



DriveSafe Diagnostics Privacy Policy

1 Document Version Control

Version	Date Released
V1.0-PRIVACY	November 28, 2023

2 Definitions and Notes

- **"Ts & Cs"** means these Terms and Conditions
- **"Product(s)"** means assessment instruments (including but not limited to software, websites, digital apps and reports) and related materials (including but not limited to software, administration and user reference materials, manipulatives, reports and services) published, supplied or made available by DriveSafe Diagnostics pursuant to these Ts & Cs.
- **"Service(s)"** means DriveSafe Diagnostics' websites, apps, digital products, and everything that powers them.
- **"Customer"** means the qualified and registered user of the Product(s) and Services(s) whose eligibility to use the Product(s) and Service(s) is determined by DriveSafe Diagnostics in its sole discretion, who are individually and collectively are referred to as "Customer."
- **"DriveSafe Diagnostics"** means DriveSafe Diagnostics Pty Ltd ABN 14667326472 ("DriveSafe Diagnostics" or "us") with registered office at 28 Cheviot Street, Ashbury, NSW 2193, Australia.

3 Aim of our Privacy Policy

DriveSafe Diagnostics Pty Ltd recognises the importance of privacy and are committed to protecting your privacy when handling your personal information. This Privacy Policy explains how we handle personal information in an open and transparent manner in accordance with the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) ("Privacy Act") and other applicable privacy laws. Personal information is information or an opinion about an identified individual or an individual who is reasonably identifiable.



This Privacy Policy will be reviewed from time to time to take account of new or amended laws, new technology and/or changes to our operations and practices and the changing business environment. All personal information held by us will be governed by the most recently updated policy.

This policy addresses the following:

- what information we collect;
- if you are minor (aged under 18 years);
- how we collect it;
- why we collect it;
- how we use it;
- how we disclose it;
- opting in and out;
- how we hold it - management and security; and
- accessing and updating or correcting your information and how to contact us.

4 What information we collect

The personal information we collect about you includes (but is not limited to) your name, contact details (including phone numbers and addresses), gender, date of birth, occupation, identification numbers and other information which may assist us in conducting our business, and providing and marketing our products and services.

In certain circumstances we manually collect financial information including your credit card information where appropriate or engage third-parties (e.g. Stripe) to collect this data online so that this information is not stored by DriveSafe Diagnostics and so that we can meet Payment Card Industry (PCI) Data Security Standard (DSS) compliance

We may also collect sensitive information from you (such as health information about you) only if you consent to our collection of such information and the information is reasonably necessary for one or more of our functions or activities (or we are otherwise permitted or required by law to do so), including:

- where such information is required in order for us to be able to provide our goods or services to you (including psychological testing materials or services to assess intelligence, memory, neurocognitive functioning, academic achievement, work aptitude and personality, learning and developmental delay, or speech and motor disabilities).
- where such information is relevant to any research project conducted by us, in which you participate or wish to participate.

We also collect information about you that is not personal information. For example, we may collect data relating to your activity on our websites (including the type of internet browser you use, your operating system, address of referring site, your IP address and other clickstream information) via tracking technologies such as cookies, or we may collect information from you in response to a survey, promotion or competition. We may use Google



Analytics, Google Search Console, Hotjar, and other analytics tools. We generally use this information to report statistics, analyse trends, administer our services, diagnose problems, advertise online, optimize our advertising and websites and target and improve the quality of our products and services.

Cookies allow your browser to utilise some of the features of our websites. We use both session ID cookies and persistent cookies, first party cookies (such as Google Analytics cookie) and third-party cookies together to inform, optimize, and serve ads based on someone's past visits to our website, to report how our ad impressions, other uses of ad services, and interactions with these ad impressions and ad services are related to visits to our site. Third-party vendors, including Google, may show our ads on sites across the Internet. Most web browsers are set by default to accept cookies. If you reject cookies you will be unable to take advantage of some of the features of our websites. To the extent this information does not constitute personal information, the Privacy Act is not applicable and we may use this information for any lawful purpose.

We generally advise that you do not publish or communicate personal information, or at least limit the personal information that you publish or communicate, to the public via our services, such as in any forums, blogs or anywhere that user generated content can be uploaded ("Non-Confidential Information"). We cannot control any third-party collection or use of your Non-Confidential Information that is publicly available.

