Attivo Group Privacy Policy

Your privacy is important to Attivo Group Holdings Pty Ltd (Entities that sit under AGH, 303 Group Pty Limited, Tonic PR Pty Limited, Mediahub & Rhubarb Lane) (referred to in this Privacy Notice as one of the previously named agencies, Attivo, we, our or us).

This Privacy Notice explains how we may collect, use and disclose the personal information that we collect from you or which we have obtained from a third party. This Privacy Notice also sets out various rights that you have in relation to that personal information. Please take a moment to read and understand it.

We may modify or amend this Privacy Notice from time to time. The current version is available on our website or on request.

When does this privacy notice apply?

This Privacy Notice applies to our Australian operations. We may collect your personal information from you or a third party by the following means:

- when you visit or use one of our consumer and customer-directed websites, applications or social media channels;
- when you purchase and use our products, services, web-based tools, systems or applications (including mobile applications);
- when you subscribe to our newsletters;
- when you provide us with information relating to your goods or services;
- when you contact our customer support;
- when you join our business events;
- when you participate in our competitions, promotions and surveys; and
- when you otherwise interact with us (directly or indirectly) in your capacity as consumer, business customer, partner, supplier, contractor or other person with a business relationship with us.

What types of information do we collect about you?

The type of information we collect from you will depend on who you are (e.g. customer, consumer, supplier, business partner, etc.), how you interact with us (e.g. online, offline, over the phone, etc.) and why you are interacting with us (but by way of example, may include your name, date of birth and contact details). We collect information you give us (including information that we may collect automatically) or information that others provide to us.

Directly below is an overview of the categories of personal information that we may collect:

Information you provide to us directly:

Categories of information	Examples of types of information
Personal identification information	Name, title, date of birth
Contact information	Email, phone number, address, country of residence
Financial information	Bank account information
Any other information that you decide to voluntarily share with your respective Attivo Agency.	Feedback, opinions, reviews, comments, uploaded files, interests, information provided for our due diligence process

Information we may collect automatically:

When you visit or use our websites or applications, subscribe to our newsletters or otherwise interact with us through our digital channels, in addition to the information you provide to us directly, we may collect information sent to us by your computer, mobile phone or other access device.

For example, we may collect:

Categories of data	Examples of types of data
Device information	Device make and model
Log information	Internet browser, time and date
Location information	IP address location
Other information about your use of our digital channels or products	Links you click within our advertising emails

We may use third-party tools (such as Google Analytics), to record statistical and demographic information about website visitors, including location, browser details, behavioural and interaction information (including referral URLs and search terms), and computer and network information. Depending on what is collected and how it is combined, this may be personal information.

For more information on how Google Analytics collects and processes information, please see here: https://policies.google.com/technologies/partner-sites (or any other URL Google may provide from time to time) for Google's Privacy and Terms, and see here: https://support.google.com/analytics/answer/6004245 (or any other URL Google may provide from time to time) for information on safeguarding your data.

Google also provides instructions on how to opt-out of having information collected by Google Analytics: https://support.google.com/analytics/answer/181881.

We may also use cookies and similar technologies to enhance our users' experiences on our website as well as third party cookies (for example, Facebook or Google) to help us improve our advertising. Cookies can be turned off in users' web browser settings.

Information we may collect from other sources:

To the extent permitted by applicable law, in addition to our websites, applications and other digital channels, we may also obtain information about you from other sources, such as public databases, clients, joint marketing partners, social media platforms and other third parties.

