

PULSAR\*GROUP

# Privacy Policy



# Pulsar Group Privacy Policy

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## Who we are

Pulsar Group Plc (formerly Access Intelligence Plc) and its subsidiaries operating the Pulsar, Isentia, ResponseSource and Vuelio brands globally (collectively, **Pulsar Group, company, we, us or our**), are a global group of technology companies, which together deliver high-quality SaaS products for leading global organisations in the marketing and communications industries.

The evolving Pulsar Group portfolio includes:

- [Pulsar](#), the audience intelligence and social listening platform, which combines conversational and behavioural signals from the world's leading digital sources to help organisations understand their audiences and create messages that matter to them;
- [Isentia](#), the market-leading media monitoring, intelligence and insights company headquartered in Sydney, Australia, operating in Australia, New Zealand and parts of South-East Asia;
- [Vuelio](#), which provides monitoring, insight, engagement and evaluation tools for politics, editorial and social media in one place; and
- [ResponseSource](#), the network that connects journalists and influencers to the PR and communications industry.

The Pulsar Group includes those companies that operate the above portfolio globally. A full list of the companies currently part of the Pulsar Group is set out in Appendix B.

## What is this policy?

The Pulsar Group is committed to protecting your personal data in accordance with all applicable data protection laws (**Data Protection Law**). The purpose of this policy is to provide you with transparency about our collection, usage, disclosure, maintenance, storage, retention and destruction of personal data.

This policy serves as a privacy policy and privacy notice that applies to all Pulsar Group entities – whether related to our website, marketing activities, products or services etc., and whether we act as a controller (i.e. an entity that determines the purpose and means for processing personal data) or a processor (i.e. an entity that processes personal data on behalf of the data controller).

This policy sets out the minimum requirements for all of the Pulsar Group for the protection of personal data in accordance with Data Protection Law. Where a jurisdiction in which we operate has regulatory obligations over and above the minimum requirements set out in this policy, for that jurisdiction these additional requirements are included in the Appendix A.

In most jurisdictions where we operate, the protections set out in this policy also apply to the personal data of our employees (however, this may not be the case in every jurisdiction we operate in, such as Australia – see Appendix A for further details).

## The type of personal data we collect and hold

Personal data is information that relates to an identified or identifiable individual, or otherwise as that term or similar terms are defined under Data Protection Law (**Personal Data**).

The kinds of Personal Data we collect and hold about you depends on the nature of your dealings with the Pulsar Group and the circumstances of collection. This includes whether we collect the information from you as a customer, supplier, contractor, job applicant, influencer or in some other capacity. The types of Personal Data we collect might include names, address, email, telephone numbers, job title and industry. We may also collect other information you choose to provide us and details of the interactions that you have with us.

For example, we currently collect and process the following information:

- **Public information** – We may collect Personal Data from the public domain and social media sites and from other providers for the purposes of our research and analytics services. Further, our services collect and process information from a range of publicly available online sources, such as social networking sites and blogs. This content is only information that has been made publicly available, which can include Personal Data. We may also collect your details from publicly available sources such as LinkedIn and Google, as well as lead generation providers, in order to send you information about our services;
- **Influencers** – If you have influence over an audience (e.g. journalists, subject/domain experts, bloggers etc.), we may collect your professional information which may include personal data, including: your full name, company name, job title, email address, telephone number, postal address/location, social handles/IDs, publicly available social media content, biography and work history. Influencers are sent a privacy notice email that references this Privacy Policy to ensure they are aware of our processing and their rights;
- **Contact information** – We collect your information when you contact us (whether in writing, electronically or by telephone) or use our websites and products (including when you use our websites to login, register for a webinar, download whitepapers or complete surveys), which may include: your full name, company name, job title, industry, email address, telephone number, postal address/location, IP address and social handles/IDs;
- **Job applicant information** – As a job applicant, we may also collect your C.V. and cover letter;
- **Survey information** – We may also ask you to complete surveys that we use to help us improve our software and services, although you do not have to respond to them;
- **Behavioural information** – In addition to the above, we collect information automatically about your visit to our website. Please see our Cookies Section for more details; and

