

1. Introduction

We are a Virtual Reality (VR) online training & assessment platform for adult students and educational professionals. People use our products and services to create and practice various potentially dangerous learning & assessment activities in a safe environment. Our Privacy Policy applies to any Member, Student, or Visitor to our services.

Our registered users (“Members, Students”) may share their professional identities, engage with others within our environments, exchange knowledge and professional insights, post and view relevant content, learn, and develop skills and be assessed for their competency. Content and non-private data on some of our services is viewable to non-members (“Visitors”).

Services

This Privacy Policy, including our Cookie Policy applies to your use of our services.

This Privacy Policy applies to VRCentre.com.au, VRCentre.au VRCentre-branded apps, VRCentre Learning and other VRCentre-related sites, apps, communications, and services (“services”), including off-site services.

Change

Changes to the Privacy Policy apply to your use of our services after the “effective date.”

VRCentre (“we” or “us”) can modify this Privacy Policy, and if we make material changes to it, we will provide notice through our services, or by other means, to provide you the opportunity to review the changes

IS YOUR ORGANISATION READY TO BRING THE WORKSITE INTO THE CLASSROOM?

before they become effective. If you object to any changes, you may close your account.

You acknowledge that your continued use of our services after we publish or send a notice about our changes to this Privacy Policy means that the collection, use and sharing of your personal data is subject to the updated Privacy Policy, as of its effective date.

2. 1. Data We Collect

Data You Provide To Us

You provide data to create an account with us. You can [access or delete your personal data](#) at any time.

Registration

To create an account, you may need to provide data including your name, email address and/or mobile number, and a password. If you registered for an extended service or have purchased a standalone app you will need to have provided payment (e.g., credit card) and billing information.

You create your VRCentre profile (a complete profile helps you get the most from our services).

Profile

You have choices about the information on your profile, such as your education, work experience, skills, photo, city or area and endorsements. You don't have to provide additional information on your

profile; however, profile information helps you to get more from our services. Please do not post or add personal data to your profile that you would not want to be publicly available.

Other data, such as by syncing your address book or calendar.

Posting and Uploading

We collect personal data from you when you provide, post or upload it to our services, such as when you fill out a form, complete an assessment, download or upload documents on our services.

We do not import your address book or receive or sync your contacts or calendars with our services. You don't have to post or upload personal data to complete any assessment.

1.2 Data From Others

Customers and partners may provide data to us.

Partners

We sometimes receive personal data (e.g., your job title and work email address) about you when you use the services of our customers and partners, such as schools, registered training organisations or employer.

1.3 Service Use

We log your visits and use of our services, including mobile apps.

We log usage data when you visit or otherwise use our services, including our sites, app and platform technology, such as when you view or click on content (e.g., learning video) or other media and documents (on or off our sites and apps), perform a search, install or update one of our mobile apps, complete tasks or assessments. We use log-ins, cookies, device information and internet protocol (“IP”) addresses to identify you and log your use.

1.4 Cookies and Similar Technologies

We collect data through cookies and similar technologies.

As further described in our Cookie Policy, we use cookies and similar technologies (e.g., pixels) to collect data (e.g., device IDs) to recognize you and your device(s) on, off and across different services and devices where you have engaged with our services.

1.5 Your Device and Location

We receive data through cookies and similar technologies

When you visit or leave our services (including some plugins and our cookies or similar technology on the sites of others), we receive the URL of both the site you came from and the one you go to and the time of your visit. We also get information about your network and device (e.g., IP address, proxy server, operating system, web browser and add-ons, device identifier and features, cookie IDs and/or ISP, or your mobile carrier). If you use our services from a mobile device, that device will send us data about your location based on your phone settings. We will ask you to opt-in before we use GPS or other tools to identify your precise location.

1.6 Messages

If you communicate through our services, we learn about that.

We collect information about you when you send, receive, or engage with messages in connection with our services. For example, if you use the chat the conversation is added to the recording of the assessment output files, when you submit an assessment a record of your communications is retained. We also use automatic scanning technology on messages to support and protect our site and to protect against plagiarism and cheating . For example, we use this technology to suggest possible responses to messages and to manage or block content that violates our User Agreement or Professional Community Policies from our services.

