

Personal Information We Collect

We may collect the following categories and types of “Personal Information”:

- **Contact information:** your first and last name, alias or username, mailing address, email address, and phone number;
- **Other identifying information:** internet protocol (IP) address, unique personal identifiers, online identifiers, social media usernames, passwords, and other security information for authentication and access, physical characteristics or descriptions;
- **Sensitive Personal Information:** government-issued identification numbers (e.g., social security, insurance policy, driver’s license, state identification, passport, or similar identifiers); precise geolocation when you use the Start Local mobile application to find businesses near you; medical and health information or health insurance information in limited circumstances and with your express consent when a business with whom you intentionally interact uses the Start Local Services to store or process such information; message or email content (and associated metadata) when you choose to link certain third-party messaging or email services (e.g., WhatsApp or Gmail) to your User Account/Profile or when you interact with these services on this Website or in connection with the Services;
- **Financial Information:** credit card number, debit card number, bank account information, and other financial information;
- **Demographic information:** gender, age, employment information, and salary information;
- **Geolocation data;**
- **Internet or other electronic activity:** your browsing, search, and click history, including information about how you navigate within this Website and the Services and which elements of this Website and the Services you use the most, and ratings and reviews or other content you post on this Website or to the Services;
- **Commercial information:** products or services purchased or viewed on this Website or through the Services;
- **Audio and visual information:** your videos and photos (and associated metadata), such as audiovisual content you upload to your user profile and other audio or video recordings initiated by us; and
- **Inferences** drawn from the categories described above in order to create a profile about you to reflect your preferences, characteristics, behaviour, and attitude.

We do not use or disclose sensitive personal information, as defined by California law, for inferring characteristics or for purposes other than those permitted by law. We keep these categories of personal information as long as necessary or relevant for the purposes for which it was collected. We also keep information as required by law.

We may anonymize, aggregate, or otherwise strip any personal information or other information we collect of all personally identifying characteristics and may use or share that aggregated, anonymized data with third parties for any purpose we deem appropriate.

Free Text: Please note that we may collect other Personal Information that you choose to provide in a free-text entry box, either as part of your User Account/Profile or as part of any Content you contribute to this Website or in connection with the Services.

Sources of Collection

We obtain the categories of Personal Information listed above from the following categories of sources:

- 1. We collect information directly from you.** We collect contact information, demographic information, sensitive personal information, audio and visual information, and financial information directly from you. For example, from forms you complete to register for a user account or create a user profile on this Website, when otherwise using the Services, or to provide feedback or suggestions about this Website or the Services. We also collect records of products or services you consider for purchase when you search for businesses on this Website or through the Services, ask questions in our Q&A section, or request quotes or contacts from businesses who advertise with us.
- 2. We collect information from you indirectly or passively.** We collect other identifying information, geolocation data, and internet and other electronic activity passively from you or your computers, devices, or internet browsers. For example, this Website uses “cookies” on your browser that enable us to track your interactions with this Website, the Services, and Ads. Our Apps may also collect geolocation data from your mobile device if you search for a business “near” your current location. This activity is further described in the Cookies and Advertising and Online Tracking sections below.
- 3. We collect contact information and sensitive personal information from you if you choose to link certain third-party email or messaging services** (e.g., WhatsApp or Gmail) to your User Account/Profile or when you otherwise interact with these services on this Website or in connection with the Services. More information about what data may be shared when you choose to link your User Account will be available at the time of selection (e.g., by clicking the “Data and Permissions” tab when selecting an app in the Start Local app marketplace).
- 4. We collect information about you from third parties.** We collect contact information and other identifying information from telephone carriers and providers. For instance, we collect caller ID information from incoming calls to our call tracking numbers, and we receive consumer information for the purpose of publishing White Pages residential telephone directories in certain geographic areas.
- 5. We collect contact information from your contacts.** For example, if another user chooses to use an available referral or share feature on this Website or through the Services (e.g., to send a postcard, listing, page link, contest invitation, etc., to you), we may collect certain Personal Information about you as the recipient of the shared information (e.g., name, address, email address, mobile telephone number). We only use this method of collection if permitted by laws in your jurisdiction.
- 6. We collect contact information and other identifying information from Social Networking Services.** For example, if you use Facebook or Google to sign in to your

account on this Website or to the Services, we collect such information about you that you permit the Social Networking Service to share with us.