5 Cookies

We use cookies to make our websites more user-friendly. Find out about the main types of cookies we use, and what we use them for.

5.1 What are cookies?

Cookies are small pieces of text which are downloaded to your device, for example, when you visit a website. Cookies are useful because they allow DriveSafe Diagnostics to understand our customers better so that we can provide a more focused user experience. Using the knowledge of your previous visits to our website, Pearson can enhance subsequent visits by tailoring our content to match your requirements. You can find more general information about cookies at: www.allaboutcookies.org.

When we mention "cookies", we also mean other technologies such as web beacons and pixels that collect information in a similar way to cookies on websites or emails. When we mention "websites", we also mean mobile applications and emails.

5.2 How do we use cookies?

We use cookies principally because we want to make our websites and mobile applications user-friendly, and we are interested in anonymous user behavior. Generally, our cookies don't store sensitive or personally identifiable information such as your name and address or credit card details.



In the unlikely event that our websites use cookies to store personal information about you, DriveSafe Diagnostics encrypts the personal data to prevent unauthorized use by anyone else.

DriveSafe Diagnostics uses two main categories of cookie: (1) strictly necessary cookies; and (2) optional cookies:

5.2.1 Strictly Necessary Cookies

These cookies are essential to enable you to use the features of our services and websites, such as technically delivering content, setting your privacy preferences, logging in, making payments or filling in forms. Without these cookies, our services cannot be provided so you cannot decline them.

5.2.2 Optional Cookies

Optional cookies consist of all the other cookies we use to enhance our products and services and deliver you the best user experience. These optional cookies fall into several categories which you can read more about below.

5.2.3 Performance cookies

These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and they let you store items in your shopping basket between visits. They may also show us which email or web page visitors clicked through from in order to visit our website, and whether you opened an email we sent you.

Some of these are analytics cookies, set using third party web analytics software, which allow us to monitor our website traffic. For example, we use Google Analytics and Universal Analytics cookies to help us do this. These analytics cookies may also tell us how many of our visitors are male or female, and may summarize the number of visitors who fall within certain age ranges, or certain interest categories. However, this sort of information is not linked to any individual; it just shows us what percentage of our visitors fall in particular categories.

[Find out more about how Google uses your data](#) or [opt out from having your data sent to Google](#).

We will not pass this data to third parties in such a way that would allow them to identify visitors personally. However, we may associate this cookie data with other personally identifiable data submitted by you (for instance when you submit a form, or partially complete a form, or leave items in your shopping basket), in order to make sure that our communications are as relevant to you as possible.

Sometimes we may use this data to highlight Pearson products or services which we think will be of interest to you based on your use of our websites, or to contact you and offer help if you appear to be having difficulty completing an order.

We may also use third party cookies during e-commerce transactions to help prevent fraud.



5.2.4 Functionality cookies

These cookies allow the website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. For instance, these cookies can be used to remember changes you have made to text size, fonts and other parts of web pages that you can customize.

They may also be used to provide services you have asked for such as watching a video or commenting on a blog. The information these cookies collect may be anonymized and they cannot track your browsing activity on other websites.

5.2.5 Behaviorally targeted advertising cookies

We use these cookies to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as to help measure the effectiveness of the advertising campaign.

These cookies remember that you have visited our website and use this information to tailor advertising for our products and services when you visit third party websites.

The cookies are placed by advertising networks. In line with Internet Advertising Bureau guidelines, our online advertising served via this method includes the AdChoices icon. Clicking on that icon will give more information about tracking cookies and allow you to opt out of receiving further targeted advertising. For more information, and how to opt out of these cookies, head over to [AdChoices](#).

5.2.6 Third-party cookies and social networks

If you click on a hyperlink from DriveSafe Diagnostics' websites to any third-party websites (for example, if you purchase online credits you will be directed to a Stripe-managed payment page), you may be sent cookies from these third-party websites.

Third-party websites will have their own privacy and cookie policies which DriveSafe Diagnostics cannot control. Please check the third-party websites for more information about their cookies and how to manage them.

