

Leadership Approaches Survey (LAS) Privacy Policy

This policy was last updated on 23 August 2018.

Maestro Communications Pty Ltd ("Maestro Communication", "Maestro", "we", "us"), an Australian private company, offers an online Leadership Approaches Survey ("LAS") for diagnostic use in leadership coaching, training and development.

The copyright for this LAS diagnostic rests with Professor Ian C. Woodward, who is Chairman of Maestro and the researcher who developed the LAS. If you are undertaking the LAS, it is likely you are doing so at the request of a communication and leadership professor, teacher or coach, who is working with you to improve or develop your communication and leadership skills. This person is a Registered LAS User. Maestro Communication is your Data Controller because we collect and process data from you when you undertake the LAS using the site. This privacy policy describes how we collect, use and disclose that data.

The domain website <u>www.surveylas.com</u> is registered with Melbourne IT registry in Australia and site hosted by them to enable people undertaking the LAS ("Survey Participants", "you", "your") to enter information online. The back-end survey is housed with Google Cloud services under Maestro's administration.

This Privacy Policy should be read in conjunction with our Terms and Conditions for using the LAS.

1. Data we Collect

We collect the personal data you provide to us when you undertake the LAS ("your personal data"). This data includes your name, email address, certain demographic information and the information you input to answer the 95 proprietary LAS questions.

We do not collect data about you from any source other than you.

We do not collect browser or device data; nor do we use cookies or tracking technology to collect data.

2. How we use your Personal Data

We treat your personal data with confidentiality. We use your personal data to create a report for your Registered LAS User (such as your professor, teacher or coach) to share with you as a LAS result report for your communication preference styles. We do not use your data to contact you or interact with you, either directly or indirectly, unless you specifically request us to do so.

We use data, including your personal data, to analyze, improve and modify our services. We may also use your personal data anonymously, with all identifying information removed, for our own research purposes, such as to further improve future versions of the LAS.

3. How we Disclose Data

Maestro does not sell, rent or share any of your personal data with any third parties. We do not share your LAS results report with anyone other than your Registered LAS User and you. We do not share the specific information and answers you input to the LAS questions with your Registered LAS User or with anyone else.

The only exceptions to this would be should we believe it necessary:

- under applicable law, or payment method rules;
- to enforce our terms and conditions;
- to protect our rights, privacy safety or property, and yours; and
- to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities.

4. Security

Maestro uses reasonable organizational, technical and administrative measures to protect personal and all other data within our organization. If you have reason to believe that the security of your data residing with us is no longer secure, please contact us immediately using the contact information in section 8 below.

5. Jurisdiction and Cross-Border Transfer

Maestro is an Australian-based business, but its services are global. Therefore, data, including personal data, may be transferred to Maestro personnel, and stored and processed by Maestro in any country where we operate. We will take all reasonable measures to ensure that any such transfers comply with applicable data protection laws and your data remains protected to the standards described in this Privacy Policy.

6. Your Rights in Regard to your Personal Data

6.1 Access

You have the right to request a copy of your personal data held by us. Our contact information appears at section 8 below.

6.2 Correction

Please contact us at any time if you would like to review, correct, or update personal data that you have previously disclosed to us. Our contact information appears at section 8 below.

6.3 Erasure and Restriction

You have the right to ask us to erase your personal data, or under some circumstances, to restrict us from processing your personal data. Our contact information appears at section 8 below.

6.4 Object

If you have any concerns about how we process your personal data, please contact us to discuss this. We may not be able to offer our services to you if you do not want us to process your personal data in the manner we consider it necessary to provide our services; nor provide a LAS report of your results. Our contact information appears at section 8 below.

6.4 Portability

You may have the right to request the personal data you have given to us in a machinereadable format, provided this would not infringe the rights, including intellectual property rights, of other people. Our contact information appears at section 8 below.

7. Retention Period

We will retain your personal and other data for the period necessary to fulfil the purposes outlined in this Privacy Policy and in line with our legal and regulatory obligations. In most cases this will be for five years from the time you complete the LAS so that you are able to access your LAS results during this time if needed.

8. Contact

If you have any questions about this Privacy Policy, please contact:

The General Manager, Maestro Communication

- In writing, at: PO Box 102, Killara, NSW, 2071, Australia; or
- By email, at LAS@mcspeaking.com.au

9. Complaints

Within Australia: If you are dissatisfied with our handling of any complaint you raise with us under this privacy policy, you have the right to contact the Office of the Australian Information Commissioner (<u>www.oaic.gov.au</u>).

Outside Australia: If you are dissatisfied with our handling of any complaint you raise with us under this privacy policy, you have a right to complain to the relevant independent supervisory authority in your jurisdiction.

10. Updates to this Privacy Policy and Notifications

We may update and change this Privacy Policy. The "Last Updated" legend at the top of this Privacy Policy indicates when this Privacy Policy was last revised.

We will contact you through the email address listed in your account with us to advise you of any material updates or revisions to our Privacy Policy, as well as any disclosures or alerts regarding the Privacy Policy or your personal data.

Electronic updates and disclosures and notices have the same meaning and effect as if we had provided you with a hard copy. Updates, disclosures and notices shall be considered to be received by you within 24 hours of the time they are sent to you by email.

11. Consent

By clicking the onscreen "I Agree" box and proceeding to undertake the LAS, you are agreeing to our Privacy Policy and giving explicit consent for us to collect and process

the personal data you enter in response to the LAS questions and create a LAS results report for you.

If you wish to withdraw your consent at any time while you are undertaking the LAS questions, simply discontinue answering. Unless you complete all the answers to the survey, your data will be deleted once the course group code for the survey expires. Until that time, you have the ability to complete the survey.

If you wish to withdraw your consent at any time after completing the LAS, please contact us immediately using the contact information in section 8 above. If you choose to withdraw consent after completing the LAS, your withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.