

## **6. CORRECTION, UPDATE AND DELETION OF THE PERSONAL DATA**

HardHat will provide you with a possibility to ensure that the personal data you provided to us is accurate and up to date. You can request correction, update and deletion of your personal information via e-mail sent to [privacy@HardHat.global](mailto:privacy@HardHat.global), and we will use reasonable efforts to contact you regarding your request. In case you chose to be on a mailing list for periodic email updates regarding HardHat services and events, you also can use this e-mail address ([privacy@HardHat.global](mailto:privacy@HardHat.global)) to send us a notification that you no longer want to receive such information. We will honour your choice and refrain from sending you such announcements. You may change your choice at any time. To update or delete your data or correct an inaccuracy, we may ask you to verify your identity and cooperate with us in our effort.

## **7. SECURITY OF YOUR PERSONAL INFORMATION**

HardHat uses various organisational and technical measures to protect your privacy and avoid unauthorised use or disclosure of your personal data. However, you should note that no transfer of data over the Internet is completely secure. While we use reasonable efforts to protect your data on our systems, when the data is transferred over the Internet, it may be accessed and used by unauthorised third parties. HardHat has no control over the performance, reliability, availability or security of the Internet and does not warrant that any information transfer via the Internet or any communication through the Internet is secure. HardHat shall not be liable for any disclosure, unauthorised use, loss, damage, expense, harm or inconvenience resulting from the loss, delay, interception, corruption, intervention, misuse or alteration of any personal information due to any reason beyond HardHat's reasonable control.

## **8. COMPLAINTS**

If you are concerned that we have breached a privacy law or code binding on us, please send an email to [privacy@HardHat.global](mailto:privacy@HardHat.global). We aim to respond in a reasonable time (normally 30 days). Our Privacy Officer will manage your complaint and will give you additional information about how it will be handled.

## **9. COOKIES AND WEBSITE TRACKING**

We use cookies and other tracking devices to gain an insight into the content that our various audiences are interested in. They do not allow us to identify individuals, just IP addresses which do not reflect individual user information. This enables us to adjust our website and content accordingly.

A cookie consists of information sent by a web server to a web browser, and stored by the browser. The information is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser. We may use both “session” cookies and “persistent” cookies on the website. We will use the session cookies to keep track of you whilst you navigate the website. We will use the persistent cookies to enable our website to recognise you when you visit.

We use Google Analytics and Trovus Dashboard to analyse the use of our website. Google Analytics and Trovus Dashboard generate statistical and other information about website use by means of cookies, which are stored on users’ computers. The information generated relating to our website is used to create reports about the use of the website. Google and Trovus store this information.

Most browsers allow you to refuse to accept cookies. For example, in Internet Explorer you can refuse all cookies by clicking “Tools”, “Internet Options”, “Privacy”, and selecting “Block all cookies” using the sliding selector. This will, however, have a negative impact upon the usability of many websites.

## **10. UPDATES TO THIS POLICY**

We reserve the rights to update this Privacy Policy at any time. It was last updated on 24 November, 2020