7. **We collect contact information, other identifying information, commercial information, geolocation data, and internet and electronic activity from Service Providers** that collect certain Personal Information from or about you on our behalf, such as analytics software or platforms that we use to measure and analyze traffic to this Website, the Services, or interaction with our Ads. For example, our Service Providers capture certain usage data to provide and analyze a “session replay” of your activities on this Website, which allows us to optimize this Website and the Services. The session replay may record, for example, clicks, mouse movements, scrolling, typing, navigation through this Website, and the technical specifications of your device.
8. **We collect contact information, other identifying information, demographic information, and commercial information from third-party data suppliers.** Start Local collects Personal Information such as your name and contact details from third-party data suppliers. If your Personal Information was provided to us by a data supplier, we will have sought their confirmation that they are authorized under privacy laws to provide us with your Personal Information for the purposes described below.
9. **We collect the Personal Information of our clients’ customers.** We may collect contact information, sensitive Personal Information, demographic information, financial information, and other Personal Information from businesses you interact with who use our products and services. For example, our clients may upload and store your Personal Information within our customer management products. We may only access or use this Personal Information in limited circumstances—in our capacity as a service provider to our clients.

Purpose of Collection and How We Use Personal Information

We use your Personal Information for the following categories of use:

- **Transactional Purposes:** We use your contact information, other identifying information, demographic information, sensitive personal information, financial information, and commercial information to:
 - Fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a quote from a business, we will use that Personal Information to facilitate communication between you and the business regarding the quote.
 - We may use your demographic information for the sole transactional purpose of delivering physical Start Local books.
 - Create and update your User Account/Profile.
 - Receive, process, confirm, or communicate with you regarding your request, order, inquiry, or registration.
 - To create, maintain, and secure your User Account/Profile on this Website or in connection with the Services.

- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Consumer Personal Information held by us is among the assets transferred.
- **Analytical Purposes:** We use your other identifying information, internet activity and browsing history, commercial information, demographic information, and geolocation data to analyze preferences, trends, and statistics and direct you to the jurisdiction-specific website based on your location.
- **Marketing and Promotional Purposes:** We use your contact information, commercial information, demographic information, internet or other electronic activity, geolocation data, and inferences to:
 - Inform you of our new products, services, and offers.
 - Provide you with targeted advertising.
 - Run contests, promotions, and sweepstakes.
 - Provide you with other information from and about Start Local, including personalized marketing communications.
 - Help us measure and understand site metrics, such as website traffic and its sources, and conversions to gauge the effectiveness of online advertising.
 - Personalize your experience and deliver you content and offers relevant to your interests, including targeted offers and ads through this Website, on third-party sites, and via email and text message (each with your prior express consent, where required by law), in-app push notifications, or other similar means.
 - Provide you with communications or notices regarding Website and Services operations, our products or services, or happenings that may be of interest to you.
- **Maintenance and Improvement of this Website and the Services:** We use your contact information, commercial information, audiovisual information, and internet activity and browsing history to:
 - Provide you with this Website and the Services, including sending you alerts about your account and providing live chat.
 - Handle your customer service requests.
 - Help us diagnose technical and service problems and administer this Website and the Services.
 - Monitor and improve this Website's and the Services' performance and make it easier for you and other users to use and manage features and programs made available through this Website and the Services.
 - Help us better understand the functionality of our mobile applications on your phone.
 - Provide support, personalize and develop this Website or the Services.

