

# HelpMe Feed Privacy Policy

*Effective: May, 2019*

HelpMe Feed takes your privacy seriously and treats your Personal Data with great care. This document sets out HelpMe Feed's policy regarding privacy and security. We encourage you to read this Privacy Policy as well as our Terms of Use carefully. Your access to and use of the Services signifies that you have read, understand and agree to all terms within this Privacy Policy. If you do not agree with any part of this Privacy Policy or our Terms of Use, please do not access or continue to use any of the Services or provide your Personal Data.

We adhere to the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) and to the extent applicable, the EU General Data Protection Regulation ("**GDPR**").

## Who We Are

We are the HelpMe Feed Foundation Ltd ACN 626 589 179, a registered charity in Australia a company limited by guarantee established and existing under the laws of Australia (referred to here as "HelpMe Feed", "we", "us" or "our") and having its registered office at Level 1, 12 O'Connell Street, Sydney NSW 2000 Australia.

At HelpMe Feed, our global mission is to support breastfeeding using smart, modern and accessible technologies including our website, applications and connected products and services (the "**Services**").

HelpMe Feed is the licensee of two applications used by health professionals and coaches to gather information from, and/or provide information to parents. Both applications are linked to [www.helpmefeed.org](http://www.helpmefeed.org) (collectively referred to as the "**Application**").

Reference to HelpMe Feed in this Privacy Policy includes its licensors as applicable.

## General

Capitalized terms are defined in this Privacy Policy.

Our Privacy Policy relates to data about you, your devices, and your interaction with our Services. It describes how we collect and process your Personal Data through our Services including the website and corresponding Application.

"**Personal Data**" is information that can be used to identify you, directly or indirectly, alone or together with other information. This includes things such as your full name, email address, phone number, precise location, device IDs, certain cookie and network identifiers.

**“Sensitive Data”** is any information, including Wellbeing and Feeding Data and Interaction and Program Data, that we collect that is considered personal health data or biometric information.

All identified data including any Sensitive Data collected in the App is used by your health professional to evaluate your progress and should not, however, be considered medical advice and is not intended to be used for diagnostic purposes. Please see the Terms of Use for more information.

HelpMe Feed collects, uses, discloses and processes Personal Data and Sensitive Data as outlined in this Privacy Policy, for purposes which include, but are not limited to:

- operating and improving the Services, the Application and our business;
- conducting research related to improving our Services; and
- providing you with innovative parenting and feeding support services, as further described in this Privacy Policy.

## **IMPORTANT NOTICE**

**BY USING THE SERVICES, YOU CONSENT TO THE COLLECTION, USE AND TRANSFER OF YOUR PERSONAL DATA, INCLUDING SENSITIVE DATA, FOR PROCESSING AS DESCRIBED IN THIS PRIVACY POLICY.**

HelpMe Feed is not a health care provider and does not screen content posted by health professionals, nor does it select or screen specific programs displayed to parents that have been created and uploaded to the Application by users. Please see the Terms of Use for more information.

## **Exclusions from this Privacy Policy**

We create and store de-identified or anonymous data created from Personal Data by excluding data components (such as your name, email address, or linkable tracking ID) that makes the data personally identifiable to you, through obfuscation, or through other means. This de-identified data used by HelpMe Feed for various purposes, including but not limited to statistical analysis, research, and disclosure via licencing to approved third parties for research and public health purposes. This de-identified data is not Personal Data or Sensitive Data, and our use of this anonymized and de-identified data is not subject to privacy regulation or this Privacy Policy.

A parent can refuse to have their data de-identified and used by HelpMe Feed by contacting us at [support@helpmefeed.org] at any time. From the point that a parent specifies in writing to HelpMe Feed that they refuse to have their data de-identified (“**withdrawal**”), no further Personal Data for that parent will be de-identified and used by HelpMe Feed. However, subject to law, the withdrawal does not apply retrospectively, and any data collected prior to withdrawal will continue to be stored and used by HelpMe Feed on a de-identified basis.