1.7 Workplace and School Provided Information

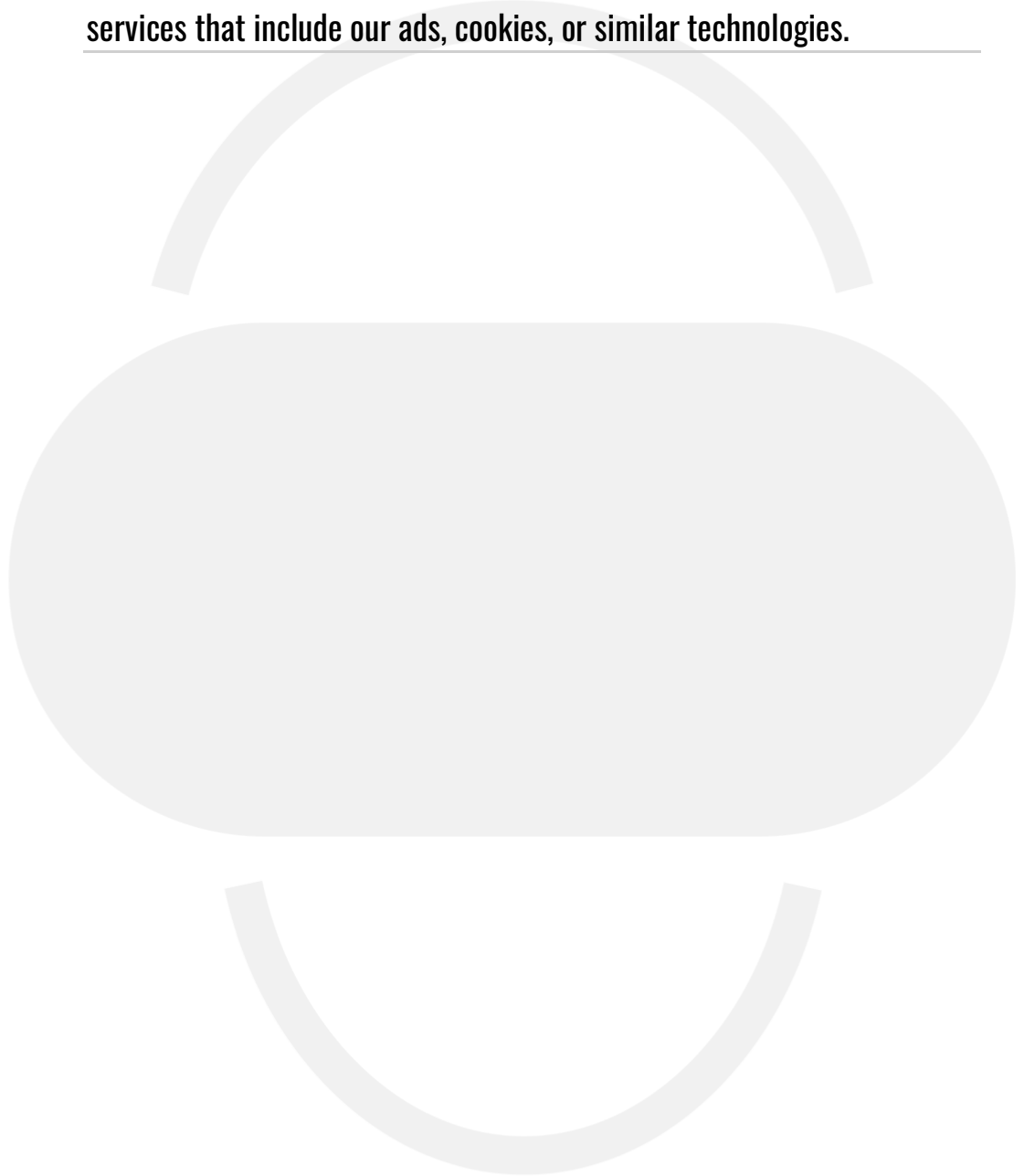
When your organization (e.g., employer or school) buys a service for you to use, they give us data about you.

Others buying our services for your use, such as your employer or your school, provide us with personal data about you and your eligibility to use the services that they purchase for use by their workers, students, or alumni. For example, we will get contact information for administrators and for authorizing users for access to our services or VR applications.

1.8 Sites and Services of Others

We may get data when you visit sites that include our ads, cookies or when you log-in to others' services with your VRCentre account.

We receive information about your visits and interaction with services provided by others when you log-in with VRCentre or visit others' services that include our ads, cookies, or similar technologies.



1.9 Other

We are always improving our services, which means we get new data and create new ways to use data.

Our services are dynamic, and we often introduce new features, which may require the collection of new information. If we collect materially different personal data or materially change how we collect, use, or share your data, we will notify you and may also modify this Privacy Policy.