- For feature testing, research, analysis, evaluation, and product development, including to develop and improve this Website and the Services.
- Respond to your feedback, suggestions, and inquiries, investigate complaints, and address concerns about content that violates our policies or improve content quality and accuracy.
- **Security and Fraud Prevention:** We use your contact information, other identifying information, commercial information, financial information, sensitive personal information, geolocation data, audiovisual information, internet activity and browsing history, and inferences to:
 - Protect this Website, the Services, databases, and other technology assets.
 - Protect Start Local and our business.
 - Minimize or prevent fraudulent or bot traffic.
 - Detect and prevent malicious, deceptive, fraudulent, or illegal activity on this Website or the Services.
 - Protect the rights, security, and safety of Start Local personnel and users of this Website and the Services.
 - Respond to law enforcement requests and as required by applicable law, court order, or governmental regulations, or in order to comply with applicable laws, rules, and regulations, such as the Digital Millennium Copyright Act (DMCA) and other applicable intellectual property laws.

We may collect additional Personal Information for other reasonable purposes not stated in this policy. If necessary, at the time of collection, we will provide you with relevant details and, if required by law, seek your consent.

Categories of Third Parties We Share Personal Information With

Service Providers

From time to time, we may establish a business relationship with other businesses whom we believe are trustworthy and who have confirmed that their privacy practices are consistent with ours (“Service Providers”). For example, we may contract with Service Providers to provide certain services, such as hosting and maintenance, data storage and management, and marketing and promotions. We only provide our Service Providers with the information necessary for them to perform these services on our behalf. Each Service Provider must agree to use reasonable security procedures and practices as required by law and appropriate to the nature of the information involved, in order to help protect your Personal Information from unauthorized access, use, or disclosure. Service Providers are prohibited from using Personal Information other than as specified by us.

Our Affiliates or Subsidiaries

We may share Personal Information with businesses controlling, controlled by, or under common control with Start Local, where such affiliates or subsidiaries are acting as our Service Provider, or where required by law.

Third Parties

We may share Personal Information with a third party if you specifically authorize it, or if it is required in order to complete a transaction, provide a product feature, service, or activity that you initiated or requested. Note: In such cases, the collection and processing of your Personal Information may be subject to the privacy policy of such third party.

Cross Contextual Behavioral Advertising

We may share information with third parties in order to provide cross-contextual behavioral advertising. This may include the following categories of Personal Information: other identifying information, geolocation information, commercial information, and internet and other electronic activity.

Corporate Transactions

If Start Local is merged, acquired, or sold, or in the event of a transfer of some or all of our assets, we may disclose or transfer Personal Information in connection with such transaction.

Compliance with Laws and Law Enforcement

We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We may disclose Personal Information and any other information about you to government or law enforcement officials or private parties if, in our discretion, we believe it is necessary or appropriate in order to respond to legal requests (including court orders and subpoenas), to protect the safety, property, or rights of Start Local or of any third party, to prevent or stop any illegal, unethical, or legally actionable activity, or to comply with the law.

Restricted Scope Data

As stated above, notwithstanding any other provision of this Privacy Policy, our transfer or disclosure of Restricted Scope Data will adhere to the Google API Services User Data Policy, including the Limited Use requirements. That is, we only share or transfer Restricted Scope Data for the following purposes: (1) as necessary to provide or improve your experience or use of Gmail through this Website or the Services; (2) to comply with applicable laws; or (3) as part of a merger, acquisition, or sale of assets by us. We do not transfer Restricted Scope Data to serve you advertisements or for any other purpose not listed here.

