

# Privacy Policy

## QUEENSLAND XR HUB

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### 1. Summary

- 1.1. Queensland XR Hub takes **privacy matters seriously** and will only collect and process your information to fulfil a **contractual obligation or legitimate reason** relating to our business.
- 1.2. Queensland XR Hub collects personal and sensitive data about you when you create an account or with cookies. The **personal data** collected is information which **identifies you**, used to **allow us to** provide you with services. The **sensitive data** is information about

your appearance and ethnic origin, used to measure our compliance with diversity obligations with government agencies.

- 1.3. We do not share any information with any third parties unless we need to fulfil a **legal obligation** or as required for running or updating of our **IT services**.
- 1.4. This policy addresses privacy rights under Australian, UK and European Privacy Law. Such rights include **access to and control over your data**.
- 1.5. You can **contact us** for any privacy queries and to make a complaint. You also have rights to submit **complaints to your relevant governing body**.

## **2. Basic Details and Definitions**

- 2.1. This Privacy Policy is version 1.0 and current as of 13 SEPTEMBER 2021.
- 2.2. This page informs you of our policies regarding the collection, use and disclosure of personal data when you use our Service and the choices you have associated with that data.
- 2.3. For information about Cookies we use, please see our separate Cookie Policy [here](#).

### **We / Us / Our**

- 2.4. We are QUEENSLAND XR HUB Pty Ltd ACN 644 478 062 ("we", "us", or "our").

## **Website / Site**

2.5. Our Website or site is: [www.qldxrhub.com](http://www.qldxrhub.com).

## **Service**

2.6. The Service is our business services and the operation of the Website.

## **Personal Data**

2.7. Personal Data means data about a living individual who can be identified or reasonably identified from those data (or from those and other information either in our possession or likely to come into our possession).

## **Sensitive Data**

2.8. Sensitive Data means personal information that includes information or opinions about an individual's beliefs, personal preferences or affiliations.

## **Usage Data**

2.9. Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

## **Cookies**

2.10. Cookies are small files stored on your device (computer or mobile device). When you visit our website, we may collect information

from you automatically through cookies or similar technology. For more information, visit [allaboutcookies.org](http://allaboutcookies.org) and our [Cookie Policy](#).

## **Controller**

- 2.11. Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information is, or is to be, processed.
- 2.12. For the purpose of this Privacy Policy, we are a Controller of your Personal Data.

## **Diversity Obligations**

- 2.13. We have contractual obligations to meet Key Performance Indicator ("KPI") targets for diversity inclusion. Specifically we have targets for the inclusion of:
- Regional members (members from rural areas);
  - Women; and
  - Aboriginal or Torres Strait Islander ethnic identities.

## **Experts in Residence Program**

- 2.14. Is a service offered from time to time to our customers where they can book in to meet with professionals across a range of business support and advisory areas.

## Hub Office Location

2.15. Means our physical premises located in:

The Precinct, 315 Brunswick Street

Fortitude Valley, QLD 4006

Australia

## Processors (Or Service Providers)

2.16. Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Controller.

2.17. We may use the services of various Service Providers in order to process your data more effectively.

## Data Subject (Or User)

2.18. Data Subject is any living individual who is using our Service and is the subject of Personal Data.

## The Office of the Australian Information Commissioner (OAIC)

2.19. The OAIC is the principal body which administers Australia's privacy laws and the Australian Privacy Principles.

2.20. The OAIC website is: <https://www.oaic.gov.au/>

## The Australian Privacy Principles (APP)

2.21. APP is used in this policy to refer to the Australian Privacy Principles contained in Schedule 1 of the *Privacy Act 1988* (Cth). These APPs govern the content of privacy policy and rights under Australian law.

## The European Economic Area (EEA)

2.22. EEA refers to the contracting parties of the European Economic Area as established by the Agreement on the European Economic Area (Document 21994A0103(01)). This area covers the European Union ("EU") and some other zones deemed part of the EU's economic area.

## The General Data Protection Regulation (GDPR)

2.23. GDPR refers to the *General Data Protection Regulation* (EU 2016/679) ("**GDPR**") and if applicable, the corresponding privacy laws in the United Kingdom ("UK").

2.24. If you are a resident or citizen of the European Economic Area (EEA) or the UK, then the applicable GDPR provisions will also apply to the data and information we collect about you, regardless of whether you are currently physically located in the EEA or UK or from where you're accessing the Services from.

## Do Not Track (DNT)

2.25. The "Do Not Track" ("DNT") is a preference you can set in your web browser to inform some websites (which support this technology) that you do not want to be tracked.