Key Terms

3. 2. How We Use Your Data

We use your data to provide, support, personalize and develop our services.

How we use your personal data will depend on which services you use, how you use those services and the choices you make in your profile settings. We use the data that we have about you to provide and personalize our services, including with the help of automated systems and inferences we make, so that our services can be more relevant and useful to you and others.

2.1 Services

Our services help you get quality practical training and advance your knowledge.

We use your data to honour your settings and authorize access to our services.

2.2 Communications

We contact you from time to time. This may include product update notifications. We offer settings in your profile to control what messages you receive and how often you receive some types of messages.

We may contact you through email, mobile phone, notices posted on our websites or apps, and other ways through our services, including text messages and push notifications if enabled. We will send you messages about the availability of our services, security, or other service-related issues. We also send messages about how to use our services, network updates, and important reminders. You may change your communication preferences at any time. Please be aware that you cannot opt out of receiving service messages from us, including security and legal notices.

2.3 Marketing

We promote our services to you and others.

In addition to advertising our services, we use Members' data and content for invitations and communications promoting membership, network growth, and engagement of our services.

2.4 Developing Services and Research

We conduct research and develop of our services

Service Development

We use data, including public feedback, to conduct research and development for our services in order to provide you and others with a

better, more intuitive, and personalized experience, and engagement with our services.

Surveys

Polls and surveys are conducted by us through our services. You are not obligated to respond to polls or surveys, and you have choices about the information you provide. You may opt-out of survey invitations.

2.5 Customer Support

We use data to fix problems and help you.

We use data (which can include your communications) to investigate, respond to and resolve complaints and for Service issues (e.g., bugs).

2.6 Insights That Do Not Identify You

We use data to generate insights that do not identify you.

We use your data to produce and share insights that do not identify you. For example, we may use your data to generate statistics about our members, their profession or industry, to publish visitor demographics for a service or create demographic workforce insights.

2.7 Security and Investigations

We use data for security, fraud prevention and investigations.

We use your data (including your communications) for security purposes or to prevent or investigate possible fraud or other violations

of our User Agreement and/or attempts to harm our Members, Students, Visitors, or others.

Key Terms

4. 3. How We Share Information

3.1 Our Services

Any data that you include on your profile and any content you post or social action (e.g., likes, follows, comments, shares) you take on our services will be seen by others, consistent with your settings.

Profile

Your profile is fully visible to all Members and customers of our Services. Subject to your settings.

Posts, Likes, Follows, Comments, Messages

Our Services allow viewing and sharing information including through posts, likes, follows and comments.

- When you share an article or a post (e.g., an update, image, video or article) publicly it can be viewed by everyone and re-shared anywhere (subject to your settings). Members, Students, Visitors and others will be able to find and see your publicly shared content, including your name (and photo if you have provided one).
- In a group, posts are visible to others in the group. Your membership in groups is public and part of your profile, but you can change visibility in your settings.

- Any information you share through companies' or other organizations' pages on our Services will be viewable by it and others who visit those pages.
- When you follow a person or organization, you are visible to others and that "page owner" as a follower.
- We let senders know when you act on their message, subject to your settings where applicable.
- Subject to your settings, we let a Member know when you view their profile.
- When you like or re-share or comment on another's content (including ads), others will be able to view these "social actions" and associate it with you (e.g., your name, profile and photo if you provided it).

3.2 Communication Archival

Regulated Members may need to store communications outside of our Service.

Some Members, Students, Employers, need, for legal or professional compliance, to archive their communications and work activity, and will use services of others to provide these archival services. We enable archiving of messages by and to those Members outside of our Services.

3.3 Others' Services

You may not link your account with others' services so that they can look up your contacts' profiles, post your shares on such platforms, or enable you to start conversations with your connections on such platforms.

3.4 Related Services

We share your data across our different services and VRCentre affiliated entities.

We will share your personal data with our affiliates to provide and develop our services. We may combine information internally across the different services covered by this Privacy Policy to help our Services be more relevant and useful to you and others. For example, we may personalize your feed based on your learning history.

3.5 Service Providers

We may use others to help us with our Services.

We use others to help us provide our Services (e.g., maintenance, analysis, audit, payments, fraud detection, marketing, and development). They will have access to your information as reasonably necessary to perform these tasks on our behalf and are obligated not to disclose or use it for other purposes.

3.6 Legal Disclosures

We may need to share your data when we believe it's required by law or to help protect the rights and safety of you, us, or others.

