



**BLUEPINEAPPLE COMPLIANCE TEAM**

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# Information Privacy Policy

For Internal & External Circulation

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Nebbia Technologies India Pvt Ltd  
Bluepineapple Pty Ltd (AU)  
30 October 2019

Note: Throughout this document, the company names Bluepineapple Pty Ltd, Nebbia Technologies India Pvt Ltd and the brand name Bluepineapple are used interchangeably and are meant to indicate the company and its subsidiaries in India, Australia and other countries.

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## Privacy Policy

*This policy document lists out the information handling and privacy policies and practices for information security implementation and compliance.*

Effective as of October 30, 2019, Nebbia Technologies India Pvt Ltd., (“Bluepineapple”) and its subsidiaries, (collectively, the “Bluepineapple” or “we” or “us” or “our”) have updated our Privacy Policy (“Policy”).

This Policy details our commitment to protecting the privacy of individuals who:

1. visit our Websites (“Website Visitors”) or individuals who request us to contact them via our online web forms
2. who contract with us for products and services, or
3. attend or register to attend sponsored events or other events at which Bluepineapple participates (“Attendees”).

We are bound by the Information Technology Act (2000), India and the Information Technology (Amendment) Act (2008), India which contain provisions for the protection of electronic data.

In Australia, we are bound by the Privacy Act 1988 (Cth) (Privacy Act) and, in particular, by the Australian Privacy Principles (APPs), which contains standards and provisions for collection, use and disclosure, quality and security of “Personal Information”.

This Privacy Policy explains the way in which we handle Personal Information, and the ways in which you can contact us about the Personal Information that we hold about you.

### **What is personal information?**

"Personal information" is information about an identified, or reasonably identifiable, individual. This includes your name, your date of birth, your contact details, and professional information such as your title and the name of your employer.

### **Collecting your personal information**

Bluepineapple provides IT services to a range of businesses, providing consulting services on cloud computing strategy and implementation, and innovate solutions

on various cloud computing platforms including Salesforce, ServiceNow, Amazon Web Services. As part of its services, it may collect a range of personal data, including names and titles, contact details (including email, telephone, and home and office addresses), and any other personal information that may be provided from clients or business partners as part of contracts or for implementation or data migration services.

Other than the above information, we also collect the following personal information:

- if you apply for employment with us, information relating to your application, including your visa status and eligibility to work in Australia and any information arising out of any background checks; and
- any other personal information that is reasonably necessary for the purpose of running our business.

## **Our purposes for handling personal information**

We handle personal information:

- for the sake of implementing a solution for a client, but only in accordance with the client's instructions;
- to contact our business associates;
- to maintain our business records;
- to provide business associates with information about products and services that may of interest to them;
- to assess any applications you make to us as a prospective employee, such as obtaining a reference from your current or previous employer;
- for any purpose required or permitted by law;
- for any purpose you would otherwise reasonably expect
- for any purpose disclosed to you and to which you have consented, and
- to otherwise run our business.

## **Disclosing your personal information**

When we provide our services, we may disclose your personal information to our related companies, business partners, professional advisers (such as lawyers, accountants or auditors), external service providers (such as mailing houses and information technology service providers) and regulatory bodies and government authorities as required or authorised by law.

We securely store your personal information in the Cloud, using enterprise or specialist providers such as Salesforce, Zoho or Google.

Where Bluepineapple receives personal information from its clients, which relate to the client's clientele, Bluepineapple handles the data in accordance with the instructions of the relevant customer, and subject to this policy or the client's specific instructions otherwise, will not disclose that information.

## **Security of your personal information**

We hold your personal information in both paper-based and electronic files. We seek to ensure that your personal information is protected from:

- misuse, interference and loss; and
- unauthorised access, modification and disclosure.

The personal information that we hold is treated as confidential and only accessed when necessary. We seek to ensure that those that we disclose it to are bound by obligations of privacy and confidentiality.

## **Accessing your personal information**

You may request access to the personal information that we hold about you by contacting our Privacy Officer on [privacy@bluepineapple.io](mailto:privacy@bluepineapple.io). If we refuse access to your personal information, we will provide you with a written notice which sets out the reasons for our refusal. We may recover our reasonable costs (if any) in responding to a request for access to your personal information.

## **Correcting your personal information**

We seek to ensure that the personal information that we collect about you is accurate, up-to-date and complete and, in the case of our use or disclosure of that information, relevant as well.

If you believe that any information that we hold about you is incorrect, you may request us to amend it by contacting our Privacy Officer on [privacy@bluepineapple.io](mailto:privacy@bluepineapple.io).

## Marketing

We may use the personal information of our clients and business associates to provide them with information about product and services or investment opportunities which we think may be of interest to them. We may do this while we have a current business relationship with you, even if you are on the Do Not Call Register. You may **opt out of receiving marketing communications** from us at any time if you no longer wish to receive this information. In order to do so, simply contact our Privacy Officer on [privacy@bluepineapple.io](mailto:privacy@bluepineapple.io) and request that we no longer send marketing communications to you or otherwise opt out by clicking the unsubscribe link in our communications.

## Children's Personal Information

We do not knowingly collect any personal information from children under the age of 13. If you are under the age of 13, please do not submit any personal information through our Websites or Services. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce this Policy by instructing their children never to provide personal information through the Websites or Services without their permission. If you have reason to believe that a child under the age of 13 has provided personal information to us through the Websites or Services, please contact us at [privacy@bluepineapple.io](mailto:privacy@bluepineapple.io), and we will use commercially reasonable efforts to delete that information.

## Business Transactions

We may assign or transfer this Policy, as well as your account and related information and data, including any personal information, to any person or entity that acquires all or substantially all of our business, stock or assets, or with whom we merge. If we do, we will inform them of the requirement to handle your personal information in accordance with this Policy.

## Questions and complaints

If you have any questions, or if you believe that we have not complied with our obligations under the Privacy Act, or if you believe that the security of the personal information that we hold about you has been compromised in any way, please contact our Privacy Officer on [privacy@Bluepineapple.io](mailto:privacy@Bluepineapple.io). We will respond as

soon as possible. If you are dissatisfied with our response, you may direct your complaint to the Office of the Australian Information Commissioner by email at [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au) or by telephone on 1300 363 992.

## **Changes to this Privacy Policy Privacy**

We may make change to this Privacy Policy from time to time without prior notice to you. The current version of our Privacy Policy is available on our website at [www.bluepineapple.io/privacy](http://www.bluepineapple.io/privacy). If you are not able to access the Privacy Policy online, please contact us if you would like us to send you a copy of the policy.