

Privacy Policy

Last modified: 16 August 2019

Introduction

Spinning Your Web Pty Ltd ("SYW.io") values your privacy. This Privacy Policy informs you of your choices and our practices regarding any Information you provide to us. The use of our services may involve the collection and use of your Information (as defined in the "The Information We Collect and How We Collect It" section below) on our services (including our websites and mobile applications).

It is important for you to understand how this happens and how you may control it, so please read this Privacy Policy carefully. By using our services, you agree that we may collect, use and share your Information in accordance with this Privacy Policy, as revised from time to time.

If you wish to contact us regarding this Privacy Policy or any privacy-related matters, please contact us via email at support@syw.io.

Scope

This Privacy Policy is incorporated into and form part of the Terms of Service that you have agreed to in order to use our services. Any terms used in this Privacy Policy will have the same meaning as the equivalent defined terms in the Terms of Service , unless otherwise defined in this Privacy Policy or the context requires otherwise.

Please also note that this Privacy Policy does not apply to Information collected: (i) through third party services (including any third party websites) that you may access through our services; or (ii) by other companies and organisations who advertise their services on our services.

Changes

We may from time to time revise or add specific instructions, policies and terms to this Privacy Policy. These instructions, policies and terms form part of this Privacy Policy.

Where we consider that any changes to this Privacy Policy are reasonably material, we will notify you (via our website at www.syw.io, direct communication to you, or other means) prior to the change becoming effective.



By continuing to use our services after any changes to this Privacy Policy, with or without notice from us, you are agreeing to the revised Privacy Policy.

The Information We Collect and How We Collect It

In providing our services, we collect, store and use the following Information relating to you:

"Information" is Personal Information and Non-Personal Information;

"Personal Information" is any information or combination of information that relates to you, and can be used to identify you.

Personal Information may include the following:

- information you make available to us when you open an account or use our services, such as your name, telephone number and email address.
- information which you make available to our services as you use them, including Shared Information you make available to others through our services and information you store using our services;
- Shared Information that you or others using our services make available about you, such as information contained in reports and communications; and
- information we collect as you use our services, such as certain Location Data, Log Data and public information.

"Location Data" is information that we collect regarding your location (when you use a location-enabled service), including:

- the location of your device when you use our services, such as from the GPS, WiFi, compass, accelerometer or other sensors in your device;
- the IP address of the device or internet service you use to access our services,
- other information made available by you or others that gives an indication as to where you are or have been located, such as account information that indicates where you are located and Shared Information you or others post indicating your location, such as any geotag information that is embedded in any photos you make available to us; and
- if you have provided us with your location data previously and would like us to delete such existing location data, you may be able to do so via our services.



"Log Data" is technical information that is automatically collected by us when you use our services, whether through the use of cookies or otherwise, including:

- technical information such as your mobile carrier, configuration information made available by your web browser or other programs you use to access our services, your IP address and your device's version and identification number,
- information about communications you have made using our services, such as the people you've communicated with and the time, data and duration of your communications; and
- metadata, which means information related to items you have made available through our services, such as the date, time or location that a shared photograph or video was taken or posted.

"Non-Personal Information" is any information that relates to you but from which it is not practicable to directly or indirectly identify you, including Personal Information in aggregated, anonymised or pseudonymised form.

"Shared Information" is information about you or relating to you that is voluntarily shared on our services, including reports generated including Location Data and Log Data associated with these reports. Shared Information also includes information about you (including Location Data and Log Data) that others who are using our services share about or with you.

How We Use Your Information

We may use your Information for any of the following purposes:

- to provide our services to you;
- for customer service, security, fraud-detection, archival and backup purposes in connection with the provision of our services;
- to better understand how you access and use our services, for the purposes of trying to improve our services and to respond to customer desires and preferences, including language and location customisation, personalised help and instructions, or other responses to your and other customers' usage of our services;
- to help us develop our new services and improve our existing services;
- to assess the effectiveness of and improve advertising and other marketing and promotional activities on or in connection with our services;
- for the purposes of software verification or administering software upgrades; and
- to allow you to participate in surveys and other activities about our products and services.



Please note that for the purposes of seeking to provide our users with a better experience, to improve our services or otherwise where you have consented, Personal Information collected through one of our services may, subject to user privacy controls (where available), be used by our other services (including in an aggregated or individualised manner).

If any of your Personal Information comprises Your Content (as defined in the Terms of Service), we and our affiliate companies may (subject to this Privacy Policy) use such Personal Information in accordance with the "Your Content" section of the Terms of Service.

As noted under the "Use of your device by our services" section in the Terms of Service, we may require access to or use of your Personal Information within your device in order to provide our services to you. Any Personal Information that we use or access within your device will be treated in accordance with this Privacy Policy and the Terms of Service.

Other than as permitted under this Privacy Policy or as otherwise consented to by you, we will not transfer your Personal Information to any other third parties for their processing for any purposes.

