

MYSTERY SHOPPER PRIVACY POLICY

This privacy policy (hereinafter: **Policy**) is provided to you by GAPbuster Worldwide Pty, Ltd ("GBW", "we", "us"), located in Australia, and is applicable to the processing of personal data of EU-based individuals. Personal data, or personal information, means any information about an identified or identifiable individual. Data that cannot be traced back to a person (anonymous data) is not included.

GBW qualifies as the 'controller' in terms of the EU General Data Protection Regulation (**GDPR**) and we collect your personal data when you visit the GBW website [<https://kodohub.gbw.solutions/#/login> OR <http://xec.gbw.solutions/>], when you perform assignments and when you apply for or access your account as a mystery shopper, as well as when you engage with us in the context of the provision of our services to you or your company.

Please read this Policy carefully to understand how we handle your personal information.

WHAT PERSONAL DATA DO WE COLLECT?

GBW collects the following information about you:

- your name, age/date of birth and gender;
- your contact details: postal address including billing and delivery addresses, telephone numbers (including mobile numbers) and e-mail address;
- your user name and password(s) for your account on the GBW website;
- your bank account number (IBAN) or PayPal details;
- personal data included in your correspondence and communications with GBW;
- Information obtained through our use of cookies (IP addresses and device information);
- your received payments history;
- the results and outcomes of your mystery shopper activities (including evaluation, scoring and error history);
- demographic information to provide you with opportunities in your area; and
- any information that you voluntarily provide to us.

Most of the above personal data is collected directly from you, for example when you set up an on-line account on our websites, or send an email to our contractor services team. Some limited personal data is collected indirectly, for example your IP address and information about your device, which is collected through our use of cookies.

If you fail to provide certain requested information which is necessary for us to be able to consider your application or enter into a contract with you, we will not be able to process your application successfully, or enter into a contract with you.

AUTOMATED DECISION MAKING & PROFILING

Your personal information will not be subject to automated decision making and profiling within

the meaning of the GDPR. We do ask you to answer certain onboarding questions during your registration process, in order to establish eligibility for respective projects within GBW and to mitigate any potential conflict of interest. This process is done automatically, but always with human involvement.

HOW WE USE YOUR DATA

GBW uses your personal data:

- to onboard you as a mystery shopper;
- to manage your registered account(s) that you hold with us;
- to verify your identity (only through the use of cookies);
- for security purposes, including crime and fraud prevention, and the investigation, detection and prosecution thereof;
- with your agreement, to contact you via phone and electronically regarding potential jobs and scheduled jobs in your area;
- to enable GBW to manage contractor service interactions with you, to ensure timely payment for your work and to communicate with you in relation to the mystery shopper activities you perform for us;
- to conduct statistical analysis for our legitimate interest; and
- to ascertain eligibility for jobs.

More specific information about the types of personal data that we process for the above listed purposes, can be found in Appendix 1, as attached to this Policy.

HOW WE PROTECT YOUR DATA

Our controls

GBW is committed to keeping your personal data safe and secure.

Our security measures include: -

- encryption of data;
- regular scenario planning and crisis management exercises to ensure we are ready to respond to cyber security attacks and data security incidents;
- penetration testing of systems;
- security controls which protect the entire GBW IT infrastructure from external attack and unauthorised access;
- internal policies setting out our data security approach and training for employees; and
- we will wherever possible anonymise the data to ensure it can't be used to identify an individual.

WHAT YOU CAN DO TO HELP PROTECT YOUR DATA

GBW will never ask you to confirm any bank account details via email. If you receive an email claiming to be from GBW asking you to do so, please ignore it and do not respond. When in doubt, please always reach out to us first for confirmation that we are indeed the sender of the email.

If you are using a computing device in a public location, we recommend that you always log out and close the website browser when you complete an online session.

In addition, we recommend that you take the following security measures to enhance your online safety both in relation to GBW and more generally: -

- keep your account passwords private. Remember, anybody who knows your password may access your account;
- when creating a password, use at least 8 characters. A combination of letters and numbers is best. Do not use dictionary words, your name, email address, or other personal data that can be easily obtained. We also recommend that you frequently change your password. You can do this accessing your account, clicking 'your account', clicking 'your data' and selecting 'change password';
- avoid using the same password for multiple online accounts.

