

# PRIVACY POLICY

*Last updated: 1<sup>st</sup> October 2024*

This privacy policy governs Your use of the software application 'KODO' created by Sonata Software on behalf of Content Providers.

Your privacy is important to us. Sonata Software is committed to ensuring the security and confidentiality of personal information You provide to us through KODO.

Our privacy policy explains:

- What information we collect
- How that information is used and stored.
- What choices You have in providing the information

Reading this privacy policy will help You understand Your privacy rights and choices. If You do not agree with policies or practices, please do not use KODO.

## Definitions

For the purposes of this Privacy Policy:

'KODO' (also 'Service') is the mobile or web application used for the collection of feedback/reviews from You about Your experience at designated outlets through the completion of an online questionnaire.

'Content Provider' is the entity referred to in the survey content and to which the survey requests information.

'You' means You as the user of KODO and 'Your' has the corresponding meaning.

## What information does KODO collect and how is it used?

### Information provided by You.

We collect personal information that You voluntarily provide to us when participating in a KODO survey. The personal information we collect may include the following:

- Name
- Phone numbers
- Email addresses
- Images

### Automatically Collected Information

We automatically collect certain information when You visit, use or navigate KODO. This information may include device and usage information, such as Your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how or when

You use KODO, and other technical information. This information is primarily needed to maintain the security and operation of our services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

The information we collect includes:

1. **Log and Usage Data**  
Log and usage data is service-related, diagnostic, usage and performance information our servers automatically collect when You access or use KODO and which we record in log files. This log data may include Your IP address, device information, browser type and settings and information about Your activity in KODO (such as the date/time stamps associated with Your usage, pages and files viewed, searches, and other actions You take such as which features You use), device event information (such as system activity, error reports and hardware settings).
2. **Device Data**  
We collect device data such as information about Your computer, mobile, tablet or other device You use to access KODO. Depending on the device used, this device data may include information such as Your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, internet service provider and/or mobile carrier, operating system and system configuration information.
3. **Location information.**  
We collect location data such as information about Your device's location. For example, we may use GPS and other technologies to collect geolocation data that tells us Your current location. You can opt out of allowing us to collect this information either by refusing access to the information or disabling Your location settings on Your device. However if You choose to opt out, You may not be able to use certain aspects of KODO.
4. **Cookies and similar technology.**  
A 'cookie' is a small data file that is sent to Your browser from a website that You visit and stored in Your device internal memory. KODO uses cookies to identify repeat submissions from same browser. Third party code and libraries used by KODO may use cookies to collect information and to improve their services. . You have the option to either accept or refuse these cookies by adjusting Your browser settings. However if You choose to refuse cookies, You may not be able to access some or all aspects of KODO.

### **How do we process Your information?**

We process Your information to provide, improve and administer KODO, for security and fraud prevention and to comply with law. We may also process Your information for other purposes with Your consent.

- To deliver and facilitate delivery of services. We may process Your information to provide You with the requested service.
- To protect our services. We may process Your information as part of our effort to keep KODO safe and secure, including fraud monitoring and prevention.
- To identify usage trends. We may process information about how You use KODO to better understand how it is being used so we can improve it.
- To save or protect an individual's vital interests. We may process Your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

## What legal bases do we rely on to process Your information?

We only process Your personal information when we believe it is necessary and we have a legal basis to do so under applicable law, like with Your consent, to comply with laws, to provide You with usage of KODO, to protect Your rights, or to fulfil our legitimate business interests.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process Your personal information. We may rely on the following legal bases to process Your personal information:

- **Consent.** We may process Your information if You have given us permission to use Your personal information for a specific purpose. You can withdraw Your consent at any time by contacting us.
- **Legitimate Interests.** We may process Your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh Your interests and fundamental rights and freedoms. For example we may process Your personal information in order to:
  - Analyse how KODO is used so we can improve them to engage and retain users
  - Diagnose problems and/or prevent fraudulent activities
- **Legal Obligations.** We may process Your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose Your information as evidence in litigation in which we are involved.
- **Vital Interests.** We may process Your information where we believe it is necessary to protect Your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety or any persons.

## When and with whom do we share Your personal information?

Information may be shared with Content Providers for issuing coupons (where applicable), for contacting You directly where You have requested this and for investigating fraudulent/unusual activity related to their sites.

In addition, information may be accessed by other 3rd parties who perform services for us or on our behalf and require access to such information to do that work. The categories of 3<sup>rd</sup> parties we may share personal information with are as follows:

- **Data Analytics services.** KODO uses Google Analytics to help understand app traffic and usage. By using KODO, You consent to the processing of data by Google in the manner described in Google's Privacy Policy (<https://www.google.com/policies/privacy/>).

We may also need to share Your personal information in the following situations:

- **Business Transfers.** We may share or transfer Your information in connection with or during negotiation of, any merger, sale of company assets, financing or acquisition of all or a portion of our business to another company.

- When we use Google Maps Platform APIs. We may share Your information with certain Google Maps Platform APIs. To find out more about Google's Privacy Policy, please refer to this link <https://www.google.com/policies/privacy/>.
- Affiliates. We may share Your information with our affiliates, in which case we will require those affiliates to honour this privacy policy. Affiliates include our parent company and any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.

No member of Sonata Software accepts any responsibility or liability whatsoever for, or in respect of, the compliance of any other person or entity (including, without limitation, any Content Provider) with the privacy laws in force in any jurisdiction as may be amended from time to time.

## **Cookies and other tracking technologies**

We use cookies and similar tracking technologies (like local storage) to access or store information. Specific information about how we use such technologies and how You can refuse certain cookies is set out in our [Cookie Notice](#).

## **Is Your Information transferred internationally?**

We may transfer, store and process Your information in countries other than Your own.

Our servers are located in Australia. If You are accessing KODO form outside Australia, please be aware that Your information may be transferred to, stored and processed by us in our facilities in Australia and by those 3<sup>rd</sup> parties with whom we may share Your personal information, in other countries.

## **Retention**

We will keep Your personal information for as long as it is necessary for the purpose set out in this privacy notice, unless a longer retention period is required or permitted by law.

## **Security**

We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal information we process. However despite our safeguards and efforts to secure Your information, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal or modify Your information. Although we will do our best to protect Your personal information, transmission of personal information to and from KODO is at Your own risk. You should only access KODO within a secure environment.

## **What are Your privacy rights?**

You can stop all collection of information easily by uninstalling KODO (where it is an app application) or discontinuing the user of KODO (where it is a browser application).

In some regions (like the European Economic Area and United Kingdom), You have certain rights under applicable data protection laws. These may include the right to request access to the personal information we collect from You, change that information, or delete it.

We will consider and act upon any request in accordance with applicable data protection laws.

## **Children**

We do not use KODO to knowingly solicit data from or market to children under the age of 18. If a parent/guardian becomes aware that their child has provided information without their consent, they should contact us at [privacy@sonata-software.com](mailto:privacy@sonata-software.com). We will delete such information from our files within a reasonable time.

## **Changes**

This privacy policy may be updated from time to time for any reason. You are advised to consult this privacy policy regularly for any changes, as continued use is deemed approval of all changes.

## **Your Consent**

By using KODO, You are consenting to our processing of Your information as set forth in this Privacy Policy. "Processing," means using cookies on a computer/hand held device or using/touching information in any way, including, but not limited to, collecting, storing, deleting, using, combining and disclosing information. All processing activities, other than some 3rd party services, take place in Australia under Australian privacy standards.

## **Contact us**

If You have any questions regarding privacy while using KODO please contact us via email at [privacy@sonata-software.com](mailto:privacy@sonata-software.com).

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