Cookies

We use cookies (a small text file placed on your computer to identify your computer and web browser) and may use anonymous identifiers (a random string of characters that is used for the same purposes as a cookie). We use cookies and other similar technologies to analyze use of and improve this Website and the Services and as described in the Advertising and Online Tracking section of this Privacy Policy. Most web browsers are initially set up to accept cookies. Your browser may give you the ability to control cookies or other tracking tools. How you do so depends on the type of tool. Certain browsers can be set to reject browser cookies. If you block cookies, certain features on our Website or Services may not work. If you block or reject cookies, not all of the tracking described here will stop. Some of our Service Providers may use their own cookies, anonymous identifiers, or other tracking technology in connection with the services they perform on our behalf.

This Website may provide functionality to allow you to set your cookie preferences. This functionality relies on browser cookies to store your preferences. If you subsequently clear or

delete your browser's cookies, the record of your cookie preferences will also be deleted, and we will not be able to honor your request until you update your preferences again.

We use third-party data analytics tools to analyze how users use the App and Services. For example, we use Google Analytics to provide statistics and analytical tools to analyze how users use the Website. For more information about how to opt out of having your information used by Google Analytics, visit <https://tools.google.com/dlpage/gaoptout/>.

If you are a resident of New Zealand, we may use the Nielsen//NetRatings counting system to track common entry and exit points for the Website or Services, compiling anonymous information about usage of the Website and Services, and randomly and anonymously surveying users of the Website and Services. To do this, our Website and Services may include a small piece of code on each page which accumulates these statistics. For more information and to view Nielsen//Net Ratings' privacy policy, please visit http://www.nielsen-online.com/corp.jsp?section=leg_prs.

Options you make are browser and device specific.

Session Replay Technology

We use session replay technology on our Website. Session replay technology, also referred to as session playback or user experience (UX) replay, collects information regarding, records, and tracks your interactions with a website or application. It then transforms those logged user events (such as mouse movements, clicks, page visits, scrolling, tapping, etc.) into a reproduction of what you actually did on the website or application. We use session replays for quality control, customer service, fraud prevention and security, and marketing purposes. Our session replay technology is owned and operated by a third-party who acts as our service provider. The information collected by this technology may be collected by, transferred to, and stored by our third-party service provider.

ChatBot Technology

We use chatbots to help provide customer service and support, including through the use of a virtual assistant. A chatbot is a software application that mimics human conversations in text or voice interactions on our website or through our customer service hotline. It enables the communication between a human and a machine, which can take the form of messages or voice commands. The chatbot is designed to work without the assistance of a human operator. It responds to questions posed to it in natural language as if it were a real person using a combination of pre-programmed scripts and machine learning algorithms. When asked a question, the chatbot will answer using the knowledge database that is currently available to it. If the conversation introduces a concept it isn't programmed to understand, it will pass it to a human operator. If you use our chatbot service, we will collect any Personal Information you provide to us. We will also create and store a transcript of your chat interaction with us, which will be shared with and stored by our third-party service provider. We use these transcripts and the information you provide for quality control, customer service, fraud prevention, and security.

Advertising and Online Tracking

We may place advertisements and allow third-party companies to serve ads and collect certain information when you visit this Website or use the Services. These companies may use certain information (e.g., click stream information, web browser type, time and date, subject of advertisements clicked or scrolled over) during your visits to this Website and other websites in order to provide advertisements about goods and services likely to be of

interest to you (i.e., for cross-contextual behavioral advertising). These companies may also collect information about your activities on our Website on your current device and combine it with information about your activities on other websites, mobile apps, and devices. These companies typically collect such information using server logs, cookies, web beacons, tags, pixels, mobile advertising IDs (such as Facebook cookies or Google's Advertising ID), cross-device linking, and similar technologies. They may match your browsers or devices if you log into the same online service on multiple devices or if your devices share similar attributes that support an inference that they are used by the same person or household. This means that information about your activity on websites or apps on your current browser or device may be combined and used with information collected from your other browsers or devices. These third-party partners use this information for our and their own advertising, analytics, attribution, and reporting purposes. Our systems do not recognize browser "Do Not Track" signals, but several of our Service Providers who utilize these cookies on this Website enable you to opt out of targeted advertising practices. To learn more about these advertising practices or to opt out of this type of advertising, you can visit www.networkadvertising.org or www.aboutads.info/choices/ (for US residents), or <https://youradchoices.ca> (for Canadian residents) or <http://www.networkadvertising.org/understanding-online-advertising/what-are-my-options>.