YOUR RIGHTS

Under the GDPR, you have the following rights in relation to the personal data we process about you:

- the right to ask what personal data we hold about you (also called the 'right of access' to your personal data) at any time, free of charge.
However, we may charge a 'reasonable fee' when a request is manifestly unfounded, or excessive;
- the right to ask us to rectify, update and correct any out-of-date or incorrect personal data that we hold about you free of charge; and

- the right to ask us to erase your personal data (your 'right to be forgotten');
- the right to ask us to restrict the processing of your personal data;
- (as set out above) the right to opt out of any marketing communications that we send you;
- under circumstances, the right to request that your personal data be provided to you or a third party in a “structured, commonly-used and machine-readable format” ('right to data portability');
- object to the processing of your personal data by us;
- the right not to be subject to automated decision making and profiling;

If you wish to exercise any of the above rights, please contact us using the contact details set out below.

LEGAL BASIS FOR GBW PROCESSING CONTRACTOR PERSONAL DATA

GENERAL

GBW collects and uses your personal data because it is necessary for:

- the pursuit of our legitimate interests (as set out below);
- the purposes of complying with our duties and exercising our rights under a contract with you; or
- complying with our legal obligations.

In general, we only rely on consent as a legal basis for processing in relation to sending direct marketing communications to contractors via email or text message and in relation to certain types of cookies on our website.

More specific information about the types of personal data that we process based on these legal grounds, can be found in Appendix 1, as attached to this Policy.

You **have the right to withdraw consent at any time**, either in the same way you consented, by contacting us via the 'Contact Information' provided below or via our Shopper Enquiry Line System (as further explained in the next paragraph). Where consent is the only legal basis for processing, we will cease to process data after consent is withdrawn. The withdrawal of your consent does not affect the lawfulness of the processing operations that we carried out before the withdrawal.

WHERE DO I REQUEST MY PERSONAL DATA AND/OR WITHDRAW MY CONSENT?

Simply log into our Shopper Enquiry Line System and select the category 'Personal Data' under 'New Enquiry', after which, select the relevant sub category.

<http://xec.gbw.solutions/XEEnquiry/NewEnquiry.aspx>
<https://kodohub.gbw.solutions/#/newenquiry>

We aim to provide you with the requested information without delay and at the latest within one month of receipt.

GBW is able to extend this one month period by a further two months where requests are complex or numerous. If this is the case, we must inform you within one month of the receipt of the request and explain why the extension is necessary.

OUR LEGITIMATE INTERESTS

Where we process your personal data on the legal ground 'legitimate interest', this shall include one or more of the following interests:

- conducting our general business activities and for the effective management of our business;
- protecting our rights, property and business;
- protecting our contractors, employees and other individuals and maintaining their safety, health and welfare;
- understanding our contractors' preferences and needs;
- improving existing services and developing new products and services;
- complying with our legal and regulatory obligations in Australia;
- preventing, investigating and detecting crime, fraud, illegal or anti-social behaviour and prosecuting offenders, including working with law enforcement agencies;
- handling contractor contacts, queries, complaints or disputes and to be able to ensure an efficient application process;
- initiating and/or responding to claims and complaints;
- carrying out marketing and sales related activities;
- effectively handling any legal claims or regulatory enforcement actions taken against GBW;
- investigating and/or engaging in a (proposed) sale, merger, acquisition or consolidation or a disposal of assets or business activities; and
- fulfilling our duties to our contractors, colleagues, shareholders and other stakeholders.

COOKIES

Like most websites, GBW websites use cookies to collect information. Cookies are small data files which are placed on your computer or other devices (such as smart 'phones or 'tablets') as you browse this website. They are used to 'remember' when your computer or device accesses our websites. Cookies are essential for the effective operation of our websites and to help you schedule your jobs with us online. More information about the cookies, can be found via [\[https://gbw.solutions/en/privacy#anchorCookies\]](https://gbw.solutions/en/privacy#anchorCookies).

HOW ARE COOKIES MANAGED?

The cookies stored on your computer or other devices when you access our websites are designed by:

- GBW, or on behalf of GBW, and are necessary to enable you to select jobs on our website;
- third parties who participate with us in marketing programmes; and

WHAT ARE COOKIES USED FOR?

The main purposes for which cookies are used are: -

- For technical purposes essential to effective fraud prevention
- Track the users, so GBW can apply rotation rules and follow client expectations.
 - o Mainly used for Local storage of surveys (Reference to cookies)
- Track Cookies for Shopper Quality purposes to avoid Fraudulent activities
- Google Analytics tracks cookies for our users.