- **Sensitive Personal Data** – Includes information relating to your health, genetic or biometric data, sexual orientation, racial or ethnic origin, political opinions, religious or philosophical beliefs and trade union membership, amongst other things, depending on how that term or similar terms are defined in the relevant Data Protection Law (**Sensitive Personal Data**). We do not expect any sensitive personal data in our processing, but in certain circumstances, e.g. it is publicly available online, it may be included in our processing. The only exception is related to UK political contacts where we include which political party they are affiliated with.

## How we collect Personal Data

We may collect Personal Data directly from you as described above.

Our in-house Research Teams also contact media outlets to collect accurate professional information of individuals working there. However, we may also collect contact details and other information about you from our affiliates and from third parties, including:

- Service providers that help us identify individuals and companies interested in our products;
- Businesses with which we offer co-branded services or engage in joint marketing activities; and
- Publicly available sources and data suppliers from which we obtain data to validate or supplement the information we hold.

In relation to the above mentioned service providers, we may receive data – including Personal Data – from third-party social media platforms and other online sources in order to provide our services (for example, Meta and X). We work in accordance with their individual privacy policies and our contracts with them. We only receive and process Personal Data that has been made publicly available by the individual data subject. This could include Sensitive Personal Data, or other special category information as defined under current Data Protection Law. For example, in relation to the YouTube Services API, we process the following YouTube user information: subscriber count, views, video title, video description, video ‘like’ count and viewer demographics. We use this data to help provide insights from across different audiences including analytics information and visualisations for owned content performance and benchmarking. We can also gain insights into individual data subjects to help organisations and brands understand the individuals’ interactions with them. The data we obtain depends upon the source and what individuals have chosen to make available. We may analyse the information published to gain additional insights such as gender, interests and geographic location.

Individuals can change their privacy settings at any time to alter the way they share their information publicly. We only have access to this data for as long as the individual makes it publicly available.

## Why we collect, hold, use and disclose your Personal Data

We collect, hold, use and disclose Personal Data for the following purposes:

- Responding to your enquiries as a data subject;
- Dealing with enquiries and requests about our services submitted to us via email or call;
- Requesting information about your services which are applicable to you, your company, our company and our clients;
- Deliver the contracted services and allow full use of the application functionality as purchased by the clients;
- Deliver training and support to our application end users and/or carry out the transactions you have requested;
- To communicate with you directly through emails, calls, chats, video conferencing;
- Process payments for application subscriptions;
- Carry out market research to understand how to improve our services and their delivery;
- Create and manage marketing campaigns;
- Generate sales leads and increase our market share;
- Analyse user clicks and usage of the application and website to improve user experience and maximise usage of our services;
- Prevent fraud and other prohibited or illegal activities;
- Protect the security or integrity of the website, application, our business or services; and
- Otherwise, as disclosed to you at the point of collection or as required or permitted by law.

Please note that sometimes we may record the video conferencing call in which you participate to analyse and improve our staff's communication skills. If we do so, we will be announcing it at the beginning of the conference call and in the meeting invite, and we will be providing a link to this policy in the meeting invites and on the registration page.

We may use and disclose your information for other purposes required or authorised by or under law (including purposes for which you have provided your consent).

If we are unable to collect Personal Data from or about you, we may not be able to respond to your requests or enquiries or engage in other dealings with you.

## Disclosure of Personal Data to third parties

We will only disclose your Personal Data in accordance with applicable laws and regulations. In some instances, this will include sharing your Personal Data with third parties such as:

- **Applications and services** – If you are a data subject in our platform, your Personal Data may be viewed by our clients' users with access to the platform; and
- **Service providers** – We use third parties to help us provide our products and services. They may have access to your information as collected by the website or the platform, as reasonably necessary to perform the contracted tasks on our behalf. We sign contractual agreements to obligate them to protect the Personal Data, only use it to deliver the contracted services to us, prohibit them from selling it and not disclose it without our knowledge and permission. A list of our processors and sub-processors is available [here](#).
- **Group companies** – your personal data may be shared with other companies in the Pulsar Group.

