

SCRIBERS Privacy Policy

The SCRIBERS team (herein SCRIBERS, 'we', 'us', or 'our'), owners of the SCRIBERS platform and application ('SCRIBERS App'), is strongly committed to protecting your Personal Information in accordance with the Australian Privacy Principles (APP) set out in the Privacy Act 1988 (Cth).

1. Application

1.1 General: This Privacy Policy describes how we collect, hold and use your Personal Information when you use or download the SCRIBERS App or access the SCRIBERS website at: www.scribers.co ('SCRIBERS Website'). We review and update this Privacy Policy as necessary. The most recent Privacy Policy viewable on the SCRIBERS App will always govern our conduct regarding Personal Information. Where any terms are not defined in this Privacy Policy, they are defined in our Terms and Conditions, accessible once the full SCRIBERS Website is up and running.

1.2 Foreign users: This Privacy Policy applies to foreign users, and applies regardless of local foreign laws. This Privacy Policy also applies despite conflicting international regulations and standards, but will be invalid to the extent of inconsistency with applicable regulations and standards which cannot be overridden by national laws.

1.3 Sharing: The SCRIBERS App allows you to share certain information, (which may be Personal Information) you provide to us. It is YOUR choice to share this information and we cannot guarantee that the entities or persons with whom you share that information abide by the APP's. Our responsibility is limited to ensuring that OUR collection, use and disclosure of your Personal Information conforms with the required privacy regulations.

1.4 Third-Party Websites: Please note that we cannot and do not assume any responsibility for the privacy or security practices of any other websites which you may be able to access through the SCRIBERS App or SCRIBERS Website. If we provide links, we try to link only to websites that share our high standards and respect for privacy, but we are not responsible for the content or the privacy practices of those sites.

2. What is "Personal Information"?

2.1 Personal Information is any information or opinion about a person, whether true or not, from which that person may be identified. This Information may include:

- (i) Personal details you submit to us or information about you that another entity submits to us;
- (ii) Your mobile phone number and device details;
- (iii) Your physical location (for example GPS signals sent by your mobile device);
- (iv) Data on your Internet activity from third parties;
- (v) Session information stored in cookies, but not on a personal basis.

3. When and what type(s) of Personal Information do we collect?

3.1 So that you can receive and participate in the services offered on and via the SCRIBERS App, to allow us to maintain the SCRIBERS App and SCRIBERS Website, and for us to conduct our related business functions, we need to collect certain Personal Information.

3.2 If you access the SCRIBERS Website, or download the SCRIBERS App, we may collect information such as:

- (i) your name, gender, date of birth;
- (ii) credit card information, bank account information;
- (iii) a SCRIBERS Profile User Name and password;
- (iv) a visual image of yourself from which you might be identifiable; and
- (v) your contact details, such as your address, phone numbers and email (personal or work).

Mobile Data

3.3 When you use certain features of the SCRIBERS Services, in particular the SCRIBERS App, we may receive, store and process different types of information about your location, including general information (e.g., IP address, zip code) and more specific information (e.g., GPS-based functionality on mobile devices used to access the SCRIBERS Services or specific features of the platform). If you do not want your device to provide us with location tracking information, you can disable the GPS or other location tracking functions on your device (if your device allows this). See your device manufacturer's instructions.

3.4 We may also collect the Personal Information referred to in this clause, and further information if you do not download the SCRIBERS App or access the SCRIBERS Website BUT you: request information about SCRIBERS, or its products or services; provide feedback; or contact us, including our customer service or support team by telephone, facsimile, email, post or in person.

Information collect from third-parties

3.5 We may also collect Personal Information about you from third-parties. Such third-parties may include advertising organisations, sales organisations or other organisations with which we team or partner, such as with our Financial Service Provider (collectively, our 'Service Partners').

3.6 We may collect data on your Internet behaviour from Facebook, other social-media sites and other services.

3.7 We might be provided with Personal Information about you by other SCRIBERS App users.

3.8 *However* we will only collect information from third-parties if we cannot reasonably or practicably collect this information directly from you.

4. Information collected via the Internet generally

4.1 We may collect Personal Information from you when you:

- (i) download the SCRIBERS App, visit or browse the SCRIBERS website, through any device and via any browsing pathway;
- (ii) register to receive email updates and information about the SCRIBERS Services, or about our Service Partners' product and business information;
- (iii) fill out an online job application for a position with SCRIBERS, our related entities or Service Partners, provide feedback, or fill out a form requesting information; and
- (iv) otherwise knowingly provide Personal Information to us.