How we may use your data

Purpose	Example
Assessment and screening of customers, suppliers and/or business partners	Conducting due diligence
Conclusion and execution of agreements	Sales, billing, shipment of products or services, registration to mobile applications or websites, warranty, service communications, account management
Providing support (upon your request)	Providing support via communication channels, such as customer support

Purpose	Example
Marketing & Advertising	Promoting contact with consumers and/or business customers, email and/or electronic marketing, market surveys, personalising your experience by presenting products and offers tailored to your preference, interests or profile (such as on our sites, applications or in other communication channels). Tailored & personalised advertising across the web including, but not limited to Facebook & Google. Email marketing communications (which you can opt out of at any time).
Security and protection of our interests/assets	Deploying and maintaining technical and organisational security measures, conducting internal audits and investigations, conducting assessments to verify conflict of interests
Compliance with legal obligations	Disclosing data to government institutions or supervisory authorities as applicable such as responding to legal process and managing any internal complaints or claims
Product development	To improve the services, products, online services, mobile applications and communications we provide towards you or others

We may use email addresses we have collected to create or match audiences for advertising on platforms such as Facebook and Google, where this is consistent with the purpose for which the information was collected and applicable privacy and marketing laws.

Direct marketing and opting out

You can manage personalised advertising through the relevant platform's advertising settings:

- **Facebook:** https://www.facebook.com/adpreferences/
- **Google:** https://myadcenter.google.com/

You can ask us to stop sending you direct marketing communications at any time by contacting us using the details below or by using the unsubscribe instructions in the relevant communication.

How we disclose your personal information

We may disclose information about you:

- to our service providers (including our hosting providers, payment providers and shipping providers);
- to other third parties to the extent reasonably required to carry out the purposes for which we may use your personal information (as outlined above under "How we may use your data");
- where required or authorised by law, including in connection with legal proceedings or investigations; or
- with your authorisation, or as otherwise permitted by law.

Overseas disclosure

Some service providers used for website analytics and advertising may process limited personal information outside Australia, including in the United States. This may include online identifiers, device and browser information, website interactions and, where audience-matching services are used, email addresses or transformed versions of email addresses. Where Australian Privacy Principle 8 applies, we will take the steps required by law in relation to the overseas disclosure.

Protecting your personal information

Attivo has security measures in place, and takes reasonable steps, to keep your information safe from loss, unauthorised access, use, modification or disclosure, and other misuse. Attivo may utilise services from one or more third party suppliers to monitor or maintain the cyber security of its systems and information.

We hold personal information electronically in our systems and with service providers, and in paper records where required. Our main email and document storage is hosted in Australia. When information is no longer needed for a purpose permitted by law, we take reasonable steps to destroy or de-identify it unless we are legally required to keep it.

Accessing and correcting your personal information

You can always contact us using the contact details set out below if you would like to:

- request confirmation that we hold personal information about you;
- access, review, correct or request deletion of personal information we hold about you (to the extent Attivo is not otherwise permitted or required to keep such information);
- provide us with a statement of the correction sought to your information that you are seeking to be made (Statement of Correction) and request us to attach that Statement of Correction to your information if we do not make the correction sought;
- object to certain information processing operations (e.g., opt-out from marketing communications);
- receive a copy of your information. We do not charge for making an access request or correcting information. A reasonable fee may apply to providing access, but it will not be excessive, and we will tell you about it first;
- ask us any other questions related to the protection of your information.

We may need to verify your identity before responding. We respond to access and correction requests within a reasonable period. If we refuse a request, we will explain why in writing where required by law and tell you how to complain.

Breach notification

Under the Notifiable Data Breaches scheme in the Privacy Act 1988 (Cth), Attivo must notify the Office of the Australian Information Commissioner (OAIC) and individuals at risk of serious harm where Attivo has reasonable grounds to believe that an eligible data breach has occurred. Attivo will make any required notifications as soon as practicable and take reasonable steps to contain and respond to the breach and reduce the risk of harm.

More information about the Notifiable Data Breaches scheme is available on the OAIC website.

Privacy complaints

If you have a complaint about how we have handled your personal information, please contact us using the details below. We will investigate your complaint and respond within a reasonable period. If you are not satisfied with our response, you may complain to the Office of the Australian Information Commissioner at https://www.oaic.gov.au.

Contact us

If you have any queries about this privacy notice or personal information we have collected about you, please contact 303 Group Pty Limited – Sydney Office.

Postal Address: L2, 33 Playfair Street, The Rocks, NSW, 2000

Contact Number: +61 2 9552 2100

Last Updated: 18th of November 2026