We may also disclose your personal information for the following: (1) to comply with applicable law, regulation, court order or other legal process; (2) to enforce your agreements with us, including this Privacy Policy; or (3) to respond to claims that your use of the Service violates any third-party rights. If the Service or our company is merged or acquired with another company, your information will be one of the assets that is transferred to the new owner.

## How we hold Personal Data, and quality and security of Personal Data

We adopt appropriate data collection, storage and processing practices and security measures to protect against misuse, interference and loss, as well as unauthorised access, modification or disclosure of your personal or transactional information stored on our website and systems. The security of your information is important to us, and we are committed to protecting the security of all of the personal information we process. Pulsar Group uses a variety of physical, administrative and technical safeguards designed to help protect it from unauthorised access, use and disclosure. We have implemented best-practice standards and controls in compliance with internationally recognised security frameworks, including:

- Data Encryption
- The Principle of Least Privilege
- Staff security awareness training
- Vulnerability scanning and penetration tests
- Endpoint Detection and Response

All Personal Data and other Information within Pulsar Group is governed by a management system which has been certified as ISO 9001 and ISO 27001 compliant. These certifications provide interested parties with assurance of the quality and security of Pulsar Group's technical and organisational controls. For more details, please refer to our [Trust Centre](#).

## How long will we store your personal data?

We typically keep client account Personal Data for up to 7 years after the creation date to operate the service in accordance with legal requirements and tax and accounting rules or as otherwise permitted by applicable law.

Where you are an Influencer, we will retain your personal information until either (a) you request us to cease processing such information in accordance with your data protection rights or (b) you cease to be professionally active for a significant period of time.

In addition, Pulsar Platform keeps Personal Data of social media users for up to 2 years. Where any Personal Data is no longer required or is no longer relevant, we will ensure it is disposed of in a secure manner.

## Your rights

Each jurisdiction grants individuals certain legal rights in respect of their Personal Data. No matter where you are resident, you have the following rights in relation to how the Pulsar Group processes your Personal Data:

- **Right to lodge a complaint** – You have a right to lodge a complaint to us at any time if you object to the way in which we have processed or managed your Personal Data (see Appendix B). Where you are dissatisfied with our response, you also have the right to escalate your complaint to the relevant regulator in your jurisdiction. Further information can be located on the applicable regulator’s website (see Appendix C);
- **Right of access** – All individuals have a right to access their Personal Data held by an organisation. We will generally provide you with access to your Personal Data (subject to some exceptions permitted by law), but may charge an access fee to cover the cost of retrieving the information and supplying it to you. Please contact us (using the relevant contact details set out in Appendix B) if you would like to access the Personal Data we hold about you;
- **Right of rectification/correction** – We take reasonable steps to ensure that the Personal Data we collect and hold about you is accurate, up-to-date and complete. Please contact us (using the relevant contact details set out in Appendix B) if you would like to correct the Personal Data we hold about you; and
- **Right to opt-out from receiving any direct marketing** – You can ask us to stop sending you marketing messages at any time. Please see the Marketing section below for instructions on how you can do this.

Additional rights or exceptions apply to individual’s resident in the EU, UK and Australia, which are outlined in Appendix A of this policy.



## Marketing

We believe in being open, honest and transparent with our clients and suppliers and want you to feel comfortable about how we collect your Personal Data and how we process it. We may use your Personal Data to communicate with you about our products and services, special offers, promotions and events that may be of interest to you, or other information which may help you in your role or help your company achieve its objectives.

You have the right to opt-out from receiving any direct marketing messages. You can ask us not to send you marketing messages by following the unsubscribe instructions that appear in our communications. Alternatively, you can let us know at any time that you no longer wish to hear from us by contacting us using the relevant contact details set out in Appendix B.