2.26. You can enable or disable Do Not Track by editing the preferences or settings in your applicable web-browser.

## 3. Your Consent and Identity

- 3.1. We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy.
- 3.2. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our [Terms and Conditions](#).
- 3.3. Please note, should you engage our Services, we do not support pseudonymous or anonymous interactions.

## 4. What Types of Data We Collect

### Personal Data

- 4.1. While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("**Personal Data**")
- 4.2. Personal Data we collect includes:
  - First and Last Name
  - Signatures
  - Addresses
  - Phone Numbers
  - Email Address
  - Company Name
  - Location data
  - Date of Birth

- Cookie Usage Data, more information about which is set out in our Cookie Policy available from the link under heading 2 above.

## Sensitive Data

4.3. We collect any information which may be classified as Sensitive Information from the website.

4.4. Sensitive Data we collect includes:

- Photographic image captures;
- Voice and audio captures; and
- Race or ethnic origin

## Usage Data

4.5. We may also collect information on how the Service is accessed and used ("**Usage Data**").

4.6. This Usage Data may include information such as the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers, and the source of user traffic and other diagnostic data.

# 5. Why We Collect and Use Data

## General Purposes for Collection

5.1. Generally, we collect data for the following purposes:

- For us to fulfil our contractual obligations with you.
- As our agency is tied to local, state and federal Australian government bodies, as well as industry stakeholders, we are contractually required to collect and retain data in order to



comply with the standards required by these bodies, including meeting appropriate security standards and complying with relevant laws, regulations and rules/industry codes.

- To provide you with marketing information about Services and events we think you may be interested in, unless you have chosen not to receive this information. This marketing information will be provided to you through the newsletter or via other electronic/email communication formats.
- For us to detect, prevent and address any technical issues which may affect our Services.
- For us gather analytic data so that we can improve our Service through cookies.
- For us to monitor how our Service is used through cookies.
- To provide you with customer support to ensure you can use the Service.
- To allow you to interact with the Service.
- To measure our compliance and fulfilment of our Diversity Obligations.

## Specific Purposes for Collection

5.2. In addition to the above general purposes, we specifically collect:

- **Personal Data** to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you through email. You can opt out of receiving any, or all, of these communications from us by following the unsubscribe link or the instructions provided in any email. We

also collect your gender and location to assist with ensuring we meet our Diversity Obligations.

- **Sensitive Data** for:
  - Confirming your identity and providing our marketing services, regarding **photograph** data (this data will not be distributed to third parties without a release being signed by you); and
  - To ensure compliance with Diversity Obligations from our agreements and those of our agents, regarding **race or ethnic origin** data.
- **Usage Data** to analyse our Services, and tailor our Services to meet your needs, for example having variations in the website display to suit the preferences of different web-browsers.

## Legal Bases for Processing Personal Data under the GDPR

5.3. For any users to whom the GDPR applies (see definitions), we collect Personal Data or information on following legitimate legal grounds:

- You have given us permission to do so
- We need to perform a contract with you (provide you with Services)
- The processing is in our legitimate interests and it is not overridden by your rights
- To comply with any applicable laws (some of which are detailed below under the heading “Disclosure of Data” - Legal Requirements).

5.4. The particular ground(s) relied on for each instance of data collection, will vary based on the type of data and the context in which it is collected. Above we've provided details on what, when and why data is collected, where these grounds are referred to, (using similar but not exactly the same wording, to give a better sense of the grounds in case one wording/phrasing isn't clear for a user).

## **6. When and On Whom Do We Collect Data**

### **Data Collected in the Following Cases**

- 6.1. We collect Personal Data on users of our Services when they:
- register an account by becoming a member and registering your name, email address and company name.
  - respond to customer surveys or voluntarily provide us with information.
  - sign up to receive newsletter emails.
- 6.2. We collect Sensitive Data on users of our Services when they:
- Submit a tender application.
- 6.3. We collect Usage Data on users of our Services when they:
- Use or view our website (via your browser's cookies).

### **Tenders**

6.4. We often collaborate with businesses to offer tenders. With tenders we collect any information provided to us in tender submissions, including:

- First and Last Name.
- Address
- Phone Number
- Email Address.
- Any other Personal and/or Sensitive Information you provide.

6.5. More information to the tenders will be provided in a pdf (or other suitable form) and hosted on Google Drive. For more information on Google Drive's privacy policy, please see <https://policies.google.com/privacy>.

