

## PRIVACY POLICY

This Privacy Policy sets out how Sweet & Chilli Staffing Pty Ltd (ACN 614 686 403) (“we”, “our” or “us”) collects, stores, uses and discloses personal information via the Appbassador software application (“App”). This policy is intended to comply with the Privacy Act 1988 (Cth), including the Australian Privacy Principles (APPs), and applies to all users of the App.

By accessing and using the App, you consent to the practices outlined in this Privacy Policy.

### 1. ABOUT THE APP

The Appbassador App is a proprietary performance and reporting tool developed by Sweet & Chilli Staffing Pty Ltd. The App is offered as part of our services to Diageo, enabling brand ambassadors to input performance data, which is then accessible for review and reporting by Diageo and Sweet & Chilli administrators. The App is hosted on Heroku, a cloud-based platform operated by Salesforce.

### 2. WHAT INFORMATION WE COLLECT

We collect limited personal information through the App, including: - Full name - Email address - Performance and sales data entered by authorised users

This information is provided voluntarily and directly by brand ambassadors and used solely for business and reporting purposes.

### 3. HOW WE USE YOUR INFORMATION

We use personal information to: - Log and monitor ambassador sales performance - Generate reports for internal business purposes and for Diageo - Improve and assess our services and activations - Ensure compliance with our service agreement and legal obligations

We will not use personal information for any other purpose without consent unless required by law.

### 4. WHO HAS ACCESS TO YOUR INFORMATION

Access to the App and its data is limited to the following parties: - **Brand Ambassadors** – who input their own performance data - **Diageo** – view-only access with ability to generate reports - **Sweet & Chilli** – full admin access for operations and oversight

We do not share personal information with external third parties. Data is not used for advertising, marketing, or sold to other organisations.

## **5. DATA STORAGE & INTERNATIONAL TRANSFER**

All data is hosted on Heroku's cloud infrastructure. Although Heroku's servers may be located outside of Australia (such as the United States or European Union), we take reasonable steps to ensure all personal data is protected under the APPs and equivalent standards.

We rely on Salesforce's privacy framework and internationally recognised security certifications to safeguard the data collected and stored.

## **6. SECURITY MEASURES**

We implement appropriate technical and organisational measures to secure personal data, including: - Unique login credentials for each user - Role-based access permissions - Secure, encrypted (HTTPS) transmission of all data - Administrator-only data modification rights - Regular audits and monitoring

Despite our efforts, no method of data transmission over the internet is 100% secure. Users must take care to keep login credentials confidential.

## **7. DATA RETENTION**

Sales activity data may be retained for analysis and performance reporting, even after a user ceases participation. However, we will de-identify or permanently delete personal identifiers (such as name and email address) 18 months after the user's last activity, unless legal or contractual obligations require longer retention.

Where data is no longer necessary for business or legal purposes, we will securely destroy or anonymise it.

## **8. ACCESSING, CORRECTING OR DELETING DATA**

You may contact us at any time to: - Request access to the personal information we hold about you - Ask us to correct inaccurate or outdated information - Request deletion of your contact details (sales data will be anonymised and retained)

As the App does not currently include user-facing privacy settings, all such requests must be made directly to Sweet & Chilli (see contact details below).

## **9. NOTIFIABLE DATA BREACHES**

If we suspect a data breach that could result in serious harm, we will investigate and assess the incident promptly.

Where required under the Privacy Act, we will notify affected individuals and the Office of the Australian Information Commissioner (OAIC) and outline the steps being taken in response.

## **10. COOKIES AND USAGE TRACKING**

The App itself does not use cookies or tracking technologies. However, Heroku as the hosting platform may use automated server logs or technical diagnostics in accordance with its own policies. Please refer to [Heroku's Privacy Policy](#) for further information.

## **11. THIRD PARTY SERVICES**

No third-party systems, plugins or data processors (beyond Heroku/Salesforce) are used in connection with the App. Your data is not shared with external vendors, marketers or analytics platforms.

Where necessary, internal Sweet & Chilli staff in different regions may access data solely for operational or support purposes.

## **12. CHILDREN'S PRIVACY**

The App is intended for use only by authorised adult personnel. We do not knowingly collect or store information from individuals under the age of 18. If we become aware that we have inadvertently collected such information, we will delete it as soon as reasonably practicable.

## **13. CONTACT US**

If you have any questions about this policy or how your data is handled, please contact:

**Privacy Officer**

Sweet & Chilli Staffing Pty Ltd  
862/874 Elizabeth Street  
Waterloo NSW 2017  
Email: [Insert Email Address]

## **14. CHANGES TO THIS POLICY**

We may update this policy from time to time. Any significant changes will be communicated directly through the App.

Your continued use of the App following any updates constitutes your acceptance of the revised Privacy Policy.

## **15. COMPLAINTS**

If you believe your privacy rights have been breached, please reach out to us first so we can address your concern. If you're not satisfied with our response, you may lodge a complaint with the Office of the Australian Information Commissioner:

Website: [www.oaic.gov.au](http://www.oaic.gov.au)

Phone: 1300 363 992

Post: GPO Box 5218, Sydney NSW 2001