In certain instances, we collect and use your Personal Data by relying on the legitimate interest legal basis where available under Data Protection Law. This is because when you, for example, request to receive services or products from us, we have a legitimate organisational interest to use your Personal Data to respond to you and there is no overriding prejudice to you by using your Personal Data for this purpose. However, we will always provide you with the option to opt out of hearing from us.

We will only communicate to you in the way you have told us. For example:

- **Email/text marketing** – In accordance with applicable law, where you provide us with your email address and/or mobile phone number, we may contact you for marketing purposes by email or text message; and
- **Post/telephone marketing** – If you have provided us with your postal address or telephone number, we may send you direct mail or telephone you about our work unless you have told us that you would prefer not to receive such information.

## Cookies

Our websites use a software technology called "cookies". A cookie is a small data file that contains information about a visit to a website. This information is provided by an individual's computer the first time it visits a web server. The server records this information in a text file and stores this file on the hard drive. When that individual visits the same web site again the server looks for the cookie and structures itself based on the information provided. Most browsers are initially set up to accept cookies, but they can be reset to refuse all cookies or to warn you before accepting cookies.

Cookies enable us to identify your device. We use cookies that are strictly necessary to enable you to move around the site or to provide certain basic features. We use cookies to enhance the functionality of the website by storing your preferences, for example. We also use cookies to help us to improve the performance of our website to provide you with a better user experience. We also allow cookies that may be served where we embed social media links such as Twitter, YouTube and LinkedIn.

The following types of cookies may be used when you visit the site:

- **Strictly necessary cookies** – These cookies are essential in order to enable you to move around our website and use its features. Without these cookies, services you have asked for cannot be provided. They are deleted when you close the browser;
- **Performance cookies** – These cookies collect information in an anonymous form about how visitors use our website. They allow us to recognise and count the number of visitors and help us understand which pages are the most popular and where visitors spend most of their time;
- **Functionality cookies** – These cookies allow our website to remember choices you make, such as your name, the region you are in or the pages you have viewed. They are used to provide enhanced and more personal features. If you personalise our pages, or register with our website or services, a persistent cookie helps us to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to our website, the information you previously provided can be retrieved, so you can easily use the features that you customised. Persistent cookies will be kept on your device until their expiry or manual deletion;
- **Targeting or advertising cookies** – The Pulsar Group does not sell Personal Data to advertisers. These cookies allow us and our advertising partners to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of advertising campaigns. They remember that you have visited our website and may help us in compiling your profile; and
- **Social Media cookies** – These cookies allow you to connect with social media networks such as Facebook, LinkedIn, X, Pinterest. If you do not want us to use cookies in your browser, you can remove cookies from your computer's hard drive, or set your browser to block cookies or to send a warning notice before a cookie is stored on your computer. However, please note that you may not be able to use many of the services on our website or other websites without cookies.

More detailed information on cookies can be found at [www.allaboutcookies.org](http://www.allaboutcookies.org).

## Who can you speak to about this policy?

If you would like more information about our approach to privacy, or if you wish to contact us regarding the information set out in this policy, please refer to Appendix B of this policy for details of relevant local contact(s) in your jurisdiction.

Please contact us (using the contact details in Appendix B) if you have any concerns or complaints about the manner in which we have handled your Personal Data. We may ask you to put your concern or complaint in writing and provide details about it. You also have the right to complain to the relevant regulator in your jurisdiction, and in certain circumstances, to lodge an appeal if you are not happy with the outcome of a complaint. Please refer to Appendix C of this policy for details.

## Changes to this policy

We may amend this privacy policy from time to time at our discretion. Amended versions will be posted at <https://www.pulsargroup.com/privacy-policy/>

## Appendix A: Additional privacy requirements

### A.1 For individuals based in the UK and the EU

#### Where we are a data controller

If you are based in the UK or elsewhere in the EU, the relevant Pulsar Group member is the controller of your Personal Data collected in the following instances:

- When you visit one of our products or websites:
  - <http://www.pulsargroup.com/>
  - <https://www.vuelio.com/>
  - <https://www.responsesource.com/>
  - <https://www.pulsarplatform.com/> ; and/or
  - <https://www.isentia.com/>
- When we process your Personal Data for sales and marketing purposes.
- When we collect your Personal Data for use in our systems and products.

