



PRIVACY POLICY

XS WORLD

ELEVEN11 TECH PTY LTD

AUSTRALIA

PRIVACY POLICY

Purpose

This is the Privacy Policy for ELEVEN11 Tech Pty Ltd ACN 663 358 870 trading as XS World (**XS World**). This Privacy Policy applies to XS World's websites, and online services that may run on smart phones, tablets, and other mobile devices ("apps").

XS World is committed to complying with the Australian Privacy Principles as contained in the *Privacy Act 1988* (Cth). This Privacy Policy is intended to provide a clear and concise summary of XS World's approach to the handling of personal information in accordance with the Australian Privacy Principles.

This privacy policy appears on our website and our apps, and may be provided upon request, free of charge.

Consent

By using this website or any products (including apps) from XS World, you will be deemed to have consented to XS World handling your data in accordance with this Privacy Policy.

What is personal information?

Under the *Privacy Act 1988* (Cth) personal information is defined to mean information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not.

Personal information can include sensitive information. Sensitive information is defined as information or an opinion about a person's race, ethnic origin, political opinions, membership of political associations and trade associations, religious or philosophical beliefs, sexual orientation or practices, criminal record, health information, genetic information about an individual that is not otherwise health information, biometric information that is used for the purpose of automated biometric verification or biometric identification and biometric templates.

Personal information that we collect and hold

XS World collects, holds and uses personal information in order to provide and improve its products and services. If we do not collect personal information, or the information provided is incomplete or inaccurate, we may not be able to deliver products or provide our services, or our services may be compromised.

We generally collect personal information in the following ways:

- information that you give to us (for example through our website, via app, via email or via telephone);
- information that we get from your use of our website or apps;
- information we receive from third party service providers, for example our payment gateway service provider;
- publicly available sources;
- using cookies and similar technologies.

The types of personal information that we can collect and hold include:

- name;
- contact details including address, email address and telephone number;
- order information including details of all in-app purchases;
- payment details to complete payment which may include details of credit card, debit card or any other method of payment;
- information that you provide when you register or create an account with us;
- records of any XS World competitions or promotions you enter;
- your location.
- places you visit;
- photographs;
- other people who are your contacts;

- messages sent within the apps;
- information from third party services to enable XS World to monitor and analyse web and app traffic and can be used to keep track of website and app user behaviour.

Location Information

We may collect information about your current location, where you live, the places you go, and businesses and people you are nearby.

Unless you opt-out on the app, we may also collect information about your precise location using methods that include, but are not limited to, GPS, wireless networks, Bluetooth, cell towers, Wi-Fi access points, and other sensors such as gyroscopes, accelerometers, and compasses. We may share this information with third parties. If you do not opt-out of these features, when you access the XS World app we may collect specific information about your geographic location including longitude and latitude and we may save your device's coordinates to enable us to offer you certain features. This information helps us to identify your physical location and we may use this information to personalise the app and make it easier for you to interact with other users of the app, by enabling the information to be displayed and shared with other users.

To-opt out of this feature, you will need to disable your location services on your device.

Sharing of information with other XS World users

When you choose to use our apps, you give your consent for us to share your information with other users. We may share the following information with other users:

- public information on your profile such as username, profile image, etc.;
- your recent location(s);
- other users in common, in the same location, or nearby;
- your device operating system, to help you receive messages and other content in optimal viewing format;
- if enabled, your real time location (only for the duration you choose to share it); and
- content which you post or share via the apps.

Cookies

We may use cookies. A cookie is a small text file which may be placed on your Internet browser and which we access each time you visit a website. Without limitation, we may use cookies to:

- help the website to function correctly or to improve the usability, content or user experience of the website;
- monitor our website's performance;
- for security;
- build up a picture of the websites, products and services you prefer, so that we can then provide you with a personalised experience of our website and provide you with recommendations, advertisements and information of interest to you;
- place advertisements for our products on other external sites;
- monitor how our marketing is performing.

Most browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies. You may delete or decline cookies by changing your browser settings. (Click "Help" in the toolbar of most browsers for instructions or review the cookie management guide produced by the Interactive

Advertising Bureau – www.allaboutcookies.org) If you do so, some of the features and services of the site may not function properly.

Server log files

The website provider automatically collects and stores information that your browser automatically transmits to us in "server log files".

These are:

- browser type and browser version;
- operating system used;
- referrer URL;
- host name of the accessing computer;
- time of the server request;
- IP address.

This data will not be combined with data from other sources.

