x15 Ventures Privacy Policy

1. About Us
x15 Ventures and its subsidiaries, (x15, We, Us and Our) is a venture-building vehicle. We work in partnership with the tech and innovation community to build, launch and scale new digital ventures. x15 is part of the Commonwealth Bank of Australia Group which includes the Commonwealth Bank and its subsidiaries (the Group).

2. Your privacy is important to Us
At x15, we understand how important it is to keep any personal information We have, including visitors browsing Our website (www.x15ventures.com.au) (Site) private, protected and safe. You can be confident that We comply with the Privacy Act 1988 (Cth) (Privacy Act) and the Australian Privacy Principles for the protection and use of personal information.

This x15 Ventures Privacy Policy (Policy) outlines how We can collect, use, hold and disclose your personal information.

Please read through this Policy carefully prior to accessing or using Our Site, or engaging with Us about a product, service, solution, partnership, business or venture. We update this Policy when things change. You can always find the most up-to-date version on our website.

3. What information do we collect?
When you visit our websites or use our mobile apps We collect your location information, IP address, mobile device and network information, and any third-party sites you access. The recording of such information enables Us to optimise the Site for Our users, without identifying them.

If you are a visitor on Our Website, We will only store your personal information if you input into the Site through an online form or email to Us.

Identity and Related Information
If you engage with Us about a product, service, solution, partnership, business or venture, we will collect the following information from you:

- Your name and contact details, such as your email address and phone number;
- Your capabilities and experience;
- Any personal information provided as part of your pitch and any details you provide related to an idea you may have about such a product, service, solution, partnership, business or venture and;
- Any other information you may provide to Us in your communications with Us (Identity and Related Information).

Information about third parties and service providers
From time to time, We work with organisations who provide services on Our behalf, such as those who assist with sponsorship arrangements or running events. We may collect and share Identity and Related Information with those organisations for those purposes.
Sensitive information

It is unlikely that We will collect sensitive information, such as information about your health or ethnicity, from you but if We need to as part of the work We do with you, we’ll ask your permission and only use it for that purpose.

4. How do We use your information?

We collect, use and exchange your information to:

- Assess the idea about a product, service, solution, partnership, business or venture which you’ve contacted Us about (at times in conjunction with Our strategic partners), to decide whether it has alignment with Our portfolio;
- Improve the products and services which We, and the Group, provide, including sharing your information with businesses and entities which form part of X15 and the Group, to inform these improvements;
- Handle your inquiries and communicate with you on your inquiries;
- Provide any other relevant customer support;
- Maintain a pipeline of people, who We may potentially want to work with in the future;
- Improve and optimise Our Site for visitors;
- Conduct internal system development testing and analysis;
- Research and analytical
- Comply with relevant laws;
- Support Our administrative purposes and any other purposes permitted by law; and
- Any other reason which We specifically notify you of and seek your consent to prior to using your personal information.

If you do not provide Us with the information in whole or in part We may not be able to work with you.

x15 Newsletter

We also collect, use and exchange your name and contact email address to share our newsletter, outlining news, information about x15ventures, career opportunities and events.

In our email newsletters We provide instructions on how to update your information held with us and how to unsubscribe from our newsletter mailing list. Alternatively, you can contact us per the details provided in section 10 below.

Sending data overseas

We may hold or process your information on servers located overseas (Germany and US), for filtering, hosting, mailing list providers, storage purposes, reporting and analytical purposes and for system development testing purposes. If this happens, We require such organisations to have the appropriate data handling and security arrangements in place to ensure compliance with this Policy and the law.
Using data

Improvements in technology enable organisations, like Us, to collect and use information to get a more integrated view of users and provide better products and services. We may combine user information with information available from a wide variety of external sources (for example census or Australian Bureau of Statistics data) to analyse the data in order to gain useful insights. We will only use these insights for the purposes for which we collected your information.

In addition, we may provide data insights or related reports to others, for example to help them understand their customers better. These are based on aggregated information and do not contain any information that identifies you.

Do We use information for direct marketing?

We may use personal information We collect about you to provide direct marketing offers for products and services, which We think, may be of interest to you, unless you tell Us not to by opting out at any time. Opt-out may be in the form of an email or other electronic means.

By submitting an email to Us or completing an online form on the Website, you are agreeing to be contacted by Us for purposes We prescribe using the personal information you have provided. This includes for responding to your product, service, solution, partnership, business or venture idea, responding to your queries, re-publishing information on our site, and use of our databases to share general information and updates about Us with you.