#### Our basis and interests in processing of your Personal Data

Under the EU and UK GDPR, we are required to have a legal basis for processing your Personal Data. Our legal basis for processing of your Personal Data is as follows:

- **Contract** – Processing is necessary to meet contractual obligations entered into by us with our clients;
- **Legitimate interests** – Processing is necessary for purposes of our legitimate interests and not overridden by your rights, or, our client in relation to goods and services when we process the names, contact details, job titles, companies of our existing and prospective clients for our marketing purposes, including market research and sales leads generation; and
- **Legal obligation** – Processing is necessary to comply with a legal or administrative obligation(s).

Under the EU and UK GDPR, our legitimate interests are as follows:

- Responding to your enquiry about our processing of your Personal Data;
- In response to an enquiry from you about our good and services;

- For the purpose of promoting our goods and service via direct marketing which are relevant to you in your role. We will always confirm how your Personal Data was obtained and always offer an opt out of direct marketing communications;
- The operation of our Websites (for example we collect information about usage and engagement with our Website to improve its functionality, personalisation and security);
- Our provision of Services and communicating with you or our customers as necessary to provide our Services;
- Detecting or preventing illegal activities; and
- (if you are an Influencer) our using your information for the purposes of:
  - (i) compiling and maintaining our Databases, to ensure our customers have access to the most comprehensive and up-to-date information and thereby ensure they engage with Influencers in ways that are relevant, timely and targeted;
  - (ii) providing you with marketing information, regular news bulletins and other information which we consider you find useful, interesting and/or of relevance to your role as an Influencer;
  - (iii) referring your personal information to customers of our Databases, public relations and marketing professionals, public relations agencies and corporate press offices and other users of our services when you make an enquiry through our enquiry service; and
  - (iv) providing you with newsletters containing regular news bulletins, details regarding our products and services, latest blog content, industry news and any other information related to or otherwise connected with the above.
- Operating commercial products and services. We make sure that we check and balance any potential negative impacts on you before we process personal data for our legitimate interests. We do not use your personal data for activities where our legitimate interests are overridden by the impact on you.

## Your additional rights under the EU and UK GDPR

In addition to those rights outlined in the "Your rights" section above, you have the following additional rights under the EU and UK GDPR:

- **Your right to erasure** – You have the right to ask us to erase your Personal Data in certain circumstances. However, there may be some legal and regulatory obligations which mean we cannot comply with your request;
- **Your right to object** – You have the right to object to the processing of your Personal Data in certain circumstances. This right is also available to individuals whose Personal Data is processed

by us for direct marketing purposes. If you object to the processing of your Personal Data for direct marketing purposes, we shall stop processing within one month of receipt of your request;

- **Your right of data portability** – You have the right to ask that we transfer the Personal Data you gave us to another organisation, or to you, in certain circumstances. Once transferred, the other party will be responsible for looking after your Personal Data;
- **Your right to restrict our processing** – You have the right to ask us to restrict the processing of your Personal Data in certain circumstances, for example, if the processing of your Personal Data is unlawful and you do not want us to delete it;
- **Your right to withdraw consent** – For certain limited uses of your Personal Data, we may ask for your consent. Where we do this, you have the right to withdraw your consent at any time; and
- **Your right not to be subjected to automated–decision making** (that is, using technology solutions rather than human judgement to automatically determine an outcome) – You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces a legal or similarly significant effect on you, unless it is: (1) necessary for a contract between us and you; (2) authorised by EU law; or (3) based on your explicit consent. You can object to an automated decision we have made and ask that a person reviews it. Currently, we do not make decisions about you solely based on automated processing.

In some circumstances exercising some of these rights will mean we are unable to respond to your requests or enquiries or engage in other dealings with you.

