

## **Battle of Minds: Privacy Policy**

**Last updated:** 19<sup>th</sup> Aug 2015

This is the privacy policy ("Privacy Policy") of Battle of Minds ("BOM"). Your privacy is important to ConveGenius Global. This Privacy Policy covers how we collect, use, disclose, transfer, and store information that we receive when you use our Services (as defined in our Terms of Service, accessible at ["Terms of use"](#)). This Privacy Policy sets out how BOM will manage your personal information which we collect as a result of your membership of BOM mobile app, your use of our websites located at [www.battleofminds.net](http://www.battleofminds.net), any pages or websites under the 'BOM' brand and any 'BOM' mobile phone or tablet applications that are owned and/or operated by us (together, "the website") or whenever we otherwise deal with you. We are committed to ensuring that the personal information we collect about you is protected and is used, stored and disclosed in accordance with the Privacy Act and this Privacy Policy.

### **Mobile App and Website Usage:**

In using the mobile app and webpage you agree to be bound by the terms of this Privacy Policy. BOM may review the Privacy Policy periodically and reserves the right to change the Privacy Policy at any time at its discretion by posting such changes on the mobile app/website. Changes will be effected immediately when posted on the mobile app announcements. Your continued use of the mobile app following posting will constitute your acceptance of those changes.

This Privacy Policy will not apply to websites which are linked to the mobile app and over which BOM has no direct or indirect control. In this Privacy Policy, a reference to "Privacy Principles" ("PPs") means the PPs contained in the Privacy Act.

### **Personal information**

The kinds of Personal Information that BOM generally collects from you is:

- Name
- Gender
- Photographs or images
- Personally submitted preferences

- Sensors Data – Accelerometer, Gravity, Gyroscope, Magnetic Field, Pressure, Proximity, Location and Rotation.
- Other Identity verification information (i.e. email address)

### **Collection purposes**

BOM will collect your Personal Information only by lawful and fair means and not in an intrusive way to operate its business as an **edutainment gaming network** for the following purposes:

- if you wish to subscribe to BOM's Monthly newsletter
- to process your application to become a member of BOM ("Member")
- to provide services to you as a Member
- to identify you as a Member for security purposes and to comply with our legal obligations
- to upgrade and enhance your experience within the website or over the telephone, or to tailor or develop information, services or products to suit your needs which may include market research and conducting promotions
- to tell you about our products or services that we think may be of interest to you by communicating with you via email, SMS or telephone
- to create aggregate data anonymously about Members through demographic profiling, statistical analysis of the database to provide to potential and existing stakeholders, and to allow for more efficient operation of BOM's business
- to determine Members' liability to pay goods and services tax and other taxes where applicable
- to comply with BOM's legal and statutory obligations including in relation to customer identity verification and reporting obligations imposed by the *Anti-Money Laundering and Counter Terrorism Act of any country regulatory requirement*.
- for taking appropriate action if BOM has reason to suspect that unlawful activity or misconduct of a serious nature has been, is being or may be engaged in that relates to our functions and activities
- to establish, exercise or defend any legal claims; and
- manage job applications.

You may choose to deal with us on an anonymous basis or to use a pseudonym unless it is not practicable for us to deal with individuals who we cannot identify or we are required by law to only deal with identified individuals. Also, if you do not provide BOM with the Personal Information we request, we may be unable to process your application to become a member, provide you with our services or respond to your enquiry or complaint.

Examples of Personal Information that may be collected by BOM include your name, email address, telephone numbers etc.

By becoming a Member, or otherwise choosing to provide BOM with specific Personal Information, you consent to BOM collecting, using and disclosing your Personal Information for the above purposes.

### **Cookies**

Personal Information may also be collected by cookies when you use the website. Cookies are pieces of data stored by your web browser on your hard drive which contain information relating to your use of the website. When you access the website, cookies may record details relating to your use of the website, including what pages you view from the website. BOM does not use cookies to track your Personal Information and uses them for internal management purposes only.

We may use third-parties to serve ads on our website. These companies may employ cookies and action tags (also known as single pixel gifs or web beacons) to measure advertising effectiveness. Any information that these third parties collect via cookies and action tags is completely anonymous.

### **Direct marketing and opting out**

When registering as a Member, you may choose to receive promotional or marketing information from BOM by selecting the appropriate option on the registration page. In that case, from time to time we may use your Personal Information to inform you about BOM's products or services or about promotional activities which BOM believes may be of interest or of benefit to you. We may do this via email, SMS, telephone or mail.

If you no longer wish to receive marketing or promotional material from BOM at all or in any particular form, you may contact us at any time by email to [hello@battleofminds.net](mailto:hello@battleofminds.net) with your request with which we will comply as soon as is practical.