Google Analytics

We use Google Analytics to collect information about the use of our website. Google Analytics collects information about your visit to our website but does not collect your personal information.

Google Analytics uses so-called "cookies". These are text files that are stored on your computer and that allow an analysis of the use of the website by you. The information generated by the cookie about your use of this website is usually transmitted to a Google server in the United States of America and stored there.

IP anonymisation

We may activate the IP anonymisation feature on our website. Your IP address may be shortened by Google. In exceptional cases the full IP address may be sent to a Google server in the United States of America and shortened there. Google may use this information on behalf of the operator of our website to evaluate your use of the website, to compile reports on website activity, and to provide other services regarding website activity and Internet usage. The IP address is transmitted by your browser as part of Google Analytics.

Browser plugin

You can prevent these cookies being stored by selecting the appropriate settings in your browser. However, we wish to point out that doing so may mean you will not be able to enjoy the full functionality of our website. You can also prevent the data generated by cookies about your use of our website (including your IP address) from being passed to Google, and the processing of this data by Google, by downloading and installing the browser plugin available at: <https://tools.google.com/dlpage/gaoptout?hl=en>.

Outsourced data processing

We may enter into an agreement(s) with Google or others for the outsourcing of our data processing.

Demographic data collection by Google Analytics

Our website uses Google Analytics' demographic features. This allows reports to be generated containing statements about the age, gender, and interests of site visitors. This data comes from interest-based advertising from Google and third-party visitor data. The collected data cannot be attributed to any specific individual person. You can disable this feature at any time by adjusting the ads settings in your Google account or you can forbid the collection of your data by Google Analytics. For instructions on disabling Google Analytics, see: <https://support.google.com/analytics/answer/9019185?hl=en#disable-app&zippy=%2Cin-this-article>

Disclosure of your personal information

XS World never sells any sensitive personal information.

XS World may disclose your personal information to:

- our related entities;
- personnel involved with the operation of our apps and our websites including IT, administration, sales, marketing and system administration staff;
- lawyers and other professional advisers;
- our service providers and contractors including mail carriers, couriers, hosting providers, IT companies and communications agencies;
- our agents, associates and business partners;
- any entity to which we are required or authorised by or under law to disclose such information;
- to prospective or actual buyers in the event we sell our business or assets;
- other third parties.

By continuing to use our website or our app(s) you expressly consent to XS World disclosing your personal information in the manner outlined above.

Facebook plugins (Like & Share buttons)

Our website and apps include plugins for the social network Facebook operated by Facebook Inc., 1 Hacker Way, Menlo Park, California 94025, USA.

The Facebook plugins can be recognized by the Facebook logo or the Like button on our site. For an overview of Facebook plugins, see <https://developers.facebook.com/docs/plugins/>.

When you visit our website, a direct connection between your browser and the Facebook server is established via the plugin. This enables Facebook to receive the information that you have visited our website from your IP address. If you click on the Facebook "Like button" while you are logged into your Facebook account, you can link the content of our website to your Facebook profile. This allows Facebook to associate visits to our website with your user account. Please note that, as the operator of our website, we have no knowledge of the content of the data transmitted to Facebook or of how Facebook uses this data. For more information, please see Facebook's privacy policy at <https://de-de.facebook.com/policy.php>.

If you do not want Facebook to associate your visit to our website with your Facebook account, please log out of your Facebook account.

Twitter plugin

Functions of the Twitter service have been integrated into our website and app(s). These features are offered by Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA. When you use Twitter and the "Retweet" function, the websites you visit are connected to your Twitter account and made known to other users. In doing so, data will also be transferred to Twitter. We would like to point out that, as the provider of our website and apps, we have no knowledge of the content of the data transmitted or how it will be used by Twitter. For more information on Twitter's privacy policy, please go to <https://twitter.com/privacy>.

Your privacy preferences with Twitter can be modified in your account settings at <https://twitter.com/account/settings>

Use of your personal information

XS World uses personal information for the purpose of providing its products and associated services including facilitation of payment and in-app functions.

Personal information is also used for the following purposes and services:

- marketing and advertising;
- contacting you or communicating with you;
- to understand more about you, so that we can provide better products and services;
- to improve our products and services;
- displaying content from external platforms;
- heat mapping and session recording;
- interaction with external social networks and platforms;
- managing support and contact requests;
- analytics;
- content commenting and moderation;
- hosting and back-end infrastructure;
- managing contacts and sending messages;
- remarketing and behavioural targeting;
- to meet contractual obligations;
- internal record keeping, management and administration.