It is possible that we will need to disclose information about you when required by law, subpoena, or other legal process or if we have a good faith belief that disclosure is reasonably necessary to (1) investigate, prevent or take action regarding suspected or actual illegal activities or to assist government enforcement agencies; (2) enforce our agreements with you; (3) investigate and defend ourselves against any third-party claims or allegations; (4) protect the security or integrity of our Services (such as by sharing with companies facing similar threats); or

(5) exercise or protect the rights and safety of VRCentre, our Members, personnel or others. We attempt to notify Members about legal demands for their personal data when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague or lack proper authority, but we do not promise to challenge every demand. To learn more, see our Data Request Guidelines and Transparency Report.

3.7 Change in Control or Sale

We may share your data when our business is sold to others, but it must continue to be used in accordance with this Privacy Policy.

We can also share your personal data as part of a sale, merger or change in control, or in preparation for any of these events. Any other entity which buys us, or part of our business will have the right to continue to use your data, but only in the manner set out in this Privacy Policy unless you agree otherwise.

5. 4. Your Choices & Obligations

4.1 Data Retention

We keep most of your personal data for as long as your account is open.

We generally retain your personal data as long as you keep your account open or as needed to provide you services. This includes data you or others provided to us, and data generated or inferred from your use of our services.

4.2 Rights to Access & Control your Personal Data

You can access or delete your personal data. You have many choices about how your data is collected, used, and shared.

We provide many choices about the collection, use and sharing of your data, from deleting or correcting data you include in your profile and controlling the visibility of your posts communication controls. We offer you settings to control and manage the personal data we have about you.

For personal data that we have about you, you can:

- **Delete Data:** You can ask us to erase or delete all or some of your personal data (e.g., if it is no longer necessary to provide services to you).
- **Change or Correct Data:** You can edit some of your personal data through your account. You can also ask us to change, update or fix your data in certain cases, particularly if it's inaccurate.
- **Object to, or Limit or Restrict, Use of Data:** You can ask us to stop using all or some of your personal data (e.g., if we have no legal right to keep using it) or to limit our use of it (e.g., if your personal data is inaccurate or unlawfully held).
- **Right to Access and/or Take Your Data:** You can ask us for a copy of your personal data and can ask for a copy of personal data you provided in machine readable form.

You may contact us using the following [contact information](#), and we will consider your request in accordance with applicable laws.

4.3 Account Closure

We keep some of your data even after you close your account.

If you choose to close your VRCentre account, your personal data will generally stop being visible to others on our services within 24 hours. We generally delete closed account information within 30 days of account closure, except as noted below.

We retain your personal data even after you have closed your account if reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse (e.g., if we have restricted your account for breach of our Professional Community Policies), enforce our User Agreement, or fulfill your request to "unsubscribe" from further messages from us. We will retain de-personalized information after your account has been closed.

Information you have shared with others (e.g., through chat, or group posts) will remain visible after you close your account or delete the information from your own profile or mailbox, and we do not control data that other Members have copied out of our Services. Groups content and ratings or review content associated with closed accounts will show an unknown user as the source. Your profile may continue to be displayed in the services of others (e.g., search engine results) until they refresh their cache.

6. 5. Other Important Information

5.1. Security

We monitor for and try to prevent security breaches. Please use the security features available through our services.

We implement security safeguards designed to protect your data, such as HTTPS. We regularly monitor our systems for possible vulnerabilities

and attacks. However, we cannot warrant the security of any information that you send us. There is no guarantee that data may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.

5.2. Cross-Border Data Transfers

We store and use your data outside your country.

We process data both inside and outside of Australia and rely on legally provided mechanisms to lawfully transfer data across borders. Countries where we process data may have laws which are different from, and potentially not as protective as, the laws of your own country.

5.3. Lawful Bases for Processing

We have lawful bases to collect, use and share data about you. You have choices about our use of your data. At any time, you can withdraw consent you have provided by going to settings.

We will only collect and process personal data about you where we have lawful bases. Lawful bases include consent (where you have given consent), contract (where processing is necessary for the performance of a contract with you (e.g., to deliver the VRCentre Services you have requested) and “legitimate interests.”

Where we rely on your consent to process personal data, you have the right to withdraw or decline your consent at any time and where we rely on legitimate interests, you have the right to object. If you have any questions about the lawful bases upon which we collect and use your personal data, please contact our Data Protection Officer

5.4. Direct Marketing

Our statements regarding direct marketing.

We currently do not share personal data with third parties for their direct marketing purposes without your permission.

