



Aurora's Privacy Policy (Australia)

Current as at: November 2021



This privacy policy sets out how the Aurora Energy Research Pty Ltd (“**Aurora**”) uses and protects any personal information that you give Aurora when you use this website, contract for any services that we provide, or otherwise interact with us from Australia. In this privacy policy, “**Aurora Group**” refers to Aurora and its related bodies corporate from time to time.

Aurora is committed to ensuring that your privacy is protected. Should we ask you to provide certain personal information by which you can be identified when interacting with us, you can be assured that it will only be used in accordance with this privacy policy, any other applicable policies, and Australian privacy laws.

Changes to Privacy Policy: Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We will post any changes on our website and, if the changes are significant, we will provide a more prominent notice (which may include email notification of Privacy Policy changes). We will also keep prior versions of this Privacy Policy in an archive for review by you on request. This Privacy Policy was last updated on the date set out on page 1.

Contents

1. Who we are	3
2. What we collect	3
3. How we collect your personal information	4
4. What we do with the personal information we gather.....	5
5. Security & Retention	7
6. How we use cookies	7
7. Links to other websites.....	8
8. Controlling your personal information.....	8
9. Sharing your personal information.....	10
10. International Transfers	10
11. Further Information	11

1. Who we are

Aurora Energy Research Pty Ltd is responsible for collecting, using, or disclosing your personal information.

We are bound by the *Privacy Act 1988* (Cth) (Privacy Act) and the Australian Privacy Principles (APPs) (collectively the **Privacy Laws**) because we handle the personal information of Australian individuals. This policy explains how and why we collect, use, hold and disclose your personal information.

We have appointed an information privacy manager. If you have any questions about this privacy policy or our information protection practices, please contact our information privacy manager+

CONTACT DETAILS

Carol Kriel, Office Manager, Email address: privacy@auroraer.com

Postal address: Aurora Energy Research Pty Ltd, Suite 6.01, Level 6, 332-342 Oxford Street, Bondi Junction, NSW 2022.

2. What we collect

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not. It does not include personal information which cannot be connected to an identifiable individual (anonymous information).

There are different types of personal information about you which we might collect, use, store, or transfer. We have grouped these together as follows, and provided some illustrations of the type of personal information which might fall into each group:

- **Identity Information** could include your first name, maiden name, last name, username or similar identifier, marital status, title, date of birth or gender;
- **Contact Information** could include your billing address, delivery address, email address, telephone numbers or another unique identifier for use with electronic communications;
- **Financial Information** could include bank account and payment card details;
- **Transaction Information** could include details about payments to and from you and other details of products and services you have purchased from us;
- **Technical Information** could include your internet protocol (IP) address, your login information, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and information about other technology on the devices you use to access this website;
- **Profile Information** could include your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses;

- **Usage Information** could include information about how you came to and leave our website, and how you use our website, products and services; and
- **Marketing and Communications** Information could include your preferences in receiving marketing from us and your communication preferences.

We can also collect, use and share inferred personal information such as statistical or demographic information for any purpose. Inferred personal information is information that could be derived from your personal information but is not considered personal information under law as this information will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Information to calculate the percentage of users accessing a specific website feature. However, if we combine or connect inferred Information with your personal information so that it can directly or indirectly identify you, we treat the combined information as personal information which will only be used in accordance with this privacy notice.

We do not usually expect to collect any sensitive categories of Personal Information about you as this is information we do not require from you (this includes details about your: race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric information). Nor do we collect any information about criminal convictions and offences.

Neither our website nor our services are intended for children, and we do not expect to process the information of anyone under 18 years of age.

3. How we collect your personal information

We use different methods to collect information from and about you including through:

- **Direct interactions:** You may give us your Identity, Contact and Financial Information by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal information you provide to us when you:
 - visit our website;
 - ask for information about our products or services;
 - create an account on our Aurora EOS platform;
 - express an interest in a career with us;
 - request marketing to be sent to you;
 - register for our events; or
 - or give us feedback or contact us.
- If any personal information that you have provided to us subsequently changes, we

will endeavour to update the records as quickly as we can, so please let us know promptly;

- **Automated technologies or interactions:** As you interact with our website, we will automatically collect Technical Information and Usage Data about your equipment, browsing actions and patterns. We collect this personal information by using cookies, server logs and other similar technologies. Please see our cookie policy (click [here](#)) for further details. This is inferred personal information that we may gather about you when you engage with our business online or by other means, and under the Privacy Laws we are obligated to protect these forms of personal information;
- **Generated Information:** We may generate Transaction, Usage, Marketing and Communications Information about you, by way of records of the direct and automated interactions that you have with us or our website, unless you tell us not to (eg if you 'opt out'); and
- **Third parties:** We may receive personal information about you from various third parties such as:
 - a) analytics providers;
 - b) lead generators and referrers; and
 - c) search information providers.