6 If you are a minor (aged under 18 years)

We provide subscription services to, and may conduct research projects involving, children and young adults who are legally minors and may not be able to provide valid consent to our collection, use, disclosure, storage or other handling of their personal information. From time to time we may also conduct competitions and provide other services for children/minors who may or may not be subscribers to our online services or newsletters.

Parents and guardians of children/minors are personally responsible for monitoring their child's/minor's access to, and use of, our services and for providing valid approvals for their child's/minor's participation in subscription, research projects, competition and other promotional activities conducted by us.

If you are a child or young adult under the age of 18 years, you must ask your parent or legal guardian to approve your provision of personal information before you submit your personal details to us.



7 How we collect it

We may collect your personal information from a variety of sources, including from you, advertisers, mailing lists, recruitment agencies, contractors and business partners.

We will generally collect personal information by way of forms filled out by people, face-to-face meetings, interviews, business cards, electronic communications, telephone conversations and from third parties (including representatives, agents and credit reporting agencies). In addition, we collect personal information from our websites through receiving subscription applications, job applications, applications to participate in our research projects, applications to join our mailing lists, competition applications and other electronic documents.

We may collect your personal information when you request, acquire or use a product or service from us, register with us as a subscriber, member, administrator or user, provide a product or service to us, complete a survey, consent form or questionnaire, complete assessment materials as part of our research projects in which you participate, enter a competition or event, contribute in a fundraising event, participate in our services (including blogs and forums) or our research projects or when you communicate with us electronically (including email and facsimile), by telephone or in writing (for example if you make a complaint or provide feedback) or where you provide personal information via social media (such as via Facebook, Twitter, Instagram, YouTube, and LinkedIn).

If, at any time, you provide personal or other information about someone other than yourself, you must have that person's consent to provide such information for the purpose for which you provide it to us.

8 Transmission of information

Data collected and received by us in connection with the delivery of assessments may be transmitted to and or stored in countries other than Australia. The Internet is a global environment. By using this system and sending information to us electronically, you consent to transborder and international transmission of any Personal Data collected or processed through this system.

8.1 Why we collect it

The primary purpose for which we collect information about you is to conduct our business, provide and market our products and services to you, meet our legal or regulatory obligations, and also for the management of business transactions entered into with us and the administration of any accounts you have with us, and for the purposes of our research projects in which you participate or wish to participate (including data analysis purposes under our research projects and assessment of your eligibility to participate in our research projects). We may state a more specific purpose at the point we collect your information (including but not limited to any law that requires or authorises the particular information to be collected).

If you do not provide us with all or some of the information that we request, we may not be able to provide you with our products or services or include you as a participant in our research projects. For example, if you do not register as a member of a website, you will not be able to access features or services that are reserved for members or subscribers only.



8.2 How we use it

In addition to the primary purpose outlined above, we may use the personal information we collect, and you consent to us using your personal information:

- to provide you with news and information about our products and services, and opportunities that we believe you may be interested in;
- for purposes necessary or incidental to the provision of products or services to you;
- to personalise and customise your experience purchasing or using our products or services;
- to manage and enhance our products and services;
- to communicate with you, including by email, mail, telephone or via social media;
- to conduct competitions or promotions;
- to verify your identity;
- to investigate any complaints about or made by you, or if we have reason to suspect that you are in breach of any of our terms and conditions or that you are or have been otherwise engaged in any unlawful activity;
- as part of any investigation in relation to you or your activity which we suspect to be a breach of any of our terms and conditions, serious misconduct or unlawful;
- as part of a sale (or proposed sale) of all or part of our business; and/or
- as required or permitted by any law or regulation (including without limitation the Privacy Act).

8.3 How we disclose it

We may disclose personal information, and you consent to us disclosing your personal information, to third parties:

- engaged by us to perform functions or provide products and services on our behalf, such as processing of credit card information, mailouts, debt collection, marketing, research, advertising and hosting of customer relationship management (CRM) systems. Such third parties include Google Analytics, Google Drive, GMAIL, Stripe, Zoom, and Squarespace;
- engaged by us as contractors (for example, software developers, project managers)
- engaged by us as contractors to assist with our research projects in which you participate or wish to participate;
- that are our agents, business partners or joint venture entities or partners;
- that sponsor or promote any competition that we conduct or promote via our services;
- authorised by you to receive information held by us;
- as part of any investigation in relation to you or your activity which we suspect to be a breach of any of our terms and conditions, serious misconduct or unlawful (including disclosure to the police, any relevant authority or enforcement body, or your Internet Service Provider or network administrator);
- that are our external advisers or potential or actual bidders or their external advisers as part of a sale (or proposed sale) of all or part of our business; and/or
- as required or permitted by any law or regulation (including the Privacy Act).