5.5. Contact Information

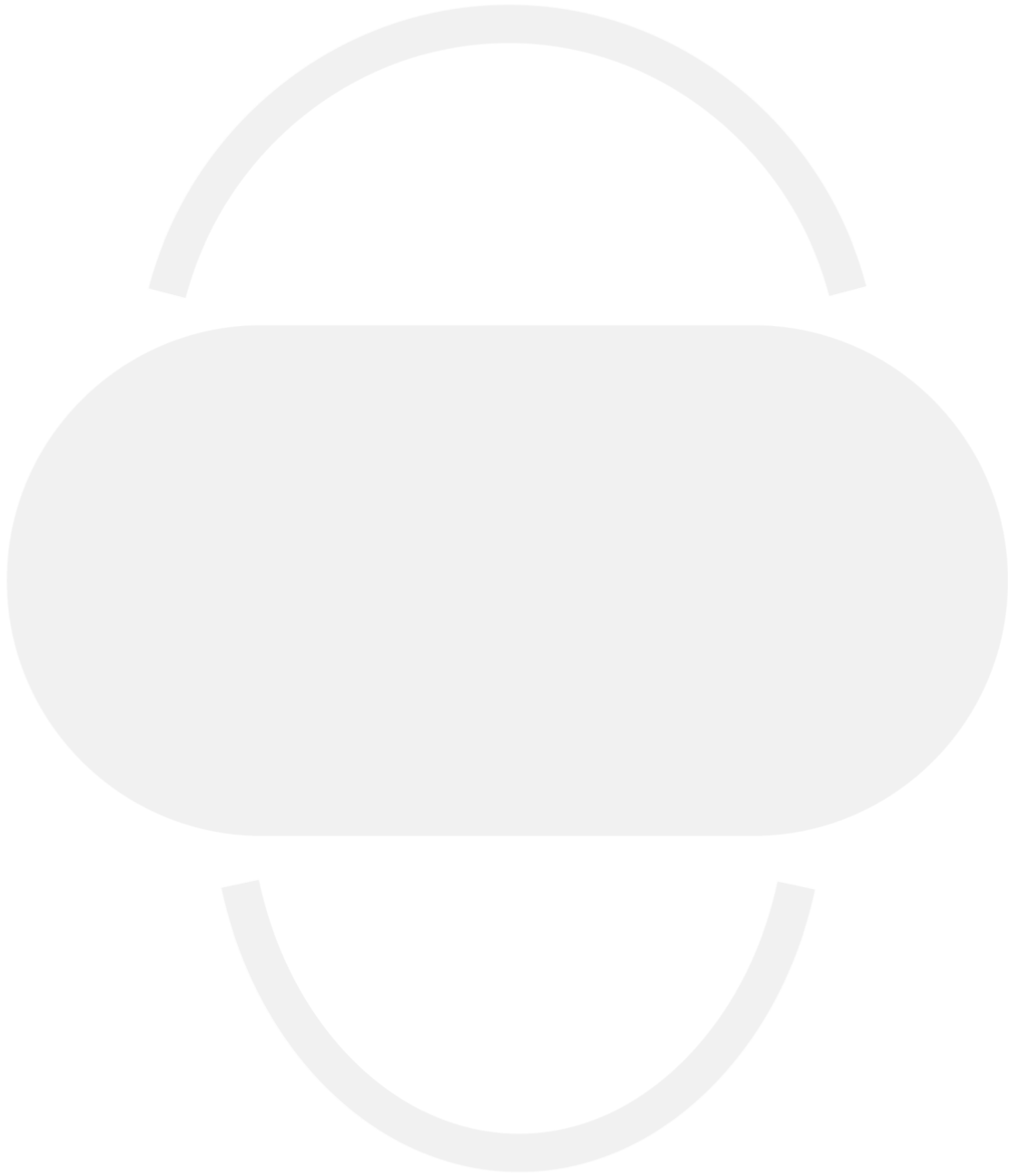
You can contact us or use other options to resolve any complaints.

If you have questions or complaints regarding this Policy, please first contact [VRCentre online](#). You can also reach us by [physical mail](#).

Consent

Where we process data based on consent, we will ask for your explicit consent. You may withdraw your consent at any time, but that will not affect the lawfulness of the processing of your personal data prior to such withdrawal. Where we rely on contract, we will ask that you agree to the processing of personal data that is necessary for entering into or performance of your contract with us. We will rely on legitimate interests as a basis for data processing where the processing of your data is not overridden by your interests or fundamental rights and freedoms.

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