4. What we do with the personal information we gather about you

We require this personal information to understand your needs and provide you with a better service, and in particular for the following reasons:

Purpose/Activity	Type of information	Lawful basis for processing including basis of legitimate interest
To register you as a new customer or a user of the Aurora EOS platform	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to provide you with access to our products and services)

<p>To administer aspects of our contract with you including:</p> <ul style="list-style-type: none"> • Manage billing and invoicing together with associated payments • Collect and recover money owed to us • Internal record keeping 	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary for our legitimate interests (to recover debts due to us) • Necessary for our legitimate interests (the good administration of our business and supporting regulatory compliance)
<p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> (a) Notifying you about changes to our terms or privacy notice (b) Asking you to leave a review or take a survey 	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Profile (d) Marketing and Communications 	<ul style="list-style-type: none"> (a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services in order to improve them)
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Technical 	<ul style="list-style-type: none"> (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation

<p>To customise the website content to your preferences and to email marketing to you and measure or understand the effectiveness of the advertising we serve to you</p> <p>To contact you with invitations to/information about events that we organise or participate in</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about new products, special offers or other information that may be of interest to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p> <p>(d) Usage</p> <p>(e) Profile</p> <p>(f) Marketing and Communications</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>
<p>To manage our relationship to you as an employer</p>	<p>(a) Identity (including government identifiers)</p> <p>(b) Contact</p> <p>(c) Financial</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated)</p>

If you do not provide us with your personal information, we may not be able to provide you with our services, communicate with you or respond to your enquiries.

5. Security & Retention

We store most information about you in computer systems and databases operated by

either us, the Aurora Group or our external service providers (eg Salesforce). Some information about you is recorded in paper files that we store securely.

We implement and maintain processes and security measures to protect personal information which we hold from misuse, interference or loss, and from unauthorised access, modification or disclosure. For example, we have built our website using industry-standard encryption and authentication tools to protect the security of personal information.

We also use technological measures such as secure routers and firewalls to help protect personal information, as well as secure information systems requiring passwords, multi-factor authentication, and administrative access controls. Information collected through the website is encrypted before it travels over the Internet using industry-standard technology for conducting secure online transactions. Unfortunately, because of its nature, we cannot guarantee against the loss or misuse of personal information transmitted over the Internet.

We will only keep your personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances we will anonymise your personal information (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

In the event you pass away, we will continue to hold and manage the personal information you have provided us for the allocated period as outlined under the Privacy Laws, after which we will permanently delete that information.

6. How we use cookies

We use cookies on the website. A cookie is a small text file that the website may place on your device to store information. We may use persistent cookies (which remain on your computer even after you close your browser) to store information that may speed up your use of our website for any of your future visits to the website. We may also use session cookies (which no longer remain after you end your browsing session) to help manage the display and presentation of information on the website. You may refuse to use cookies by selecting the appropriate

settings on your browser. However, please note that if you do this, you may not be able to use the full functionality of the website.

Aurora uses Universal Analytics cookies to compile usage reports and to help improve the company website. The cookies collect information in an anonymous form, including the number of visitors to the website, where visitors have come to the website from and the pages they visited. This type of personal information is referred to as 'inferred personal information', which is another form of information about an individual that is treated as personal information.

Aurora uses Cloudflare security cookies to help identify trusted web traffic from shared IP addresses, it is essential in helping us identify trusted web traffic to the company's website. To learn more about Aurora's cookie policy, read [here](#).

7. Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we are not responsible for the protection and privacy of any personal information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement or notice applicable to the website in question before providing your personal information

8. Access to and correction of your personal information

You may choose to restrict the collection or use of your personal information in the following ways:

- if you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by following the opt-out instructions provided in our communication to you (eg clicking the 'unsubscribe' link in any email that you receive from us); or
- you can also write to or email us at privacy@auroraer.com

COMPLAINTS: If you have a complaint about the way in which we have handled any privacy issue, including your request for access or correction of your personal information, you should contact us. Our contact details are set out below. We will consider your complaint and determine whether it requires further investigation. We will notify you of the outcome of this investigation and any subsequent internal investigation.