## **Accessing the Hub, Events or Services**

6.6. For security general marketing reasons and to measure our compliance and fulfilment of our Diversity Obligations, we may collect your data:

- should you visit the Hub Office Location, or attend an event hosted by us or our affiliates (whether the event is held in-person or virtually)
- during the booking process for our events and/or Experts in Residence Program and/or other services which we may offer from time to time.

## **Data is Not Collected for Children**

6.7. Our Service does not and is not intended to address or target any persons under the age of 15 ("Children").

6.8. We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian

and you are aware that your Child has provided us with Personal Data, please contact us via our contact details below.

- 6.9. If we become aware that we have collected Personal Data from children without verification of parental consent, we will take steps to remove that information from our servers.

## **7. How We Handle Data**

- 7.1. Your consent to this Privacy Policy means you've acknowledged you understand and consent to transfer the retention, storage, transfer and disclosure of data as provided below.

### **Data Retention**

- 7.2. As our services are data-driven and relate to the XR-industry in Queensland, we aim to retain data indefinitely, that is without any defined retention period after which the data will be destroyed. This can both help track the performance of our services to improve them in the future, as well as providing important statistics to government and industry bodies to assess the health and development of the Queensland XR-industry over time.
- 7.3. Despite our aim for indefinite retention, you may make a request for data to be de-identified or destroyed in accordance with your privacy rights (see later sections below on your rights and contact details). Please note however, that:
- In Australia some data may need to be retained for a period of up to seven (7) years to comply with applicable laws

(legislation) and time periods for taking legal action (sometimes referred to as “statute of limitations”); and

- In order to balance the public interest in retaining important industry trends, we may, as permissible by law, opt to de-identify data instead of deleting it.

7.4. Based on our data storage capacity over time, we may elect to archive data for retrieval and use later.

7.5. Please also see our Cookie Policy for specific retention periods for cookies used in our Services.

## **Data Storage and Transfer**

7.6. Depending on your location data may be transferred to, and maintained on, computers, servers or other records located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

7.7. Data collected, including back-ups, may be stored in the following locations:

- In Australia (in physical and electronic formats)
- Using third-party, cloud-storage services

7.8. If you are located outside Australia and choose to provide information to us, your data will be transferred to Australia and processed/stored here.

7.9. With third-party, cloud-storage services:

- The individual data packets will be likely stored in an encrypted format, on servers located in different territories, as determined from time to time by the third-party providers.
- As this data should only be accessible by us (and the cloud-storage provider, to the extent it is for legitimate maintenance and support reasons) the *information* contained in the data is stored in Australia, as it is only at this location where the data packets can be compiled to reveal the information.
- If you'd like more information on the third-party services we use, please get in touch with us using the contact details (see below).

## Data Disclosure

7.10. We will disclose data to our internal staff and employees in order to provide our Services.

7.11. Participants at events may have their details shared with co-hosts and presenters to improve the effectiveness of these services.

7.12. We may disclose your data when collaborating with, or using the services of, Third Parties (see under "Third Parties" heading for more details on this).

7.13. We may disclose your data with Queensland and Australian Government bodies.

7.14. We may disclose your data if we are involved in a merger, acquisition or asset sale. We will provide notice before your Personal Data is transferred and becomes subject to a different Privacy Policy.

7.15. We may disclose your data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

7.16. We may disclose your data to third parties (including legal advisors) where we believe, in the good faith, that such action is necessary to:

- Comply with a legal obligation
- Protect and defend our rights or property
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of users of the Service or the public
- Protect against legal liability

## **Data Security**

7.17. The security of your data is important to us and we will take steps to protect against and promptly address security issues, once we're aware of them.

7.18. Despite our efforts, no method of data storage is full proof. As such you should consider these risks when using our Services and conducting your activities online.



## 8.Third-Parties

### Service Providers (general)

- 8.1. We may employ third party companies and individuals to facilitate our Service ("Service Providers"). Below are the categories for these parties and what data they may need. We provide the data under terms of confidence in collaboration. We do not sell any data to third-parties.
- 8.2. Information Technology, Website and Digital Agencies
- These third-parties help us administer our computing and website systems.
  - These parties may have access to your data in order to perform maintenance and/or repair of our systems, and when conducting security audits to ensure your data is securely held.
- 8.3. To clarify, these third-parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

### Google Analytics

- 8.4. We use Google Analytics to monitor and analyse the use of the Service. While Google Analytics is a third-party Service Provider, the information lies within our Service domain and linked to our Service.
- 8.5. Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared

with other Google services. Google may use the collected data to contextualise and personalise the ads of its own advertising network.