Some browsers or browser extensions also allow you to tell websites not to share your information for cross-contextual behavioral advertising through the "global privacy control" signal. We will respond to this signal in a frictionless manner. If you configure this setting on your browser, certain features on our site may not work and you will receive less targeted advertising.

Options you make are device specific.

Residents of some jurisdictions (e.g., California, Virginia, Colorado, Montana) have the ability to opt out of cross-contextual behavioral advertising through other means. Please see the Right to Opt-out of Sale or Sharing section below.

Managing Your Marketing Preferences

Once you have opted in to receive our marketing emails, you can opt out of receiving marketing emails from us by following the Unsubscribe link provided at the bottom of all marketing emails you receive from us. You are able to opt out of receiving marketing emails from us; however, if you continue to use our services we will still need to email you from time to time about your account.

Be Careful When You Share Information with Others

Please be aware that whenever you share information on any public area of this Website or the Services, that information may be accessed by others. In addition, please remember that when you share information in any other communications with third parties, that information may be passed along or made public by others. This means that anyone with access to such information can potentially use it for any purpose, including sending unsolicited communications. We cannot control and are not responsible for what such third parties may do with your information, so you should exercise caution when choosing to share it.

Security

We maintain physical, electronic, and procedural safeguards to help protect the confidentiality and security of information transmitted to us. It is also important for you to protect against unauthorized access of any account password or your computer. Personal

information may be accessed by persons within our organization, or other entities described in this Privacy Policy, or our third-party service providers, who require such access to carry out the purposes described in this Privacy Policy, or as otherwise permitted or required by applicable law.

However, no data transmission over the Internet or other network can be guaranteed to be 100% secure, and no security measures can provide absolute protection. As a result, while we strive to protect information transmitted on or through this Website or the Services, we cannot and do not guarantee the security of any information you transmit on or through this Website or the Services or that you otherwise provide to us, and you do so at your own risk.

Links; Third-Party Platforms

This Website and the Services may contain links to other websites or allow others to send you such links. A link to a third party's website does not mean that we endorse it or that we are affiliated with it. We do not exercise control over third-party websites and are not responsible for their practices. You access such third-party websites or content at your own risk. You should always read the privacy policy of a third-party website before providing any information to the website.

Additionally, the Website or Services may contain or link (via API or otherwise) content provided by third-party sites, providers, or social media platforms such as Facebook and YouTube (collectively, "Third-Party Platforms"). When you interact with such Third-Party Platform(s), including by interacting with third-party content made available on the Website or through the Services, the associated collection and processing of your Personal Information will be subject to the privacy policy of such Third-Party Platform(s). You should review the privacy policies of these Third-Party Platforms before interacting with them.

For example, our Smart local website smart-local.com.au ("Smart Local"), uses YouTube™ API Services. Your interaction with any video identified as being hosted on the YouTube video community is subject to the Google Privacy Policy located at <http://www.google.com/policies/privacy>.

Similarly, our SMS feature made available to customers in the US and Canada uses Twilio to provide the SMS services. If you choose to enable this product feature, your interaction with the SMS service is subject to the Twilio privacy policy located at <https://www.twilio.com/en-us/legal/privacy>.

Children's Privacy

This Website and the Services are intended for and directed to a general adult audience. We do not knowingly collect Personal Information from children under the age of 16. If we become aware that we have inadvertently received Personal Information from a child, we will delete such information from our records.

Processing Location

Please be aware that your Personal Information and communications may be transferred to and maintained on servers or databases located outside your state, province, or country. Please be advised that we store all information in the United States or Australia. Additionally, we may process information in multiple locations, including without limitation, the United States, Australia, Canada, Dominican Republic, the European Economic Area ("EEA"), India,

Israel, Italy, Japan, Mexico, New Zealand, the Philippines, Singapore, and the United Kingdom.