Marketing and advertising

XS World will never use or disclose any sensitive information for marketing or advertising purposes.

We may use and disclose your personal information (other than sensitive information) to provide you with information about products or services offered by XS World or other third-party companies or entities. You consent to receipt of direct marketing information including by email or SMS.

If at any time you do not wish to receive marketing communications from us or you do not want your personal information disclosed for marketing purposes, please contact our Privacy Officer and we will remove your details from our marketing database

Security

While we will take reasonable steps to protect the personal information that we hold from misuse, loss, unauthorised access, modification or disclosure, you should be aware that no system is completely secure against cyber-attack.

In addition, the open nature of the internet is such that information exchanged via the internet may be accessed and used by people other than those for whom the data is intended. Any information sent via the internet is sent at the sender's risk.

You should contact us immediately if you believe that there has been unauthorised access or disclosure with respect to any personal information that we hold about you.

When personal information that we collect is no longer required by XS World, we will destroy or de-identify that personal information unless we are required by law or a court/tribunal to retain the personal information. We may retain personal information for so long as it is required for any of our business purposes, for the prevention of fraud, for insurance and governance purposes and in our IT back-up.

Disclosure Overseas

XS World is unlikely to disclose your personal information overseas to persons other than technical service providers and associated entities of XS World, however if we do so, it will be in accordance with the Australian Privacy Principles.

Our servers are located in Sydney and Mumbai.

We may have service providers and associated entities located in India and the United Arab Emirates.

You consent to any disclosure of your personal information by XS World overseas on the understanding that if the overseas recipient handles the personal information in breach of the Australian Privacy Principles, the entity will not be accountable under the *Privacy Act 1988* (Cth), and you will not be able to seek redress under the *Privacy Act 1988* (Cth). The overseas recipient may not be subject to privacy obligations or to any principles similar to the Australian Privacy Principles. Individuals may not be able to seek redress in some overseas jurisdictions, and overseas recipients may be subject to a foreign law that could compel the disclosure of personal information to a third party, such as an overseas authority.

De-identified data

You consent to XS World using and disclosing your de-identified data (data that no longer identifies you) for any purpose, including without limitation research, statistical analysis, product development, marketing and business planning and any other commercial purpose. We undertake technical measures to make sure that this data cannot be associated back to you.

Access and correction

Individuals can request access to their personal information held by XS World by sending a written request to our Privacy Officer. XS World does not impose a charge for making a request for access, however we may charge for reasonable administrative costs incurred in providing access.

You can ask our Privacy Officer to request or update your personal information. XS World does not impose any charge with respect to requests for correction or updates.

Before providing access to personal information, or correcting or updating personal information, XS World will require your identity to be confirmed.

Requests for access or correction may be refused upon the grounds contained in the *Privacy Act 1988* (Cth). If we refuse to provide access, or to correct or update personal information, XS World will provide you with reasons for the refusal. If we refuse to correct your personal information you have the right to associate with the information a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading. We will take such steps as are reasonable in the circumstances to associate that statement with all records we hold that contain the relevant information.

Notifiable data breaches

We will notify you and the Office of the Australian Information Commissioner about any data breach that is likely to result in serious harm to you. There are exceptions where notification is not required, for example where we have already taken appropriate remedial action that removes the risk of serious harm to any individuals.

Complaints

Privacy related complaints should be directed to our Privacy Officer in writing at the address below.

We will do our best to ensure that our investigation is completed, and a decision about your complaint is communicated to you, within 30 days of our being advised of the complaint. We will inform you if we need more time.

If you are dissatisfied with XS World's response, you can take your complaint to the Office of the Australian Information Commissioner:

Post GPO Box 5288
 Sydney NSW 2001

Phone 1300 363 992

Email enquiries@oaic.gov.au

XS World's Privacy Officer

XS World's Privacy Officer's contact details are:

Name: Xerxes Surty
Email: xerxes@xsworld.online
Address: Unit 12, 1st Floor, 420 Bagot Road Subiaco WA 6008

Effect of this Privacy Policy

This Privacy Policy does not create any rights or obligations that you can legally enforce beyond the rights and obligations provided by the Australian Privacy Principles.

Changes to this Privacy Policy

This policy may be amended from time to time. We will publish any updated versions of this policy on our website at www.xsworld.online. By continuing to use our website, apps or any XS World service, you will be deemed to have consented to any amended versions of this policy that are published on our website.

Last updated: 30 August 2023.