CONTACT INFORMATION

If you have any questions about how GBW uses your personal data that are not answered here, or if you want to exercise your rights regarding your personal data, please contact us by any of the following means:

- email: Contactus@gbw.solutions
- phone us on: +61 3 9867 3477;
- write to us at: GBW, Lvl 4, 99 Queenbridge Street, South Melbourne, Victoria 3006, Australia

You have the right to lodge a complaint about the way we process your personal data with your local supervisory authority, such as the Information Commissioner's Office in the UK, or the Dutch Data Protection Authority in the Netherlands. Further information, including contact details, is available at <http://gbw.solutions/>

SHARING DATA WITH THIRD PARTIES

GBW will not disclose your personal data to any third party, except as set out below. We will never sell or rent personal data to other organisations for marketing purposes.

We share your data with:

- governmental bodies, regulators, supervisory authorities, law enforcement agencies, courts/tribunals and insurers where we are required to do so (e.g. upon their legally binding request);
- third party service providers, banks, payment service providers and hosting providers;
- other parties (including legal advisors, attorneys, consultants and auditors) when necessary: (i) to comply with our legal obligations, (ii) to exercise our legal rights (for example in court cases), (iii) for the prevention, detection, investigation of crime or prosecution of offenders; and/or (iv) for the protection of our employees and contractors.

INTERNATIONAL TRANSFERS

To deliver products and services to you, it is sometimes necessary for GBW to share your data with parties located outside of the European Economic Area (**EEA**). This will typically occur when service providers are located outside the EEA. These transfers are subject to special rules under applicable data protection laws.

If this happens, we will ensure that your personal data are adequately protected and that the transfer will be compliant with applicable data protection laws. Our standard practice is to perform transfer impact assessments and to enter into 'standard data protection clauses' with the recipients of your data, which clauses have been approved by the European Commission for such transfers. Those clauses can be accessed [here](#).

In addition, we are committed to ensure that (where required) our transfers comply with any additional requirements or guidelines from the European Court of Justice, applicable data protection laws and/or guidance of supervisory authorities in relation to the transfer of personal data.

HOW LONG DO WE KEEP YOUR DATA?

We will not retain your data for longer than necessary for the purposes set out in this Policy. Different retention periods apply for different types of data, however the longest we will normally hold any personal data is 7 years. For more specific information about the retention terms that we apply, we kindly refer to Appendix 1, as attached to this Policy.

CHANGES TO THIS POLICY

We may change this Policy from time to time. If the changes are substantial, we will always actively inform you about them and provide you with a new version of the Policy. The date on which the last revisions were made is included at the bottom of this Policy.

Last updated: December 2022.

APPENDIX 1 – PROCESSING ACTIVITIES

The situations in which we will process your personal data are listed more specifically below.

Purpose	Personal data	Legal basis	Retention period
<i>If you visit and use the website and/or have an account with us</i>			
To measure and improve interest in our website, to customise your user experience according to your behaviour and interests.	<ul style="list-style-type: none"> Data about your device and browser type IP address Data your use of the website, web pages viewed, hyperlinks you clicked on and websites you visited before coming to our website 	Necessary for our legitimate interests (to keep the website up-to-date and relevant) and/or based on your consent to the placement of cookies.	For the duration of the cookie with a maximum period of 6 months or, if the processing is based on your consent, until the moment you withdraw your consent (whichever is earlier).
To manage our website, identify problems, to protect our business, to solve problems and to prevent potentially prohibited or illegal activities (for example by checking the amount of devices on which you log-in or register with us).	<ul style="list-style-type: none"> Data about your device and browser type IP address Data your use of the Website, web pages viewed, hyperlinks you clicked on and websites you visited before coming to our Website Account information, such as username and password 	Necessary for our legitimate interests (for running our business, providing IT services, ensuring network security and to prevent fraud and other prohibited activities).	<p>For the duration of the cookie with a maximum period of 6 months or, if the processing is based on your consent, until the moment you withdraw your consent (whichever is earlier).</p> <p>When you have an account with us, we will retain the data for the duration of your account; until the moment you delete your account or for a period of [2 years] since your latest login in to the Platform.</p> <p>Longer retention is only possible if necessary in connection with legal proceedings or legal obligations.</p>
<i>When performing assignments and/or interacting with us (e.g. through your account) as a mystery shopper</i>			
To connect you with our client(s) and provide you with new mystery shopping assignments.	<ul style="list-style-type: none"> your name, age/date of birth and gender your contact details your password(s) your account or PayPal details your correspondence and communications with GBW source tracking for legitimate verification purposes your payment history 	Necessary for the performance of our contract with you or necessary to for our legitimate interest (business improvement and continuity purposes).	For the duration of the contract with you and/or the period you have an account with us, and [2 years] after termination of the contract and/or account.