8.4 Opting in or out

At the point we collect information from you, you may be asked to "opt in" to consent to us using or disclosing your personal information for purposes other than those that are expressly stated in this Privacy Policy. For example, you may be asked to opt-in to receive further information or communications from our advertisers or supporters.

You will be given the opportunity to "opt out" from receiving communications from us or from third parties that send communications to you in accordance with the Privacy Act and other applicable privacy laws. For example, you will be given the option to unsubscribe to emails or newsletters sent by us.

You may also opt-out of Google Analytics and customise your Google Display Network ads by using the Ads Settings. You can also access Google Analytics' currently available opt-outs for the web.

To opt-out, please use opt-out links in any email you receive from us and/or email info@drivesafediagnosics.com

8.5 How we hold it - management and security

Our executive oversees the management of personal information in accordance with this Privacy Policy, the Privacy Act and other applicable privacy laws.

Other than in relation to Non-Confidential Information, we will take all reasonable steps to protect the personal information that we hold from misuse, interference, and loss, and from unauthorised access, modification or disclosure including by means of secure premises, locked cabinets, firewalls, password access, secure servers and encryption of credit card transactions.

Our digital products and apps collect, and store all collected information in a central, Cloud-based database owned by DriveSafe Diagnostics Pty Ltd and managed by our contracted developers, system administrators and penetration testers. To secure this data, we:

- contract our Cloud environment to [Amazon Web Services \(AWS\)](#) - an established and global hosting provider
- encrypt all collect data in transit and at rest
- use well-known technologies as part of our software architecture
- observe all core architecture mandatory security vulnerability announcements and apply patches as advised
- limit logged in access to applications and data stores to only DriveSafe Diagnostics employees and contractors who require access to perform their role or contract
- enforce strong password policies



However, you acknowledge that the security of online transactions and the security of communications sent by electronic means or by post cannot be guaranteed. You provide information to us via the internet or by post at your own risk. We cannot accept responsibility for misuse, interference or loss, or unauthorised access, modification or disclosure in respect of your personal information where the security of the information is not within our control.

If you suspect any misuse, interference or loss, or unauthorised access, modification, or disclosure in respect of your personal information, or any other privacy breach please let us know immediately.

8.6 Accessing and updating or correcting your information and how to submit a complaint.

Subject to the exceptions set out in the Privacy Act and other applicable privacy laws, you may request to access, update or correct the personal information we hold about you. We will require you to verify your identity and to specify the information that you wish to access, update or correct. A fee may be charged for providing access however we will advise you of the likely cost in advance. Eligible customers who have registered for online access to our Products and Services will generally be able to access, update and correct their membership and contact details online.

We request that you keep your information as current as possible so that we may continue to improve our service to you.

If you wish to access, update or correct any personal information that we hold about you, or if you have any questions or would like to submit a complaint about how we collect, use, disclose, store or otherwise handle your personal information, you can contact the department that collected your personal information in the first instance, or write to our Privacy Officer at the contact details below. We will acknowledge your complaint promptly and use our best endeavours to work with you to resolve your complaint.

Privacy Management
DriveSafe Diagnostics Pty Ltd
28 Cheviot Street
Ashbury NSW 2193
Email: info@drivesafediagnosics.com

9 Related Policies

9.1 DriveSafe Diagnostics – Terms and Conditions

A current copy can be found at <https://drivesafediagnosics.com/s/Terms-and-Conditions-CURRENT.pdf> and may be changed at any time at DriveSafe Diagnostics' discretion.



9.2 DriveSafe Diagnostics – Acceptable Use Policy

A current copy can be found at <https://drivesafediagnosics.com/s/Acceptable-Use-CURRENT.pdf> and may be changed at any time at DriveSafe Diagnostics' discretion.