

# Policy 003 – Privacy

Application	Company wide
Effective Date	01/02/2025

Rivor Advisory Pty Ltd (RIVOR) may rescind, vary or replace the policy at any time at its absolute discretion.

## 1. WARM WELCOME FROM RIVOR ADVISORY

Welcome to RIVOR Advisory and thank you for visiting us. We provide a wide range of professional and advisory services to help organisations harness the power of their people to improve performance.

We wrote this Privacy Policy to give you a better understanding of how we collect, use, disclose and store your personal information. Please read it carefully as it gives you an understanding of our privacy practices.

By accessing or using RIVOR Advisory, you agree to be bound by this Privacy Policy.

## 2. INTRODUCTION

In this Privacy Policy, "RIVOR", "our" "we" or "us" means Rivor Advisory Pty Ltd (ACN 616 116 888) - the owner and operator of [www.rivor.com](http://www.rivor.com), [www.stream-insights.com/](http://www.stream-insights.com/), other RIVOR platforms, and its related bodies corporate (Websites). This Privacy Policy relates to how we collect, use, disclose and store your personal information that you supply to us by accessing our Websites, and using our services.

We are committed to protecting your privacy through compliance with the Privacy Act 1988 (Cth) ("Privacy Act"), the Australian Privacy Principles ("APP"), the General Data Protection Regulation ("GDPR") and any other privacy laws applicable to our Websites.

Where our Websites contain links to third-party websites, these sites are not governed by this Privacy Policy. We are not responsible for their operation, or their information privacy practices so we recommend that you read their privacy policies.

## 3. TYPES OF DATA AND INFORMATION WE COLLECT

### 3.1 Personal information

We access, collect and hold your personal information from our visitors and members to provide you with a personalised, insightful and rewarding experience. We also collect personal information from you in the context of providing professional advisory services to your employer or service provider, including without limitation, when you complete any forms provided to you by us on behalf of your employer.

'Personal information' when used in this Privacy Policy has the meaning given to it in the Privacy Act but it generally means any information that can be used to personally identify you. When you use our services or access any of our Websites, the type of personal information we collect includes your name, email address, age or date of birth, details of your organisation, your employer, and your current role. At times, we may collect information or an opinion about you or another individual that is reasonably identifiable, whether the information or opinion is true or not and whether the information is recorded in material form or not.

Your personal information will only be used and stored for the primary purpose for which it was collected and not for any other purpose, unless where we have obtained your consent to use the information for additional purposes under clause 4 of this Privacy Policy.

Sensitive information is any information about a individual's racial or ethnic origin, political opinion, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record, health information, genetic information, biometric information or biometric templates.

We will not ask you to disclose sensitive information, but if you elect to provide sensitive information, then it will also be captured and stored in accordance with this Privacy Policy.

### 3.2 Log data

When you use our Websites, our servers record information including information that your browser automatically sends whenever you visit a website, or that your mobile app automatically sends when you're using it ("log data"). This log data includes device identifiers, device type, geo-location information, connection information, statistics on page views, traffic to and from our platforms, mobile network information, time, date, referring URL, the type of operating system and browser, ad data, IP address, server address, date and time of your visit to our Websites, information of documents you download, pages visited, search terms, cookie information, and standard web log data.

The log data may be processed for the purposes of operating our platforms, providing our services, ensuring our security, maintaining back-ups of our databases and communicating with you.

### 3.3 Cookies and other similar technologies

To capture log data, we may use cookies and similar technologies like pixels, web beacons and local storage to collect and store personal and non-personal information about how you use our Websites.

Cookies are files that store information on the device on which you are using or accessing our platforms. Cookies also retain your details and preferences, so you can easily continue your browsing session upon return to our platforms. If you do not want to activate cookies, you can opt-out of receiving them by amending the settings of your internet browser, although you may find that some parts of our platforms will consequently have limited functionality and personalisation if you do so! By using our Websites, you agree to the use of these tracking technologies.

We try our best to handle any information collected by cookies in the same way that we handle other personal information described in this Privacy Policy.

### 3.4 Third party analytics tools

Third-party analytics tools collect non-personal information such as how often you visit our Websites, the web pages you visit, add-ons, and other analytics data that assists us in improving our services. These tools might include Google Analytics, Google AdWords conversion tracking, Google Tag Manager, or Facebook Ads conversion tracking. Third-party cookies may be placed on your computer by a service provider, for example, to help us understand how our Websites are being used. Third-party cookies may also be placed on your device by our business partners to advertise the service to you elsewhere on the Internet.

