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## GoBroProtect Privacy Policy

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At Persephone Projects Pty Limited (ABN 15 660 532 990) (**we, us or our**), we understand that the privacy of your personal information is important. This Privacy Policy sets out how we handle the personal information we collect from you in connection with the GoBroProtect application (the **App**).

We may modify or amend this Privacy Policy from time to time. If you have subscribed to use the App, such changes will be notified to you in accordance with clause 1(b) of our GoBroProtect terms of use. This Privacy Policy was last updated on 23/06/2023.

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### 1 Types of information we collect

- (a) Throughout this Privacy Policy, we refer to “personal information”, which means information or an opinion about an individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in a material form or not.
- (b) Two types of data are collected as a result of your access and use of the App and our website ([www.gobroprotect.com](http://www.gobroprotect.com)) (**Website**):
- (i) account-level data, which we refer to as **Account Data**. This normally consists of your name, email address, phone number, username, and password. It may also include other information you may choose to send us outside the App, for example if you contact us by email; and
  - (ii) data collected from your device through your use of the App, which we refer to as **Usage Data**. The Usage Data we collect depends upon how you have configured the App. You can go into the App’s settings on your device to control which of the following types of Usage Data you would like the App to record, track, or measure by turning on / off this functionality for each type of Usage Data, or by using ‘catchword capture’ to voice activate the data collection of certain kinds of pre-selected Usage Data:
    - (A) audio;
    - (B) video;
    - (C) location;
    - (D) movement;
    - (E) device screentime;
    - (F) battery health;
    - (G) interaction with the phone; and
    - (H) phone and data usage, including phone and data usage for telephone calls, texting, SMS, and IMS calls, and data usage for communication apps like WhatsApp and WeChat.

Because your Account Data and Usage Data is connected with the registration information you provide to us, it may constitute personal information.

- (c) We also operate a website associated with the App, at [www.gobroprotect.com](http://www.gobroprotect.com) (our **Website**). Our Website may use cookies to collect certain information about your online activity and interactions with our Website, and to allow us to keep track of analytics and certain statistical information which enables us to improve our Website (**Website Data**). Website Data will be associated with you once you login with your credentials. If you do not login in with your credentials, Website Data on its own is unlikely to personally identify you, although it may include information specific to you such as your IP address.
- (d) If you do not provide us with Account Data, we will be unable to let you register and subscribe to use the App. You do not have to provide us with Usage Data, and you can choose which Usage Data is captured by the App and therefore stored by us for you, using the App's settings (however this may limit the functionality and usefulness of the App). If you do not login to our Website, you will be unable to use those features that are available when you do so.

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## 2 How we collect and hold your personal information

- (a) We normally only collect personal information directly from you through your use of the App or Website, or if you choose to contact us.
- (b) Usage Data may be temporarily stored on your device, and is also stored by us on your behalf in the cloud (using our cloud service providers), as described in the App terms of use. Account Data and Website Data is normally stored in electronic form on our corporate IT systems (which may include cloud services), and occasionally in physical (hard copy) form.

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## 3 Purposes for which we use your personal information

- (a) We collect, hold, use and disclose your personal information for the following purposes:
  - (i) to provide you with the App and associated services (such as storage of Usage Data and generation of analysis or composite reports on your behalf);
  - (ii) to comply with our legal obligations;
  - (iii) any other purpose with your consent; and
  - (iv) in the case of Account Data and Website Data:
    - (A) managing our relationship with you;
    - (B) improving the App and our services by way of data analytics and other means;
    - (C) conducting marketing activities, such as promoting the App and our services;
    - (D) gauging website visitor traffic, trends, and delivering tailored content to you when you are using our Website; or

(E) as permitted by law.

- (b) If you opt in to our marketing communications, you give us your consent to send you information about our App or other services that may be of interest, opportunities and offers, and other information about our services, using the means of contact that you provide to us as part of your Account Data (which may include telephone, SMS or email). Such consent will continue indefinitely, until you notify us that you wish to opt-out of receiving such communications. You may opt out of these marketing communications at any time by using any unsubscribe links that we provide to you, or by contacting us as described in section 7 below.

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#### **4 How we share your personal information**

We will not sell, rent or trade your personal information to or with any third party.

Your personal information is only disclosed to:

- our service providers, on a confidential basis;
- persons that you authorise us to make such disclosures to; and
- other persons as required by law.

We may disclose your personal information to third party service providers that are located outside Australia, including in the United States or Singapore, however this may change in the future and if it does, we will update this privacy policy accordingly.

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#### **5 How we secure your personal information**

We take reasonable steps to help protect the personal information we hold about you from misuse, interference or loss, and from unauthorised access, modification or disclosure.

This includes the use of third party developers and cloud service providers that we believe are highly regarded, and using encryption protocols to encrypt data (which may include personal information) both in transit and at rest.

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#### **6 How to access and correct your personal information**

- (a) You may be entitled to access the personal information we hold about you, including for the purpose of correcting that personal information.
- (b) Certain Account Data and Usage Data can be accessed and (in the case of some Account Data) updated through the App.
- (c) If you wish to access or correct other personal information we hold about you, we may require you to put any such request in writing for security reasons. Before we provide you with access to any personal information, we will require some proof of identity. For most requests, your information will be provided free of charge, however we may charge a reasonable fee if your request requires a substantial effort on our part. If we refuse to provide you with access to the information, we will normally provide you with the reasons for our refusal.

- (d) If the personal information we hold about you is inaccurate, incomplete, irrelevant or out-of-date, please update it via the App (where possible), or contact us and we will take reasonable steps to either correct this information, or if necessary, discuss alternative action with you.
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## 7 How to contact us

If you have any questions or complaints regarding our collection, use or management of your personal information or would like further information about our privacy practices, please contact us by any of the following means.

**By post:**

Attn: Persephone Projects, The Privacy Officer  
Post Box 770, North Sydney, NSW 2059

**By email:**

Email: [contact@gobroprotect.com](mailto:contact@gobroprotect.com)

If you wish to make a complaint about our privacy practices, we ask that you send us your complaint in writing to the email address listed above. We endeavour to respond to complaints within a reasonable period (usually 30 days). If you are not satisfied with our response, you may be entitled to make a complaint to the Office of the Australian Information Commissioner by submitting an online privacy complaint form at their website [www.oaic.gov.au](http://www.oaic.gov.au) or phoning 1300 363 992.



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