### How we approach transferring and processing your Personal Data internationally

Sometimes Pulsar Group entities or third parties who we share your Personal Data with (see the section titled "Disclosure of Personal Data to third parties"), will process your Personal Data outside of the European Economic Area (EEA) and UK.

In particular, Vuelio and ResponseSource host data in the UK and Pulsar hosts data in Ireland and, depending on subscription, share it with our service providers in the EU, USA and other jurisdictions. If you are an EU or UK resident, when your Personal Data is processed outside of the EU or UK, we will ensure that appropriate safeguards are in place. We will also require that any such Pulsar Group entity or third party outside of the EEA or UK has put in place adequate safeguards to ensure that your Personal Data is held securely and in accordance with this policy. For example, we use standard contractual clauses as the data transfer mechanism of transferring UK/EU data to countries subject to data transfer requirements.

If we are to undertake a transfer of your Personal Data to a non-adequate third country (i.e. a country outside of the EEA or UK that has not been granted data "adequacy" status from the European Commission or UK government), we will implement appropriate safeguards to ensure that you have essentially equivalent protection to the EU and UK GDPR e.g. Standard Contractual Clauses (SCCs)

If you would like further information on the safeguards we use to share Personal Data internationally, please contact your local privacy/data protection officer (using the relevant contact details set out in Appendix B).

## A.2 For individuals based in California

This section provides additional specific information for consumers based in California as required by the California Consumer Privacy Act of 2018 ( **CCPA** ).

### Collection and use of personal information

In the last 12 months, we have collected the following categories of personal information:

- Identifiers, such as your name, mailing address, email address, zip code, telephone number or other similar identifiers;
- California Customer Records (Cal. Civ. Code § 1798.80(e)), such as username and password, company name, job title, business email address and department;
- Internet/network information, such as log and analytics data, information about the device(s) used to access the services and information regarding your interaction with our websites or services and other usage data;
- Geolocation data, such as information about your location (at country and city level) collected from your IP address;
- Sensory Information, the content, audio and video recordings of conference calls between you and us that we record where permitted by you and/or the law;
- Profession/employment information that you send to us when applying for a position included in your CV and cover letter; and
- Other personal information, such as personal information you provide to us in relation to a survey, comment, question, request, article download or inquiry and any other information you upload to our application.

We collect personal information directly from you, from your browser or device when you visit our websites, from third parties that you permit to share your information or from third parties that share public information about you, as stated above.

### Recipients of personal information

We share personal information with third parties for business purposes. The categories of third parties to whom we disclose your personal information may include: (i) our service providers and advisors, (ii) marketing and strategic partners; (iii) ad networks and advertising partners; (iv) analytics providers; and (v) social networks.

## California privacy rights

As a California resident, you may be able to exercise the following rights in relation to the personal information about you that we have collected (subject to certain limitations at law):

- The right to know any or all of the following information relating to your personal information that we have collected and disclosed in the last 12 months (upon verification of your identity);
- The specific pieces of personal information we have collected about you;
- The categories of personal information we have collected about you;
- The categories of sources of the personal information;
- The categories of personal information that we have disclosed to third parties for a business purpose, and the categories of recipients to whom this information was disclosed;
- The categories of personal information we have sold and the categories of third parties to whom the information was sold;
- The business or commercial purposes for collecting or selling the personal information;
- The right to request deletion of personal information we have collected from you, subject to certain exceptions; and
- The right to opt-out of personal information sales to third parties now or in the future. However, we do not sell your personal information.

You also have the right to be free of discrimination for exercising these rights. Please note that if exercising these rights limits our ability to process personal information (such as a deletion request), we may no longer be able to provide you with our products and services or engage with you in the same manner.

Note that we will only be able to directly process the above requests in situations where we are the “business” under the CCPA, which refers to the entity that determines the purpose and means of information processing. This includes some situations where you provided the relevant information directly to us. However, in many cases we are instead a “service provider” under the CCPA, and are processing personal information on behalf of our customer or our client’s customer, who provided the information to us or on whose behalf we are collecting your personal information, and our customer or our client’s customer acts as the “business” under the CCPA. In those situations where we are acting as a service provider, we will refer your request to the applicable business instead.