5. Cookies and analytics

What are cookies?

Cookies are small data files that are downloaded from our web servers and stored on your hard drive. A cookie is a string of letters and numbers that uniquely identifies the computer you are using.

How We use cookies on Our Site

Cookies are used on the site to track your journey through our site and the type of cookie We use collects no personal information at all. This simply allows Us to see at a glance which pages and information is of most interest to visitors and members. Most browsers can be configured to refuse to accept cookies. You can also delete cookies from your hard drive. However, doing so may hinder your access to valuable areas of information within our site.

Google Analytics Advertising Features and the cookies it uses

We use Google Analytics features based on Display Advertising. You can opt-out of Google Analytics Advertising Feature by using the Ad Settings. In addition, you can use the Google Analytics Opt-Out Browser Add-on to disable tracking by Google Analytics.

We use Google Analytics Demographics and Interest-Reporting to understand the spread of age ranges, gender, and geographic locations of Our users. This enables Us to tailor the Site, content and Our marketing around Our users' interests.
We may use “Remarketing” with Google Analytics to advertise online. This will utilise different cookies. Third-party vendors, including Google and media agencies, show Our ads on websites across the internet. These third-party vendors use the cookies on Our Site to inform, optimise and serve ads based on your past visits to Our Site.

For further information about how Google Analytics collects and processes information, please refer to “How Google uses data when you use Our partners’ sites or apps”, (located at www.google.com/policies/privacy/partners/).

6. Who do we share your information with?

We may share your information with other organisations that are part of x15 or the Group, including those subsidiaries located outside Australia. Generally, We also disclose personal information to organisations that help Us with the operation of Our business. These may include:

- Our current and prospective strategic partners;
- Our suppliers, agents, associates, contractors and external service providers (including, for example, call centres, stationery printing houses, mail houses, information technology, marketing agencies, and marketing research companies);
- Our financial advisers, legal advisers or auditors;
- Regulatory bodies, government agencies and law enforcement bodies in any jurisdiction; and
- External dispute resolution schemes.

We may also provide personal information about you to external organisations in circumstances where We are required or authorised by law, or with your express consent.

Sometimes We may send your information overseas. Where we do, we make sure there are arrangements in place to protect your information.

7. Keeping your information safe

We take great care with the information We hold about you. Our aim is to ensure that details are securely protected from misuse, interference, and unauthorised access, modification or disclosure. We take reasonable care to make sure that We keep your information in an accurate, complete and up-to-date manner.

Our Site is professionally hosted and operates in a secure environment. Our Site uses encryption techniques to enhance your privacy and security when using Our Site. You should however be aware that there is always an inherent risk in transmitting your personal information via the internet, including by email.

8. Accessing, updating and correcting your information

You can contact Us and ask to access, update and correct your information. For more detailed information, you may need to fill out a request form. If your information isn’t correct or needs updating, let Us know straight away.

9. Making a Privacy Complaint

We try to get things right the first time – but if We don’t We’ll do what We can to fix it. If you are concerned about your privacy, you can make a complaint (via the contact details below) and We’ll do Our best to sort it out.
Once the complaint has been received, we’ll look into the issue and try to resolve it as soon as possible. If we can’t we’ll write to you to let you know how we’ll manage the complaint. You can find more about how we handle complaints in our [Complaints Policy]

If you’re not satisfied with how we manage your complaint or our decision after you’ve been through our internal complaints process, the Australian Financial Complaints Authority (AFCA) offers a free independent dispute resolution service for consumer and small business customers of financial service providers. You can contact AFCA between 9am and 5pm (Sydney time) Monday to Friday on 1800 931 678 or at www.afca.com.au

If your complaint is about how we handle your personal information, you can also contact the Office of the Australian Information Commissioner (OAIC) on 1300 363 992 or at www.oaic.gov.au

10. Contact Us

You can contact us via email at complaints@x15.com.au, through this online form or in writing at X15 Ventures, Ground Floor Tower 1, 201 Sussex Street, Sydney, NSW, 2000.

If you’re a customer of our ventures, each business has their own privacy policy, and processes for handling access and correction requests, complaints and marketing opt-outs.

You can find their privacy policies on their respective websites:

Backr
Credit Savvy
Doshii
Home-In
Vonto