Log Data

4.2 We may also receive, store and process Log Data, which is information that is automatically recorded by our servers whenever you access or use the SCRIBERS Services, regardless of whether you are registered to use the SCRIBERS services. This information could include can be collected from your Internet browser and computer and could;

- (i) your IP Address, the date and time you access or use the SCRIBERS Services;
- (ii) the hardware and software you are using, referring and exit pages and URLs;
- (iii) the number of clicks, pages viewed and the order of those pages; and
- (iv) and the amount of time spent on particular pages.

Click-Stream Data

4.3 When you access the SCRIBERS Website or download the SCRIBERS App, our website host and application provider, respectively, may collect Personal Information, for statistical, reporting and maintenance purposes.

4.4 Subject to clause 4.4, the Personal Information collected by our website host or application provider will not be used to identify you. The information may include:

- (i) the number of persons viewing the SCRIBERS Website and the number of downloads of the SCRIBERS App;
- (ii) the date, time and duration of a download or view; or
- (iii) details of the device used to view the SCRIBERS Website or download the SCRIBERS App.

4.5 Our Website host and application provider use this information to administer and improve the performance of the SCRIBERS Website, SCRIBERS App, the SCRIBERS Services and other related services, and to monitor downloads.

Cookies

4.6 Cookies are small text files that are transferred to a user's computer hard drive by a website for the purpose of storing information about a user's identity, browser type or website visiting patterns. A cookie is downloaded onto your device's hard drive when you first access the SCRIBERS Website.

4.7 We may use cookies and anonymous identifiers for a number of purposes including: to access your information when you sign in to our SCRIBERS Services; keep track of your preferences; direct specific content to you; report on the SCRIBERS user base; and to improve our services. We may also use cookies or anonymous identifiers when you interact with our affiliate service providers (for example, when you integrate your SCRIBERS account with your Facebook profile).

4.8 We may also allow our business partners to use their cookies and other tracking technologies on your access to the SCRIBERS Services. As a result, when you access or use the SCRIBERS Services, you will provide or make available certain information to us and to our business partners.

4.9 You can adjust your Internet browser to disable cookies, but we may not be able to provide you with all the service or functionality you require from our SCRIBERS Website if you choose to do so.

5. Children's Privacy

5.1 The SCRIBERS App and SCRIBERS Website are not marketed directly to children. Like any ordinary bookstore, the SCRIBERS App and SCRIBERS Website host books that may contain adult themes and situations not recommended for children. We take multiple steps to ensure this content is not presented to children. First, we ask a member's age range at registration. Young adults and children under age 18 are blocked from viewing content that contains adult situations or content deemed to be objectionable to children. We have three means for identifying potentially objectionable material:

- (i) We allow authors to specify if their works are suitable for children.
- (ii) We allow members to flag works they believe are unsuitable for children.
- (iii) We warn members of potentially objectionable content before they click through to it.

SCRIBERS recommends children to not create a profile unless permission of the Child's Legal Guardian(s) is obtained.

5.2 With consent of their Legal Guardian(s), children, should they wish to join, are allowed to become members. In this circumstance we endeavour to ensure our use, disclosure and storage of Children's Personal Information is appropriate and lawful. We further try to ensure that this information is kept secure and safe from misuse by us, or third-parties.

6. How do we use your Personal Information?

6.1 We may use your Personal Information to:

- (i) deliver the SCRIBERS Services offered through the SCRIBERS Website and SCRIBERS App;
- (ii) provide you with the information, products or services you have requested;
- (iii) notify you when there are issues with the SCRIBERS Website or SCRIBERS App, affecting your experience;
- (iv) promote and market our SCRIBERS Services and other products and services to you;

- (v) promote and market the products and services of our Service Partners;
- (vi) personalise and customise your experiences with our SCRIBERS Services;
- (vii) communicate with you;
- (viii) help us research the needs of our customers and to market our SCRIBERS Services with a better understanding of your needs and the needs of customers generally;
- (ix) conduct research for the purposes of improving our existing products and services or creating new products or services;
- (x) provide you with ongoing information (including but not limited to information about events, offers, discounts and promotions) about SCRIBERS or our Service Partners in which we believe you may be interested; and
- (xi) to give you the opportunity to receive advertising materials from us.