We reserve our rights to modify, add or remove any third-party analytics tools. By using our Websites, you consent to the processing of any non-personal data these tools will collect in the way and for the purposes described above.

## 4. LEGAL BASIS OF OUR DATA PROCESSING (IN OTHER WORDS, WHY WE COLLECT YOUR DATA)

We collect, store, use and disclose your personal information through lawful and fair means, so we can perform our business activities. The legal basis for our processing of your personal information and other data is based on:

- your consent through your voluntary submission of the information and agreeing to these terms or ticking "Submit Form" button on our Websites
- the information being necessary for the performance of a contract to which you are a party (primary purpose)
- for carrying out pre-contractual measures
- the information being necessary for the purpose of providing you with our content, products and services

- any other legitimate interests as detailed in this Privacy Policy

By using our Websites, you provide your consent to us processing your personal information for secondary purposes that could reasonably be anticipated at the time your information was collected and are related to the primary purpose of collection, including (without limitation):

- providing anonymised and aggregated data for data analytics, data modelling and data reporting as part of our services
- for internal operations such as record keeping, database management, data analytics or training
- creation and sending of marketing and promotional messages and other information that may be of interest to you
- verifying your identity, investigating any complaints related to you, or if we have reason to suspect that you are in breach of any of our terms and conditions of our services or Websites
- managing, researching and developing our products and services

We may also use personal information to meet our internal and external audit requirements, information security purposes, and as we otherwise believe to be necessary or appropriate:

- under applicable laws, regulations or government directions, which may include laws outside your country of residence
- to respond to requests from courts, tribunals, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence
- to protect our rights, privacy, health, safety, property, or those rights of other persons or the public

## 5. IF YOU CHOOSE NOT TO PROVIDE YOUR INFORMATION TO US

We respect your privacy and personal choice when it comes to your data. You can choose not to provide us with your personal information or use a pseudonym. However, this may mean that:

- we will not be able to provide you with our services, or be limited in how we can do so
- we will not be able to interact with you
- we may be unable to process and open an account for you
- we will not be able to properly investigate or resolve any complaint you submit

## 6. OTHER WAYS WE COLLECT, USE AND DISCLOSE YOUR INFORMATION

Use and disclosure of your information will only be made in accordance with APP 6.

### 6.1 Collection from third parties

To use your information in accordance with this Privacy Policy, we may also collect your personal information from third parties including:

- your employer
- service providers
- credit reporting bodies
- marketing companies
- referrals who may have referred you to us
- organisations with whom we have an agreement to share information for marketing purposes

### 6.2 Disclosure of personal information

We take reasonable steps to ensure that personal information is only accessible by people who have a genuine "need to know" as well as "right to know".

If we disclose your personal information, it will only be for the primary purpose for which it was collected or for a related secondary purpose where you would reasonably expect us disclose the information. We may disclose personal information, and you consent to us disclosing your personal information, to the following parties:

- our employees, related bodies corporate and employees of those entities
- our business partners
- third parties and contractors who provide services to us, including debt-recovery functions, IT service providers, marketing and advertising services
- payment systems operators
- our sponsors or promoters of any competition which we conduct
- any third parties authorised by you to receive information held by us, including your employer
- government, regulatory and law enforcement agencies as required, authorised or permitted by law

When you provide your personal information to us, you consent to the disclosure and processing of your information outside of Australia (such as to our data hosting, business operators and IT service providers based overseas) and we will take reasonable steps to ensure that any overseas recipient will deal with such personal information in a way that is consistent with applicable privacy laws but you acknowledge that the overseas entity may not be bound by the same level of laws and regulations as the Privacy Act.

### 6.3 Automated individual decision-making

If you reside in the European Union or EFTA States, you shall have the right not to be subject to a decision based solely on automated processing, including profiling, as long as the decision is not necessary for entering into, or the performance of, a contract between us, or is not authorised by Union or Member State law to which we are subject, or is not based on your explicit consent. If you wish to exercise your rights, please contact us using the details provided in clause 11 of this Privacy Policy.

## 7. DATA SECURITY

### 7.1 Anonymity, destruction and de-identification

We will allow our users to transact with us anonymously or by using a pseudonym wherever that is lawful and practicable.