Although we will make all reasonable efforts to ensure your personal information is protected in accordance with our obligations, the laws in these countries may not be as protective of your privacy as those in your location. Personal information processed and stored in another country may be subject to disclosure or access requests by the governments, courts, or law enforcement or regulatory agencies in that country according to its laws. By using this Website or Services, you are agreeing to the collection, use, transfer, and disclosure of your Personal Information and communications, which will be governed by the applicable laws in the United States and/or the applicable country of processing. If you have any questions regarding international data transfers, you may contact us using the contact information we provide below.

Notice to Residents of the United States

If you are a resident of California, or jurisdictions with similar laws (e.g., Colorado, Connecticut, Montana, Oregon, Texas, Utah, Virginia), you may have certain additional privacy rights under the applicable privacy laws in your state (“State Privacy Laws”). This section generally describes those rights and how you can exercise them.

These rights are not absolute. In some situations, we may not be able to process your request. This may include if a legal exception applies. These rights may be offered based on your location. We’ll let you know when or if a right doesn’t apply to you. You will not be discriminated against for exercising a privacy right. Those rights are:

- **Access:** to learn the categories and specific pieces of information we collect, use, disclose, and sell; for those in California, the categories of sources of collection, the third parties to whom the information is disclosed or sold, and the business purpose for such collection or disclosure; for those in Oregon, a list of specific third parties (as defined under Oregon law), to whom we have disclosed Personal Information;
- **Portability:** a copy of (e.g., Virginia, Montana) or specific pieces of (e.g., California) Personal Information collected;
- **Deletion:** to have us delete information we collected from you; and
- **Correction:** asking us to fix your information.

We will also maintain a record of your rights requests.

Please note that if we delete your Personal Information, some of our services will not work the same. For example, your previous opt-out requests will not be saved, and saved preferences and information will no longer be available.

Exercising Your Rights:

To exercise your rights, submit a verifiable consumer request to us by either:

- Calling us **1300 305 488**
- Visit [here](#) to fill out and submit our web form.

Your verifiable consumer request must:

1. Provide sufficient identifying information (including full name, postal address, and email address) to allow us to reasonably verify you are the person about whom we collected and retained Personal Information, and/or your authority to make such request on behalf of the data subject, and
2. Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Note that we will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request or to review and comply with the request.

You may authorize someone to act as your agent and submit a request on your behalf. Due to the sensitivity of such requests, you must verify the agent's authorization before we will act. Accordingly:

- You or your agent must supply proof that the agent is registered with the Secretary of State to act on your behalf; or
- You or your agent must supply other written permission for a specific agent to act on your behalf; and
- We will use your email address to connect directly with you to verify agent identity and authority.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm with a level of confidence appropriate to the sensitivity of the information that the Personal Information we have collected and retained in our systems and databases relates to you.

Making a verifiable consumer request does not require you to create an account with us, but if you have an account with us, we may require you to log in to such account in order to verify your identity or authority or to provide or delete your information.

Right to Opt-out of the Sale or Sharing of Personal Information

Residents of certain jurisdictions (e.g., California, Colorado, Connecticut, Utah, Texas, Oregon, Montana, Virginia) have the right to opt-out of the "sale" or "sharing" of their personal data, as such terms are defined under State Privacy Laws.

Under California law, "share" means disclosing your personal information by us to a third party for cross-contextual behavioral advertising, in exchange for money or anything else of value. Thus, when we use the term "share" under this section, we are using it in the narrow meaning of how it is defined under California law. Other State Privacy Laws do not use the term "share," but describe the concept as using personal information for targeted advertising.