## How to Exercise Your California Consumer Rights

To exercise your right to know and/or your right to deletion, please submit a request by contacting us at [DPO@accessintelligence.com](mailto:DPO@accessintelligence.com).



We will need to verify your identity before processing your request. In order to verify your identity, we will generally require sufficient information from you so that we can match it to the information we maintain about you in our systems. Sometimes we may need additional personal information from you to be able to identify you. We will notify you.

We may decline a request to exercise the right to know and/or right to deletion, particularly where we cannot verify your identity or locate your information in our systems or as permitted by law.

Our application and services are intended for business use, and we do not expect them to be of any interest to minors. We do not intentionally collect any personal information of consumers below the age of 16. We do not sell the personal information of California consumers.

## A3 For individuals based in Australia

### Australian privacy laws

Personal information collected in Australia must be handled in accordance with this policy and any additional requirements imposed by applicable Australian privacy laws, including the Privacy Act 1988 (Cth) (**Australian Privacy Act**) and its Australian Privacy Principles (**APPs**).

### What is "personal information"?

Under the Australian Privacy Act, "personal information" is information or an opinion, in any form and whether true or not, about an identified individual or an individual who is reasonably identifiable.

"Sensitive information" is a special category of personal information. Sensitive information includes Sensitive Personal Information (as defined above) and also includes the following for individuals in Australia:

- trade union and/or political party affiliation; and
- criminal records.

### Employee records exemption

If you are or have been our employee in Australia, the handling of your personal information may be exempt from the APPs if it is directly related to your current or former employment relationship with us.

### Disclosure of personal information to overseas recipients

We may disclose your personal information to recipients in other countries, for example:

- some of our service providers who handle personal information on our behalf are located outside Australia. Examples are USA; and

- some of our related companies with whom we share personal information are based in other countries, including the UK.

## Complaints

Please contact us (using the relevant Australian contact details in Appendix B) if you have any concerns or complaints about the manner in which we have handled your personal information. We may ask you to put your complaint in writing and provide details about it. We will inquire into your complaint and respond to you in writing usually within 30 days. If you are not satisfied with our response, you can contact us to discuss your concerns or lodge a complaint with the Australian Information Commissioner (see Appendix C for further details).

## Appendix B: Pulsar Group and its privacy/data officer contact details

Privacy/data officer contact details	Pulsar Group member(s)
<ul style="list-style-type: none"> <li>● <b>Address:</b> 79 Hatton Garden, London, EC1N 8AW</li> <li>● <b>Email:</b> <a href="mailto:dpo@pulsargroup.com">dpo@pulsargroup.com</a></li> <li>● <b>Phone:</b> 0843 6592941</li> </ul>	<ul style="list-style-type: none"> <li>- Pulsar Group plc</li> <li>- Fenix Media Limited (trading as "Pulsar Platform")</li> <li>- Access Intelligence Media and Communications Limited (AIMC) / AI Media Data Limited (AIMD) trading as "Vuelio"</li> <li>- ResponseSource Ltd trading as "ResponseSource"</li> </ul>
<ul style="list-style-type: none"> <li>● <b>EU Data Representative</b></li> <li>● <b>Address:</b> 69 Esker Woods Drive, Lucan Co., Dublin, Ireland</li> <li>● <b>Email:</b> <a href="mailto:contact@gdprlocal.com">contact@gdprlocal.com</a></li> <li>● <b>Phone:</b> + 353 15 549 700</li> </ul>	<ul style="list-style-type: none"> <li>- As above.</li> </ul>
<ul style="list-style-type: none"> <li>● <b>Address:</b> Level 3, 219-241 Cleveland St, Strawberry Hills, NSW 2012, Australia</li> <li>● <b>Email:</b> <a href="mailto:contact@isentia.com">contact@isentia.com</a></li> <li>● <b>Phone:</b> +61 2 9318 4000</li> </ul>	<ul style="list-style-type: none"> <li>- Isentia Pty Limited (ACN:002 533 851) <b>Australia</b></li> <li>- Isentia Brandtology Pte Ltd (200810656C) <b>Singapore</b></li> <li>- Isentia Limited (14718020) <b>New Zealand</b></li> <li>- Isentia (M) SDN BHD (199701020769(436266-H) <b>Malaysia</b></li> <li>- Isentia Manila Inc (A200204277) <b>Phillipines</b></li> <li>- PT Isentia Jakarta (0901.1.70.212745) <b>Indonesia</b></li> <li>- Isentia Vietnam Co (0310819007) <b>Vietnam</b></li> <li>- Isentia Bangkok Co. Limited (0105555061101) <b>Thailand</b></li> </ul>