- 8.6. You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visits activity.
- 8.7. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>.

## **Google reCAPTCHA**

- 8.8. We use Google reCAPTCHA v2 ("I'm not a robot" Checkbox) to prevent spam and "bots" from submitting information to our site.
- 8.9. Google reCAPTCHA will ask you to fill out a puzzle before proceeding. This puzzle will be difficult for "bots" or other malicious software to complete.
- 8.10. Google's privacy policy for Google reCAPTCHA is included in their Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>.

## **Links to Other Sites**

- 8.11. Our Service may contain links to other sites that are not operated by us. If you click a third party link, you will be directed to that

third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

8.12. We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

## **9. Our Processes and Your Rights**

### **How we advertise and Communicate with You**

9.1. We may use remarketing services to advertise on third party websites to you after you visited our Service. We and our third-party vendors use cookies to inform, optimise and serve ads based on your past visits to our Service.

9.2. We send advertisements and/or communications to you via:

- Opt-in and opt-out marketing emails using express and implied permissions from:
  - Filling in a subscribe to our newsletter form;
  - Signing up as a member;
  - Using our Services or attending an event hosted by us or our affiliates.

9.3. All advertisements will identify us as the sender.

9.4. All emails will have an 'opt-out' or 'Unsubscribe' link you can use to disable us sending marketing content to you, which will be complied within five (5) business days.

- 9.5. For more information on Australian spam law requirements, please refer to the Australian Communications and Media Authority: <https://www.acma.gov.au/spam-and-telemarketing>
- 9.6. For more information on the UK requirements please see refer to the Privacy and Electronic Communications Regulations and the Data Protection Act: <https://ico.org.uk/for-organisations/guide-to-pecr/what-are-pecr/>

## **Our Policy On “Do Not Track” (DNT) Signals**

- 9.7. Our Services do not support DNT web-browser settings. This means that if you do not want to be tracked, you'll need to contact us with a privacy enquiry (see our contact details below)

## **Rights under the APPs**

- 9.8. If the APPs apply to you (see definitions), you have particular legal data protection rights.
- 9.9. You have the right to request access to Personal Information we hold for you (APP 1.4)
- 9.10. You can submit complaints to us using our contact details below (see contact details); for digital notices we accept multiple formats of Word, PDF and RTF documents (APP 1.6)
- 9.11. You can also lodge a complaint with the OAIC if the privacy/data issue hasn't been resolved.
- 9.12. For more, please see: <https://www.oaic.gov.au/privacy/australian-privacy-principles/australian-privacy-principles-quick-reference/>

## Rights under the GDPR

9.13. If the GDPR applies to you (see definitions) you have particular data protection rights. We have summarised those rights below and you can find further information on the website of the Data Protection Authority in your country.

9.14. We provide you with privacy information at the time we collect personal data from them, via this privacy policy (Right to Be Informed)

9.15. In certain circumstances, you have the following data protection rights:

- You may access, update or delete any information we hold on you. You will be able to change some information we hold in your account settings. Otherwise, please contact us for us to assist you.
- You may rectify information that is incorrect or incomplete.
- You may request us to restrict our processing of your data.
- You may request a copy of the information we hold on you.
- You may withdraw your consent for us to process your data (Right to be Informed). Please note that this will mean that many features of our Service will be unavailable, such as logging in.

9.16. Please note that we may ask you to verify your identity before responding to such requests.

9.17. You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more

information, please contact your local Data Protection Authority in the European Economic Area (EEA).

9.18. If you are located in the UK, you have the right to submit a complaint to the UK Information Commissioner. For more information, please visit [ico.org.uk](https://ico.org.uk).

## **10. Changes to this Privacy Policy and Obtaining a Copy**

10.1. We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

10.2. We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

10.3. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

10.4. You can download this policy as a PDF using the link at the beginning of this document. Reasonable requests for sending this policy in other formats/circumstances can be made via a request to us (see Contact Us below).

## 11. Contact Us

11.1. If you have any questions about this Privacy Policy, the data we hold on you, or you would like to exercise one of your data protection rights, please contact us.

• Company:	Real Serious Games Pty Ltd ACN 135 965 098 (as operator of the XR Hub)
• Attention:	Emma Murtagh
• Title:	Operations Manager
• Email:	<a href="mailto:privacy@qldxrhub.com">privacy@qldxrhub.com</a>
• Postage:	C/- Macpherson Kelley Lawyers L16 324 Queen Street Brisbane 4000

END OF POLICY

*This Privacy Policy has been prepared with our legal team at [Macpherson Kelley Lawyers](#).*