We destroy or permanently de-identify personal information which is no longer needed in accordance with the APP 11, unless we are otherwise required or authorised by law to retain the information for a period of time.

We will not attempt to match de-identified or anonymous data collected through surveys or such online devices as "cookies", without your consent. By providing us your personal information, you consent and agree to our cookies-related activities as set out under clause 3.3 of this Privacy Policy.

### 7.2 Data quality and security

We take reasonable precautions to ensure that the personal information we collect, use, store and disclose is accurate, complete, relevant and up-to-date. However, the accuracy of that information depends to a large extent on the information users provide. That's why we recommend that you:

- let us know if there are any errors in your personal information
- keep us up-to-date with changes to your personal information such as your name, email or address.

You may change your personal details by using the relevant facility on our Websites or by contacting us (contact details provided in clause 11).

We try our best to ensure your personal information is protected from loss, misuse, unauthorised access, modification or disclosure (via measures such as firewalls, data encryption, virus detection methods, and password restricted

access). However, we cannot guarantee the absolute security of your personal information (it's the Internet after all!). In the event of a data breach, we will attend to the reporting requirements that apply to us. We cannot accept responsibility for the misuse, loss or unauthorised access to, your personal information where the security of information is not within our control.

### 7.3 Notifiable Data Breach Scheme (NDBS) and GDPR notification rules

If you reside in Australia, in the event that there is a data breach and we are required to comply with the Notifiable Data Breach Scheme (NDBS) of the Privacy Act, we will take all reasonable steps to contain the suspected or known breach where possible and follow the process set out in this clause.

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. We will follow the guide published by the Office of the Australian Information Commissioner (if any) in making this assessment. 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.

In the case of a personal information breach that affects an EU citizen, we shall without undue delay and where feasible, not later than 72 hours after having become aware of the breach, notify you and the Information Commissioner's Office, unless the breach is unlikely to result in a risk to your right and privacy.

## 8. CHOICES YOU HAVE ABOUT YOUR INFORMATION

You may contact us to request access, correct, delete or update your personal information. We may, in accordance with the APP, refuse to provide you with access to your personal information if, for instance, granting you such access would have a negative impact on the privacy of another person. We will endeavour to respond to all requests for access to your personal information within 30 days, or within a reasonable time of receiving your request. We will provide your personal information in the manner requested, unless it's impractical or unreasonable to do so.

You can ask us to stop using your personal information, including when we use your information to send you marketing emails or push notifications. These communications may be sent in various forms, including mail, over the phone, via SMS or via email, in accordance with applicable marketing laws. If you opt out of receiving marketing messages from us, we may still send you newsletters and updates about your account. We only send you marketing material if you've agreed to it, but if you'd rather we don't, you can easily unsubscribe at any time by following the opt-out instructions provided in the communication.

You may have your information, where technically feasible, sent to another organisation, where we hold this information with your consent or for the performance of a contract with you.

We will not normally charge a fee for processing a request unless the request is complex or is resource intensive. We do, however, reserve the right to charge an administration fee to cover our expenses in dealing with your request.

## 9. ASSIGNMENT, CHANGE OF CONTROL AND TRANSFER

All of our rights and obligations under our Privacy Policy are freely assignable by us to any of our affiliates, in connection with a merger, acquisition, restructuring, or sale of assets, or by operation of law or otherwise, and we may transfer your information to any of our affiliates, successor entities, or new owner.

## 10. CHANGES TO OUR POLICY

We may change this Privacy Policy from time to time and if we do, we'll post any changes on this page. If you continue to use our Websites after those changes are in effect, you agree to the new Privacy Policy. If the changes are significant, we may provide a more prominent notice or get your consent, as required by law.

## 11. CONTACT US

If you have any feedback or questions about this Privacy Policy, any privacy related dealings with us, complaints, a possible breach of your privacy or would like further information about our information management practices, you can contact us in writing here:

Privacy Officer: Sam Hall

Rivor Advisory Pty Ltd

PO Box 533 Port Melbourne Vic 3207

sam.hall@rivor.com

We will endeavour to respond to all queries within 30 days of receiving your request, or within a reasonable time from receiving your request.

If you wish to raise a concern about our use of your information you have the right to do so with your local supervisory authority, a list of which can be found here. [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en)

This Privacy Policy was last updated on 30 January 2025.