The term "sell" has a different meaning under certain State Privacy Laws. For example, under the laws of California and Colorado, "sell" means exchanging your personal information by us with a third party for money or anything else of value, while under Virginia law, "sell" is the exchange of personal information for money only.

Currently, we participate in digital advertising networks to deliver advertising that is tailored to your interests. The participation in certain ad networks can constitute a "sale" or "sharing" of personal data under State Privacy Laws. The categories of third parties to whom

information may be disclosed in this context include our third-party partners (e.g., advertisers and marketing partners and data analytics providers).

We may “sell” and/or “share” the following categories of Personal Information:

- Online Identifiers;
- Geolocation information;
- Internet/electronic activity;
- Commercial information.

You can also opt-out by broadcasting an Opt-Out Preference Signal, such as the Global Privacy Control (GPC) (on the browsers and/or browser extensions that support such a signal). Note that we will only apply the request to that specific device or browser and only for cookie or pixel-based selling and sharing. Thus, you will need to opt-out on each browser and device where you use our services. If you clear your cookie history on a particular browser or device, your opt-out request will no longer be saved.

To learn more about these advertising practices or to opt out of this type of advertising of your personal data, please visit <https://optout.aboutads.info/> and <https://www.networkadvertising.org/> to opt out. You can also opt out of the re-sale of your Personal Information by other participants in these digital advertising networks by visiting <https://www.iabprivacy.com/optout.html> and opting out of each participant’s digital property. Please note that, otherwise, Start Local does not presently exchange Personal Information for money with anyone, nor does Start Local otherwise “share” or “sell” Personal Information, as such terms are defined under applicable State Privacy Laws. Also, Start Local does not currently disclose Personal Information to third parties for their direct marketing purposes.

Right to Opt-out of Profiling

Residents of some jurisdictions (e.g., California, Colorado, Connecticut, Oregon, Montana, Texas, Virginia) - subject to certain exceptions - may have a right to opt-out of forms of automated processing performed on Personal Information to evaluate, analyze or predict personal aspects related to your economic situation, health, personal preferences, interests, reliability, behavior, location, or movements (“Profiling”).

We engage in cookie-based or digital advertising-based Profiling. To opt out of this practice, please follow the instructions detailed above regarding opting out of the sale or sharing of your Personal Information.

We also engage in Profiling when evaluating individuals for our financial products and services, such as Smart local Pay. The purpose of this Profiling is for security and fraud prevention, and to comply with law. This type of Profiling is not solely automated. Due to the nature and purpose of this Profiling, to the extent you choose to apply for or use Start Local’s financial products and services, you do not have an option to opt-out of this practice.

We may also engage in Profiling when we assess your interaction with this Website and our Services for the purpose of providing you information on additional products and services which may be of interest to you. Note, you can opt out of marketing emails as explained in the “Managing Your Marketing Preferences” section above.

We do not otherwise engage in Profiling.

Right to Limit Disclosure of Sensitive Personal Information

Residents of some jurisdictions (e.g., California) have a right to limit the processing of their sensitive Personal Information (as defined by the applicable State Privacy law). We do not collect or process sensitive Personal Information for inferring characteristics or use or disclose sensitive Personal Information for purposes other than those permitted by law and we do not sell sensitive Personal Information.

Right to Appeal

Residents of some jurisdictions (e.g., Virginia, Montana, Colorado) have a right to appeal our decision on a privacy rights request. If we were unable to fulfill your request, you may appeal our request by submitting our web form available here within fourteen days of our decision, and provide a detailed reason for your appeal, as well as your state of residence.

Notice to Nevada Residents/Your Nevada Privacy Rights

If you are a Nevada resident, please note that Start Local does not sell for monetary consideration the Personal Information of Nevada consumers for the purpose of resale to other entities.

Financial Incentives

We may offer various financial incentives permitted by State Privacy Laws that can result in different prices, rates, or quality levels. Any permitted financial incentive we offer will reasonably relate to your Personal Information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

Notice to Australian Residents

If you are an Australian resident, you may have certain privacy rights under the Australian Privacy Act 1988 (Cth). This section describes those rights and how you can exercise them with Start Local.