In addition, under certain circumstances, you have rights under information protection laws in relation to your personal information including the right to receive a copy of the personal information we hold about you and the right to make a complaint at any time to the Office of the

Australian Information Commissioner's (OAIC), the Australian supervisory authority for information protection issues (<https://www.oaic.gov.au/>).

These rights include the right to:

- Request access to your personal information (commonly known as a “information subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.;
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected, though we may need to verify the accuracy of the new information you provide to us;
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request;
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;
- Request restriction of processing of your personal information. This enables you to ask us to suspend the processing of your personal information in the following scenarios:
 - If you want us to establish the information's accuracy;
 - Where our use of the information is unlawful but you do not want us to erase it;
 - Where you need us to hold the information even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - You have objected to our use of your information but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal information to you or to a third party. We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you; and
- Withdraw consent at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out

before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

HOW TO EXERCISE YOUR RIGHTS: You may access or request correction of the personal information that we hold about you by contacting us. Our contact details are set out below. There are some circumstances in which we are not required to give you access to your personal information. You can e-mail us at privacy@auroraer.com or write to us at Aurora Energy Research Pty Ltd, Suite 6.01, Level 6, 332-342 Oxford Street, Bondi Junction, NSW 2022 . Please mark any correspondence “Information Subject Rights Request”.

NO FEE USUALLY REQUIRED: You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if reasonable in the circumstances.

WHAT WE MAY NEED FROM YOU: We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that your personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND: We try to respond to all legitimate requests within a reasonable time. Occasionally, there may be delays if your request is particularly complex or you have made a number of requests. We will promptly correct any personal information found to be incorrect. In this case, we will notify you and keep you updated.

9. Sharing your personal information

We may disclose your personal information to entities within the Aurora Group, as well as our agents or sub-contractors for the purposes identified in this Privacy Policy (or any purpose specifically notified to you at the time of collection).

We require all third parties to respect the security of your personal information and to treat it in accordance with the Privacy Laws. We do not generally allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

We will not sell, distribute or lease your personal information to third parties unless we have your express and informed consent or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting, or share your personal information directly with them to enable them to do so, if you tell us that you wish this to happen. You can change your mind about this at any time.

We may provide your personal information (to the limited extent necessary) to third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal information in the same way as set out in

this privacy policy.

We may disclose your personal information without your permission to the extent that it is required to do so by law, in connection with any legal proceedings or prospective legal proceedings, and in order to establish, exercise or defend its legal rights.

10. International Transfers

We share your personal information within the Aurora Group. This may involve transferring your information outside Australia to an entity within the group located in the UK, Germany, the US, Spain, France, Italy or Sweden. In addition, some of our external third parties (eg suppliers, cloud computing vendors) are based outside of Australia so their processing of your personal information will involve a transfer of information outside of Australia (eg the UK and the US).

Whenever we transfer your personal information out of Australia, we are obligated to ensure a similar degree of protection is afforded to it by ensuring the following safeguards are implemented:

- disclose the type(s) of information that need to be disclosed and for what purposes;
- a requirement that the overseas recipient complies with the Australian Privacy Principles (APPs) in relation to the collection, use, disclosure, storage and destruction or de-identification of personal information. The overseas recipient will be contractually bound to enter a similar contractual arrangement with any third parties to whom it discloses your personal information to;
- a provision outlining a complaint handling procedure to follow in the event there is unauthorised access, loss or a breach;
- We will only transfer your personal information to countries and other jurisdictions that have been deemed to provide an adequate level of handling and protecting personal information by the Federal Australian Government.
- Where we use certain service providers, we may use specific contracts which give personal data the same protection it has under GDPR.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal information out of Australia.

11. Data Privacy Breach Management

In the event that we suspect there has been a data breach that is likely to result in serious harm to any individuals, we will:

- carry out a reasonable and expeditious assessment as to whether there has been such a breach, taking all reasonable steps to complete such assessment within 30 days of

- becoming aware of the suspected breach; and
- if such a breach has occurred, we will notify the Privacy Commissioner and the affected individuals as soon as practicable.

12. Further Information

If you have any questions about this privacy notice or the processing of your personal information by Aurora Energy Research Pty Ltd, or the Aurora Group generally, please contact:

Meng He, Legal Counsel

Email: privacy@auroraer.com

Address: Suite 6.01, Level 6, 332-342 Oxford Street, Bondi Junction, NSW 2022