We and our affiliate companies may share your Personal Information within our group of companies and with joint venture partners and third party service providers, contractors and agents (such as communication service providers who send emails or push notifications on our behalf, mapping services providers who assists us and you with location data, analytics partners who assist our business, and advertising partners on our services).

In addition, we may allow such third parties to collect your Personal Information across our services. In each case, we permit such sharing and/or collection for the purposes of: (i) providing our services to you; (ii) assisting us in carrying out the purposes set out under the "How We Use Your Information" section above; (iii) carrying out our obligations and enforcing our rights under the Terms of Service or this Privacy Policy; and/or (iv) our business, including helping us better understand and improve our services. These third parties may be located, and use and store your Personal Information, outside of your jurisdiction for these purposes.

Where we permit any third parties to collect and use your Personal Information in accordance with the above paragraph, we will use reasonable efforts to ensure that such third parties only use your Personal Information: (i) in compliance with this Privacy Policy; and (ii) subject to any other instructions we give them, including any appropriate confidentiality and security measures that we implement.



You consent to the third party use, sharing and transfer of your Personal Information (both inside and outside of your jurisdiction) as described in this "Sharing of your Personal Information" section.

As we continue to develop our business, we or our affiliate companies may be acquired by a third party or re-organise our group structure. In these circumstances, it may be the case that your Information is transferred within our group and/or transferred to a third party who will continue to operate our services or similar services under either this Privacy Policy or a different privacy policy which will be notified to you. The party to which your Personal Information is transferred may be located, and use your Information, outside of your jurisdiction.

You agree that we or our affiliate companies may be required to retain, preserve or disclose your Personal Information: (i) in order to comply with applicable laws or regulations; (ii) in order to comply with a court order, subpoena or other legal process; (iii) in response to a request by a government authority, law enforcement agency or similar body (whether situated in your jurisdiction or elsewhere); or (iv) where we believe it is reasonably necessary to comply with applicable laws or regulations.

You also agree that we or our affiliate companies may need to disclose your Personal Information in order to enforce the Terms of Service or this Privacy Policy, protect our rights, property or safety, or the rights, property or safety of our affiliate companies or other users of our services.

Communications from Us

Push Notifications

When you use our services, we may use your Information to send you emails or push notifications to your device. If you no longer wish to receive these communications, you can do so by opting out of notifications at the device level (if available) or contacting us.

Service Announcements

We may from time to time send you service-related announcements when we consider it necessary to do so (such as when we temporarily suspend one of our services for maintenance). You may not opt-out of these service-related announcements, which are not promotional in nature.



You consent to all processing of sensitive Personal Information for the purposes and in the manner described in this Privacy Policy.

Please note that we do not use your sensitive Personal Information for the purpose of serving advertising to you.

Age Restrictions

If you are under the age of 18, you must not use our services.

Transfer, Storage and the Security of Your Personal Information

We operate and may continue to operate servers in a number of jurisdictions around the world, so the server on which your Personal Information is used and stored may not be in your jurisdiction.

You consent to the transfer of your Personal Information (both inside and outside of your jurisdiction) for the purposes described in this Privacy Policy. We use a variety of security technologies and procedures for the purpose of preventing loss, misuse, unauthorised access or disclosure of Information.

In some of our services, we will use encryption technology (such as SSL) to protect certain sensitive Information provided by you to us. Please be aware that despite our efforts, no data security measures can guarantee 100% security at all times.

Our systems and the communications networks through which you access our services may be subject to security breaches and failures which are due to circumstances beyond our reasonable control.

Retention of Personal Information

Subject to applicable laws and regulations (including as set out under the "Sharing of your Personal Information" section above), we will only retain your Personal Information for so long as is necessary to fulfill the purposes as set out under the "How We Use Your Information" section above.

Subject to applicable laws and regulations, you may have the right to request to receive a copy of and make any corrections to your Personal Information which we hold, or to request that we delete any of your Personal Information that is stored by us.



You may direct such request to our email support@syw.io. We will respond to all requests made to this email under this "Retention of your Personal Information" section within 90 days.

In addition, within some of our services, we may offer you options to amend or delete, and/or change how we and the public can view and/or access, your Personal Information and/or Shared Information within those services - in which case, please log into your account with us within the relevant service and make the appropriate changes.

Should your account be terminated by you or us for any reason, we will (subject to the above paragraph) take steps to ensure that your Personal Information is no longer available through our services, or otherwise used by us, within a reasonable period of time (subject to technical limitations) after such account termination.

However, it is important to note that communications made by you using our services may put your Personal Information in the hands of third parties that we cannot control - for example, if you have previously made your Personal Information public via our services. In some instances, we may not be able to delete your Personal Information and/or Shared Information from our services or systems - in which case we will (where reasonably practicable) let you know why we are unable to do so.