## Appendix C: Regulatory authority per jurisdiction

For the EU national data protection authorities, their contact details can be found [here](#).



Otherwise, the contact details of the other relevant regulatory authorities are set out in the table below:

Country	Authority name	Website
<b>Australia</b>	Office of the Australian Information Commissioner ( <b>OAIC</b> )	<a href="http://www.oaic.gov.au">www.oaic.gov.au</a>
<b>United Kingdom</b>	Information Commissioner's Office	<a href="http://www.ico.org.uk">www.ico.org.uk</a>
<b>New Zealand</b>	The Privacy Commissioner's Office	<a href="http://www.privacy.org.nz">www.privacy.org.nz</a>
<b>Switzerland</b>	Federal Data Protection and Information Commissioner	<a href="http://www.edoeb.admin.ch">www.edoeb.admin.ch</a>
<b>Singapore</b>	Personal Data Protection Commission Singapore	<a href="https://www.pdpc.gov.sg/">https://www.pdpc.gov.sg/</a>
<b>Malaysia</b>	Personal Data Protection Department	<a href="https://www.pdp.gov.my/jpd/pv2/?lang=en">https://www.pdp.gov.my/jpd/pv2/?lang=en</a>
<b>Philippines</b>	National Privacy Commission	<a href="https://privacy.gov.ph/">https://privacy.gov.ph/</a>
<b>Indonesia</b>	Ministry of Communications and Informatics of the Republic of Indonesia pending establishment of Personal Data Protection Agency	<a href="https://www.kominfo.go.id/">https://www.kominfo.go.id/</a>
<b>Thailand</b>	The Personal Data Protection Committee	<a href="https://pdpathailand.com/pdpa/p5_eng.html">https://pdpathailand.com/pdpa/p5_eng.html</a>
<b>Vietnam</b>	Ministry of Information and Communications	<a href="https://english.mic.gov.vn/Pages/home.aspx">https://english.mic.gov.vn/Pages/home.aspx</a>

## Document Version Control

This policy shall be reviewed if required changes are identified to address an identified weakness, a change in business activities which may affect the validity of this document.

The current version of this policy, together with its previous versions, shall be recorded below:

Version	Change	Author	Approver	Signature
1.0	New GDPR Privacy Policy for Vuelio and Access Intelligence.	David Roud Data Protection Officer 25/05/2018	Mark Fautley CFO 25/05/2018	
2.0	Updated to reflect the acquisition of Pulsar Platform. Added CCPA.	Adam Palmer Data Protection Officer 01/09/2022	Tom Golding COO 01/09/2022	<i>T. Golding</i>
3.0	Updated to reflect shared purposes of Vuelio, ResponseSource and Pulsar Platform.	Adam Palmer Data Protection Officer 02/03/2023	Tom Golding COO 02/03/2023	<i>T. Golding</i>
4.0	New Branding. Updated to reflect the acquisition of Isentia and the shared purposes of all Group subsidiaries. Added new global locations.	Adam Palmer & Jacquie Shanahan Data Protection Officer & General Counsel 08/05/2024	Mark Fautley CFO 16/5/2024	DocuSigned by:  699D2FDC0288475...