Accessing your Personal Information

You can request a copy of the Personal Information that we hold about you by emailing us at **customercare@smart-local.com.au**. There is no charge to submit a request, however, we may apply a reasonable administrative charge for providing access but we'll always check with you first. If we can't give you access, or can only give you access to certain information, we'll tell you why.

Correcting your Personal Information

We do everything we can to make sure the Personal Information we handle is correct, complete, and current. But if you do spot an error, you can correct it via your account, or let us know by contacting us at **customercare@smart-local.com.au**.

Complaints

If you live in Australia and have any complaints regarding our handling of your Personal Information, our response to your request, or our compliance with the Privacy Act 1988 (Cth), please contact our Privacy Officer at customercare@smart-local.com.au. However, if you are dissatisfied with our response, you may raise a complaint with the Office of the Australian Information Commissioner by contacting them at: <https://www.oaic.gov.au/about-us/contact-us>.

Notice to Residents of Canada

If you are a resident of Canada, you may have certain privacy rights under Canadian privacy law.

You have a right to request access to your personal information and to request a correction to it if you believe it is inaccurate. If you would like to have access to the personal information we have about you, or if you would like to have it corrected, please contact us using the contact information provided below or visit here to fill out and submit our web form. Please note that in some cases, we may not be able to allow you to access certain personal information in certain circumstances, for example, if it contains personal information of other persons, or for legal reasons.

To help protect against fraudulent requests for access to your personal information, we may ask you for information to allow us to confirm that the person making the request is you or is authorized to access your information before granting access. For example, we may require you to verify your identity before you access your personal information.

Subject to limitations under the law, you may also withdraw your consent to our processing of your personal information. Please note that this does not affect the lawfulness of processing based on consent before it is withdrawn. Please note that if you seek to withdraw consent to processing of personal data that is necessary for us to provide you with goods or services, we may no longer be able to provide such goods or services to you.

Notice to New Zealand Residents

If you are a New Zealand resident, you have privacy rights under the Privacy Act 2020. This section describes those rights and how you can exercise them with Smart Local.

Holding, Correcting and Updating your Personal Information

If you are an individual, you have rights of access to, and correction of, Personal Information that we hold. We offer the ability to correct or change the information collected at any time and as often as necessary. We may require you to verify your identity before we can give you access to, or change, your Personal Information. We may charge you a reasonable charge that reflects the costs incurred by us in making your information held by us available to you. If you have any questions about how our services work or this Privacy Policy, then please contact us at customercare@smart-local.com.au.

Data Deletion/Data Security

You may permit us to delete Personal Information using the Contact Us form on startlocaldigital.com.au. A recovery feature is offered by us to enable recovery from

accidental deletions for up to 14 days, which may be overridden by us. After any recovery period, we will permanently delete the Personal Information from the live systems. On termination, you have the option to request the return or deletion of Personal Information. This request must be made within 14 days of termination. Thereafter we will permanently delete the Personal Information from the live systems in any event. Following permanent deletion from the live systems, partial data resides on our archival systems for a period of up to 14 days. If requested by you, we may be able to assist with recovery of partial data from these archives during this period.

Complaints

If you live in New Zealand and have any complaints regarding our handling of your Personal Information, our response to your request, or our compliance with the Privacy Act 2020, please contact our Privacy Officer at **customercare@smart-local.com.au**. If you are dissatisfied with our response, then you may raise a complaint with the Office of the Privacy Commissioner.

Privacy Policy Changes

We may change this Privacy Policy from time to time. If we decide to change this Privacy Policy, we will inform you by posting the revised Privacy Policy on this Website. Those changes will go into effect on the effective date shown on the revised Privacy Policy. By continuing to use this Website or the Services, you are consenting to the revised Privacy Policy.