From time to time we may contact you in relation to the management and administration of your BOM account. These communications can be via any of the modes of contact recorded when registering as a Member. Such communication does not affect your opt-in or opt-out status for direct marketing communications.

### **Management of your Personal Information**

BOM will take all reasonable steps to ensure that the Personal Information which it collects, uses or discloses is correct and is stored in a secure environment which is accessed only by authorized persons.

BOM will destroy or permanently de-identify the Personal Information we hold when it is no longer required for any purpose permitted under the PPs including our legal or operational obligations.

### **Disclosure**

Personal Information collected by BOM may be disclosed to a third party in the following circumstances:

- to provide you with the services or support/information you have requested;
- for any other purpose related to the purposes for which your Personal Information was collected as described in this policy which you would reasonably expect or which has been otherwise notified to you;
- the third parties or classes of third parties that BOM has at the time of collection informed you of;
- to enable BOM to participate in activities with business partners and sponsors, who will be notified to you at the time your Personal Information is collected;
- where the disclosure is required or authorised by law or otherwise permitted under the Privacy Act;

- where you have consented to its disclosure either expressly or by the circumstances and your conduct.

BOM will take all reasonable steps to ensure that any Personal Information which BOM discloses to a third party is protected by that party in accordance with the Privacy Act.

### **Security of Personal Information**

You acknowledge that no data transmission over the Internet is totally secure. Accordingly, BOM does not warrant the security of any information which you transmit to it. Any information which you transmit to BOM is transmitted at your own risk. However, once BOM receives your transmission, BOM will take reasonable steps to protect your Personal Information from misuse, loss and unauthorized access, modification and disclosure including by using password protected systems and databases and Secure Socket Layer ("SSL") technology.

BOM's employees, agents and contractors are required to maintain the confidentiality of Members' Personal Information and trading behaviour. Information posted on bulletin boards or communicated within a social media environment (for example, Facebook, Twitter, Chat Rooms) becomes public information. BOM cannot guarantee the security of this type of disclosed information.

We take seriously the responsibility to exclude children from access to our services. We will not accept their information for the purposes of opening a BOM account. It is however, ultimately the responsibility of parents or guardians to monitor their children's Internet activities including where appropriate by using Internet screening software.

Remember to always log out of your account when you have completed your time on the application. This is particularly important if you share a device with another person. You are responsible for the security of and access to your own computer, mobile device or any other handset used to access the website/application.

Ultimately, you are solely responsible for maintaining the secrecy of your username, password and any account information. Please be careful whenever using the Internet and our website/application.

## **Access to Personal Information**

You may access the Personal Information collected by BOM by following the "Profile" link on the application or by contacting us on the Customer Service hotline. We will give you access to your Personal Information in the manner requested if that is possible and within a reasonable period. If we refuse your request or cannot give you access in the manner you have requested, we will do what we can to meet your requirements by other means. We may not be required to give you access to your Personal Information in certain circumstances which are set out in the PPs including where it may have an unreasonable impact on other individual's privacy. If we refuse access for such reasons, we will advise you in writing of the refusal and our reasons and the redressal mechanisms available to you.

## **Correction and Continuous Updating of your Personal Information**

BOM takes reasonable measures to ensure that Personal Information which it collects is accurate, complete and current and also when it uses and discloses it, that it is relevant, having regard to the purpose for which it is being used or disclosed. We will take reasonable measures to correct Personal Information if we are satisfied that it should be corrected. We may contact with you on a periodic basis to seek the most up to date information from you.

If you believe that the Personal Information BOM holds about you is inaccurate, incomplete or not current, please let BOM know and we will correct it if we are satisfied that a correction is required.

Personal Information can be updated or corrected by you in the "Edit Profile" section on the application. Subject to identity verification, Personal Information can also be updated or corrected by calling BOM Customer Service hotline.

## **Overseas disclosures**

BOM may be required to disclose Personal Information overseas for legal and operational purposes.

## **Use of Mobile App and Website**

By using the mobile app and website you agree to BOM collecting and processing your Personal Information on the basis explained in this Privacy Policy.

## **Contact details**

If you have any queries, requests for access or correction or complaints relating to the handling of your personal information, please contact the Privacy Officer, whose contact details are as follows:

### **Compliance Manager**

Battle of Minds

**Tel:** 0120-4260885

**Email:** [hello@battleofminds.net](mailto:hello@battleofminds.net)

### **Updates to this Privacy Policy**

BOM may review, change and update this Privacy Policy from time to time reflect our current practices and obligations. We will publish our current Privacy Policy on our website at [www.battleofminds.net](http://www.battleofminds.net) and the changes will take effect at the time of publishing. You should review this privacy policy regularly and remain familiar with its terms.

For a copy of our current Privacy Policy, please contact us at the contact details above.