



## NORTHBRIDGE PRIVACY POLICY

Customers are Northbridge's most valuable asset. We recognize that building a long-term business relationship with you depends a great deal on trust. This trust begins with our commitment to respecting and protecting your privacy. This Privacy Statement provides a clear and prominent explanation of how we collect, use, share and protect your personal data.

### This Privacy Statement covers the following subjects:

- Types of Personal Data We Collect
- How We Collect Personal Data
- How We Use the Personal Data We Collect
- How We Share Your Personal Data
- How We Store, Process and Protect Your Personal Data
- Your Choices About Your Personal Data
- Additional Information
- Changes to Our Privacy Statement
- How to Contact Us

These areas are described in detail below. This Privacy Statement does not apply to the practices of third parties that we do not own or control, including but not limited to any third-party websites, services and applications that you elect to access through our websites.

### 1. Types of Personal Data We Collect

Personal data is any information relating to an identified or identifiable natural person, including information that can be used to identify you as an individual, directly or indirectly by reference to one or more factors specific to you. Personal data can include the following types of information:

**Personal information:** Northbridge collects and uses personal information from our customers and potential customers. Such information may include your name, contact information (postal address, telephone number, fax number, and email address), billing information or other financial information. You may also elect to provide Northbridge with information regarding your personal or professional interests, demographics, experience and contact preferences.

**Online usage information:** Northbridge also sometimes collects and uses information from your online interactions with us. Online usage information can include IP address, referring/exit pages and URLs, number of visits to our website and the hyperlinks you visited.

We may combine the information you provide to us through different communications and contact channels, for example by combining data collected online with information provided offline.

## 2. How We Collect Personal Data

Northbridge collects personal information in several ways. We collect personal information that you choose to provide Northbridge through our website, on the phone or electronically. Additionally, we may now or in the future receive personal information about you from third parties that legally acquired the information and that have the right to share it with Northbridge. For example, we may receive contact information through an email list vendor, or a supplier that works with us for payroll may ask for your personal data on our behalf.

## 3. How We Use the Personal Data We Collect

**Use of personal information:** Northbridge uses your personal information: (a) to respond to your correspondence; (b) to help you complete a transaction or service; (c) to provide updates on service and benefits; (d) to personalize our website for your needs; (e) to provide advertising, promotions or newsletters regarding Northbridge services to you online or by email; (f) to conduct market research to help us better meet our customers' needs; (g) to obtain your feedback on Northbridge services; (h) to process job applications; and (i) for payment and processing. Whenever we collect financial data, such information will be encrypted, will only be used for payment processing and will not be retained for other purposes.

**Use of online usage information:** Northbridge collects online usage information to optimize your online experience, specifically: (a) to remember information so that you will not have to re-enter it during your visit or the next time you visit the site; (b) to provide custom, personalized content and information; (c) to provide and monitor the effectiveness of our website; (d) to monitor aggregate metrics such as total number of visitors, traffic, and demographic patterns; (e) to diagnose or fix technology problems; (f) to provide advertising for Northbridge services to you online or by email.

**Use of combined personal data:** Northbridge may sometimes combine your personal information with online usage information to build a broader profile of our individual users so that we can better serve our customers. This combined data will be used only for the purposes outlined in this Privacy Statement.

**Online advertising:** We partner with trusted third parties to manage Northbridge advertising on other websites. These partners use cookies to collect information about your activities on Northbridge's website so that we can provide you advertising for Northbridge products and services that are relevant to your interests.

## 4. How We Share Your Personal Data

**Personal information:** Northbridge will not rent or sell your personal information to third parties. We will only share your personal information outside of Northbridge for the reasons described below:

**Northbridge business partners:** We may share your personal information with Northbridge business partners including sales, solution partners and agents offering Northbridge products and services, and vendors acting at our direction. We do so only to the extent necessary for the specific business partnership, or as otherwise permitted by applicable law. Such Northbridge business partners are

required to keep this information confidential and may not use it for any purpose other than to offer, sell or rent Northbridge services, or to provide services at Northbridge's direction.

**Corporate transactions:** Circumstances may arise where Northbridge decides to sell, buy, merge or otherwise reorganize. Such a transaction may involve the disclosure of personal information to prospective or actual purchasers, or the receipt of such information from sellers. It is Northbridge's practice to disclose personal information in these circumstances only as permitted by applicable data protection law and to seek appropriate protection for personal information in these types of corporate transactions.

**Legal necessity:** Northbridge also may disclose your personal information: (a) if we are required to do so by law; (b) if we believe that it is necessary to enforce or apply our terms of use and other agreements or otherwise protect and defend the rights, property or safety of Northbridge or that of our customers; or (c) to comply with a judicial proceeding, bankruptcy proceeding, court order or other legal obligation or government inquiry

**Your consent:** Northbridge also may disclose your personal information to any other third party with your prior consent.

