

Global Privacy Policy

1. Definitions

In this Privacy Policy:

Corporations Act means the Corporations Act 2001 (Cth).

CLG means Close the Loop Limited ACN 095 718 317.

CLG Group means CLG and each of its Related Bodies Corporate.

Personal Information has the meaning given to that term in the Privacy Act.

Privacy Act means the Privacy Act 1988 (Cth).

Privacy Officer means the privacy officer nominated by the Company.

Products means any and all of the products offered by the CtL Group.

Related Bodies Corporate has the meaning given to that term in the Corporations Act.

Services means any and all of the services offered by the CtL Group.

Website means www.ctlgroup.com.au and includes any and all subdomains.

Any reference to “CLG”, “we”, “us” and “our” includes a reference to CLG and each of its Related Bodies Corporate.

2. Purpose of this Privacy Policy

This Privacy Policy has been created because we value our customers and recognise their right to keep Personal Information private. CLG may collect Personal Information from you for the purposes of providing Products, Services and/or information to you. Any Personal Information collected from you will be used by us in accordance with, and as described in, this Privacy Policy. This Privacy Policy has been prepared by CLG. CLG operates the Website across desktop, mobile and tablet devices.

3. Collecting non-Personal Information

CLG may collect non-Personal Information on Website visits by users including, without limitation, which sections of the Website are most frequently visited, how often, and for how long. This data is always used as aggregated, non-Personal Information, and may be shared with CLG partners to provide them with information relating to how CLG visitors ‘use’ the Website. This is done for the purpose of providing you with the best and most efficient Services.

CLG's web servers may gather your IP address to assist with the diagnosis of problems or support issues with our Services, and to monitor the use of our Website, including the monitoring of the location of our users.

CLG may use cookies and applets to provide you with a better browsing experience. These cookies and applets may collect non-Personal Information such as preferences and click activity for measurement and for features. If you do not wish to have cookies active whilst you browse the Website you can “opt out” by modifying the privacy options in your browser.

In order to better understand our users, CLG may utilise third party measurement companies to assess Website and mobile Website traffic. This aggregated, non-Personal Information is collated and provided to CLG to assist in analysing the usage of the Website.

4. Collecting your Personal Information

CLG may ask you to supply Personal Information, such as your name, email address and/or phone number, for any of the following purposes:

- the provision of Products and/or Services by CLG to you;
- the provision of products and/or services by you to CLG;
- joining mailing lists regarding information relating to: CLG, the provision of Products and/or Services by CLG, and/or the industry in which CLG operates;
- joining mailing lists to receive investor information about CLG or the CLG Group;
- replying to any questions you may have about CLG, the provision of Products and/or Services by CLG and/or the industry in which CLG operates; and
- such other purpose as CLG thinks fit provided it is reasonable to collect Personal Information in those circumstances.

5. Disclosing your Personal Information

We may disclose your Personal Information if:

- you have consented to the disclosure;
- the purpose of the disclosure is consistent with the reason we collected your Personal Information;
- the disclosure is to a vendor, service provider, and/or technician who we engage to assist us to provide Products or Services to you (but only for that purpose);
- the disclosure is to a third party that offers and/or provides products and/or services complementary to our own but only for the purpose of enhancing our Customers' experiences by offering you complementary products and/or services;
- we sell or buy any business or assets, in which case we may disclose your Personal Information to the prospective seller or buyer of such business or assets;
- the disclosure is to a member of the CtL Group;
- the disclosure is required by law; or
- the disclosure is otherwise permissible under the Privacy Act.

6. Data Security

CLG takes security seriously and cares about the integrity of your Personal Information. We use commercially reasonable physical, administrative, and technological methods to transmit your data securely. However, CLG cannot guarantee that unauthorised third parties will never be able to defeat our security measures or use your Personal Information for improper purposes. In the event that any Personal Information under our control is compromised as a result of a breach of security, we will take reasonable steps to investigate the situation and where appropriate, notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.

7. International visitors and data transfers

The Website is not intended for use by residents of the European Union.

For the purposes of complying with law enforcement and national security requests, we may disclose Personal Information requests by public authorities in Australia and other jurisdictions.

8. Access and correction

You have the right to see the Personal Information we hold about you unless an exception applies. If you wish to do this, please contact us using the contact details set out below.

If your contact details or other Personal Information that we hold about you changes, please let us know as soon as you can. You can do this by using the contact details below.

9. Complaints

If you believe that your privacy has been breached, please contact the CtL Privacy Officer using the contact information below and provide details of the incident so that we can investigate it. We will treat your complaint confidentially, investigate your complaint and aim to ensure that your complaint is resolved within a reasonable time (and in any event within the time required by applicable law).

Privacy Officer Close the Loop Ltd 208 Hume Highway, Somerton Vic 3062 info@ctlgroup.com.au

If our response to your complaint does not address your concerns to your satisfaction, you have a right to refer the complaint to the Office of the Australian Information Commissioner.

10. Changes to Privacy Policy

Please note that this Privacy Policy may be amended from time to time. We will provide notice of any material changes on the Website, or otherwise via a direct electronic message to you.

This Privacy Policy was last updated on 6 October 2021.

A handwritten signature in black ink that reads "M Lichtenstein".

Marc Lichtenstein

Executive Director / CFO