	<ul style="list-style-type: none"> • evaluation, scoring and error history • demographic information • any information that you voluntarily provide to us 		
For administrative purposes in relation to our mystery shopping services, to pay fees we owe to you, your to administer your account with us and to provide you with access to the website and the mystery shopping portal and to check your identity for this purpose.	<ul style="list-style-type: none"> • your name, age/date of birth and gender • your contact details • your password(s) • your account or PayPal details • your correspondence and communications with GBW • source tracking for legitimate verification purposes • your payment history • evaluation, scoring and error history • demographic information • any information that you voluntarily provide to us 	Necessary for the performance of our contract with you or necessary to comply with our legal obligations (administrative obligations).	For the duration of the contract with you and/or the period you have an account with us, and [2 years] after termination of the contract and/or account. If we are legally obliged to retain the data to comply with our legal obligations, for a maximum period of [7 years] after the end of the contract with you.
To manage our relationship with you and to communicate with you regarding the services, your questions or comments and to notify you about our changes to our Policy or applicable terms.	<ul style="list-style-type: none"> • your name, age/date of birth and gender • your contact details • your correspondence and communications with GBW • evaluation, scoring and error history • any information that you voluntarily provide to us 	Necessary for our legitimate interests to protect our business and rights or necessary to comply with our legal obligations (e.g. to cooperate with law enforcement and regulators).	For the duration of the contract with you and/or the period you have an account with us, and [2 years] after termination of the contract and/or account, unless a longer retention period is required to comply with regulatory requirement or defend or prosecute legal claims.
To notify you about promotions and special offers, as well as the services we offer that may be of interest to you.	<ul style="list-style-type: none"> • your name, age/date of birth and gender • your contact details • your correspondence and communications with GBW • any information that you voluntarily provide to us 	Necessary for our legitimate interests (i.e. to be able to carry out marketing-related activities) or your consent for receiving marketing messages.	For the duration of the contract with you and/or the period you have an account with us, and [2 years] after termination of the contract and/or account. Where the processing is based on your consent, until the moment you withdraw consent (whichever is earlier).
<i>If you interact with us as an employee on behalf of one of our clients (requesting mystery shopping services)</i>			
To manage our relationship with you and/or your employer	<ul style="list-style-type: none"> • your name, age/date of birth and gender • your contact details 	Necessary for our legitimate interests to protect our	For the duration of [2 years] after the end of our contract

<p>and to communicate with you regarding the services, your questions or comments and to notify you about our changes to our Policy or applicable terms.</p>	<ul style="list-style-type: none"> • your correspondence and communications with GBW • evaluation, scoring and error history • any information that you voluntarily provide to us 	<p>business and rights or necessary to comply with our legal obligations (e.g. to cooperate with law enforcement and regulators).</p>	<p>with you / your employer, unless a longer retention period is required to comply with regulatory requirement or defend or prosecute legal claims.</p>
<p>For administrative purposes in relation to our services, to administer your account with us and to provide you with access to your account.</p>	<ul style="list-style-type: none"> • your name, age/date of birth and gender • your contact details • your password(s) • your account or PayPal details • your correspondence and communications with GBW • any information that you voluntarily provide to us 	<p>Necessary for the performance of our contract with you / your employer, or necessary to comply with our legal obligations (administrative obligations).</p>	<p>For the duration of the contract with you and/or the period you have an account with us, and [2 years] after termination of the contract and/or account.</p> <p>If we are legally obliged to retain the data to comply with our legal obligations, for a maximum period of [7 years] after the end of the contract with you.</p>
<p>To notify you about promotions and special offers, as well as the services we offer that may be of interest to you.</p>	<ul style="list-style-type: none"> • your name, age/date of birth and gender • your contact details • your correspondence and communications with GBW • evaluation, scoring and error history 	<p>Necessary for our legitimate interests (i.e. to be able to carry out marketing-related activities) or your consent for receiving marketing messages.</p>	<p>For the duration of the contract with you and/or the period you have an account with us, and [2 years] after termination of the contract and/or account.</p> <p>Where the processing is based on your consent, until the moment you withdraw consent (whichever is earlier).</p>