**Online usage information:** We may share online usage information: (a) in any manner permitted for personal information, and (b) with vendors or service providers for the purposes described in the section above on "How We Use the Personal Data We Collect." We may also aggregate or otherwise strip data of all personally identifying characteristics and may share that aggregated, anonymized data with third parties. Any aggregated information shared in these contexts will not contain your personal information.

**User content:** Northbridge provides some opportunities for you to generate your own internet-based content about Northbridge and our services. Typically, the personal information that you provide in this user content will be shared outside of Northbridge as described below.

**User-generated comments:** Northbridge's website may contain areas where users can transmit or post communications, for example, on blogs or in user forums. Any personal information you submit there will be publicly available, and can be read, collected or used by other users, and could be used to send you unsolicited messages. We are not responsible for the personal information you choose to submit in such public areas.

**Social media widgets:** Northbridge's website may include social media features, such as the Facebook Like button. These features may collect online usage information through cookies or web beacons. Social media features and widgets are either hosted by a third party or hosted directly on our website. Your interactions with these features are governed by the privacy statement of the social media company providing them.

**Testimonials:** Northbridge sometimes posts on our website customer testimonials that may contain personal information. We obtain our customers' consent to post their name or other personal information along with their testimonial prior to posting the testimonial on our website. If you wish to update or delete your testimonial, please contact Northbridge.

## 5. How We Protect Your Personal Data

Northbridge is committed to ensuring the security and accuracy of your personal data.

**Security:** Northbridge puts in place appropriate physical, electronic and organizational measures to safeguard and secure your data. These measures follow generally accepted industry standards both during transmission and once it is received. Unfortunately, the transmission of information over the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmission to our website.

**Accuracy:** Northbridge strives to keep your personal data accurate. We will provide you access to your personal data and the ability to review and correct it or ask for it to be deleted, as applicable. To request access, correction or deletion of your personal data, please contact Northbridge. We will respond to your request as soon as is reasonably practicable and in any event within 30 days. In some instances, we may not be able to delete your personal data, in which case we will let you know if we are unable to do so and why. To protect your privacy and security, we will also take reasonable steps to verify your identity before granting you access or enabling you to make corrections.

**Data compromise:** In the event that the security of any of your personal data under our control is compromised as a result of a breach of security, Northbridge will take all reasonable steps to investigate the situation, when appropriate will notify those individuals whose personal data may have been compromised and may take other steps in accordance with any applicable laws and regulations.

**Data Retention:** We will retain your information for as long as your account is active or as needed to provide services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## 6. Your Choices About Your Personal Data

**Opting out of a collection of personal information:** You may, of course, decline to submit any personal information to Northbridge, but then you may not be able to take advantage of some features of our website and we may not be able to communicate with you about Northbridge services.

**Opting out of a collection of online usage information:** Your browser or mobile device may allow you to delete and disable cookies.

**Opting out of Northbridge emails:** You may choose to opt out of receiving marketing emails from Northbridge, including newsletters and promotions by following the unsubscribe instructions included in each marketing email or by contacting Northbridge. However, please note that opting out may prevent you from receiving email messages regarding updates or offers. If you opt out of marketing emails, we may continue to send you transaction or service-related emails about our business dealings with you to the extent required to establish, carry out or terminate such business dealings. We reserve the right to contact you for non-promotional purposes when we believe it is necessary, including where required by law.

**Deletion of user content:** To request that Northbridge remove your user content or personal information from public areas of our website, contact Northbridge. In some instances, we may not be able to remove your user content or personal information, in which case we will let you know if we are unable to do so and why. In addition, such information may continue to be available online even after it is removed from our website.

## 7. Additional Information

**Other websites:** We are not responsible for the practices employed by websites or services linked to or from Northbridge's website including the information or content contained therein. Please remember that when you use a link to go outside Northbridge's website, our Privacy Statement does not apply to third-party websites or services. Northbridge is not responsible for and does not control any third parties that you authorize to access your user content. If you are using a third-party website or service (like Facebook) and you allow such a third-party access to your user content, you do so at your own risk.

## 8. Changes to Our Privacy Statement

This Privacy Statement is effective as of the date stated at the start of this Privacy Statement. We reserve the right to modify this Privacy Statement at any time by posting the revised statement on our website and updating the date the statement was last revised. If we make material changes to our privacy practices, we will notify you by email or by means of a prominent notice on our homepage

## 9. How to Contact Us

Please contact Northbridge's Privacy Advocate with questions or comments about our privacy practices at:

[admin@northbridge.com.au](mailto:admin@northbridge.com.au)

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