6.2 We may collect and use your Personal Information for other purposes not listed above. If we do so, we will make it known to you at the time we collect or use your Personal Information.

6.3 We will only collect and use your Personal Information in accordance with this Privacy Policy.

6.4 If you choose not to provide your Personal Information to us for the purposes set out in this Privacy Policy, you will not be able to download the SCRIBERS App and create a profile on the SCRIBERS Website, and we may not be able to provide you with requested information or with our SCRIBERS Services.

7. To whom do we disclose your Personal Information?

7.1 Depending on the nature of your engagement with us, we may disclose your Personal Information to:

- (i) our related entities and Service Partners;
- (ii) third-parties that provide products and services to us, such as our Financial Service Provider or directly to you (at your request);
- (iii) our media partners for the purpose of marketing the SCRIBERS Services to you;
- (iv) third-parties such telecommunications companies for identification verification, including verification that you are an authorised user of the nominated credit card;
- (v) fulfilment houses and distributors; and
- (vi) other third-parties such as your referee(s).

7.2 We use third-party intermediaries to manage credit card processing and other financial transactions of SCRIBERS Users via the SCRIBERS App and SCRIBERS Website. These intermediaries are not permitted to store, retain or use your billing information, or other financial or personal information, except for the sole purpose of credit card processing on our behalf.

7.3 We may disclose your Personal Information to third-parties that provide products and services to us in order for us to provide you with information, or services you have requested. In such cases, your Personal Information may be disclosed outside of Australia to a foreign entity but solely for this purpose, and we will take measures to ensure the foreign entity can comply with the APP's.

7.4 We may also share such information if we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Terms or other terms of use we may prepare, or as otherwise required by law.

Third-party social plugins

7.5 We use social plugins, provided and operated by third-parties (such as Facebook's Like Button).

7.6 Consequently, you may send the information that you are viewing via the SCRIBERS Services to those third-parties. If you are not logged into your account with the third-party, then the third party may not know your identity. If you are logged into your account with the third-party, then the third party may be able to link information about your access to our SCRIBERS Service to your account with them. Similarly, your interactions with the social plugin may be recorded by the third party.

7.7 Please access the third party's privacy policy for information about its privacy practices.

Marketing

7.8 We may use your Personal Information to provide you with promotional material about us or our Service Partners or about our product or services and the products or services offered by our Service Partners. If you do not wish to receive promotional information, you can use the unsubscribe facility provided for in each communication you receive from us.

7.9 Unless otherwise specified in this Privacy Policy, the Apple and Android application provider will not disclose any of your Personal Information to any other organisation unless the disclosure is required by law or is otherwise permitted by the APP's.

Aggregated data

7.10 De-identified aggregated data may be disclosed to third-parties including our Service Partners for marketing and other purposes, subject to a reasonable assessment by us of any potential privacy issues in order to ensure that you cannot be identified or re-identified through the release of such information.

8. How do you access your Personal Information?

8.1 You are entitled to access Personal Information that we hold about you. If you request access to your Personal Information, we will grant your request unless this would unreasonably impact upon the privacy of others or is not otherwise permitted under law or the APP's. If we refuse your request, we will provide you with reasons for the refusal. We reserve the right to charge you a reasonable fee for meeting your request.

9. Updating, storage and security of Personal Information held by Us

9.1 We aim to keep your Personal Information secure and up to date. Personal Information collected via the SCRIBERS Website, SCRIBERS App, or by us through our products or services in any other way, or that is held on our computer systems, is protected by safeguards (including through physical, technical and procedural methods).

9.2 Personal Information that is held by us in hard copy is stored securely on our premises (or the premises of our third-party agents or contractors) and is only disclosed or used for the purposes described in this Privacy Policy.

9.3 You can update your contact and Personal Information at any time through your member profile. If we find that we have no further need for your Personal Information we may remove it from our systems and destroy all record of it. We welcome any updates or changes to your details to keep our records up to date.

10. Getting your questions and concerns answered

10.1 If you feel that your privacy has not been respected or we have not complied with this Privacy Policy, or for any other queries or communication in relation to this Privacy Policy, please get in touch with us.