## **Transfers of Your Personal Data to Other Countries**

The Services, and all associated information technology systems, are housed on servers in a number of countries. Please be aware that if you access the App in your country of residence, generally the information we collect (including cookies and device data) will be processed and stored in a server located in that country. If you access the App or Services outside of your country of residence, the information we collect (including cookies and device data) may be transferred to, processed, and/or stored in the country you access the App or Services from, rather than your country of residence.

It is important for you to note that your data may be transferred, processed and stored in a country or region in which the data protection and privacy laws, including your rights, may not give you the same level of protection as you have in the country or region where you live or are a citizen. We request in the App that you give express consent to the transfer, processing and storage of your data outside of your country of residence. If you choose not to consent to the transfer of data you will not be able to access the App or Services outside of your country of residence.

## How We Collect and Use Personal Data

We collect your Personal Data in a number of ways and for various purposes, including:

### 1. When you register for an Account

In order to make use of the Services including the Application, it is necessary to create a personal account ("**Account**"). We collect Personal Data when you use or interact with our Services, including when you create your Account and make purchases from us (including processing of payment). This Personal Data may include name, address, phone number, date of birth, username and password, email address, postcode, payment information and Location Data. "**Location Data**" means either approximate location or, with your consent, precise location. If you are a parent we collect Personal Data on your baby or child including name, gender and date of birth. Some fields are obligatory for completion in order to ensure we can enable your activity in the Service, and where this is the case we will clearly identify these fields as mandatory. For health professionals who register on behalf of an entity, information about that entity (name, contact details and location) are also required.

We use this data to create your Account, enable your activity within our Services, and to provide the services generally, including to develop, enhance and improve our Services and your experience. We also use this data for internal purposes related to certain research, analytics, innovation, testing, monitoring, customer communication, risk management, and administrative purposes.

The information contained in your Account is not visible to third parties. As a parent user your assigned health professional can see your data. When you choose to use a coach through the Services, the coach will be able to see your data for the duration of the coaching session only.

### 2. Use of the Services

You may choose to input additional data including wellbeing and feeding data on yourself and/or your baby or child, including through the completion of surveys generated by your health professional, within our Services (“**Wellbeing and Feeding Data**”). We collect this data in order to enable your use of the Services, and in particular to assist the health professional in providing you with services, advice and support through the Services. This information is shared between the parent and the health professional via HelpMe Feed and is subject to this Privacy Policy. However this data may also be de-identified by HelpMe Feed and used for its own purposes.

By using the Services, the health professional provides information about the program they have prescribed for each parent and the parents provide information about their progress with the program and their experiences while undertaking the programs and interacting with the health professional and coaches (“**Interaction and Program Data**”). This information is shared between the parent and the health professional via HelpMe Feed and may be shared with a coach if a parent chooses to commence a coaching session for the duration of the coaching session only. However this data may also be de-identified by HelpMe Feed and used for its own purposes.

HelpMe Feed will store and process identified Wellbeing and Feeding Data and Interaction and Program Data only on behalf of the health professional. HelpMe Feed will only use any parent information for its own purposes or share it with authorised third parties if it is anonymised.

If the parent is a minor (as determined by their home country), the parents or legal guardians of the minor parent will be asked by the health professional to give their consent for the processing described above. It is the health professional’s responsibility to ensure that this consent is obtained. This includes consenting to the anonymisation of the Personal Data of the minor parent.

### **3. When you give us permission to collect Location Data**

We may collect precise Location Data as part of the functionality of our Services, such as to provide information on nearby services, support or other geographically relevant Services and to conduct analytics to improve the Services. We may collect precise Location Data in several ways, such as through your wireless carrier, based on WiFi access point location, via Bluetooth beacons, through a connected device, or directly from the device on which you use the Services. If you are accessing the Services through the Application, the way we collect precise Location Data will differ depending on your mobile device's operating system. In all events, we do not collect precise Location Data unless you have consented to its collection. If you choose not to consent to Location Data collection in the Application, we will not collect your precise Location Data unless you manually enter it in.

### **4. When you communicate with us**

Please note that regardless of your email settings, we may send you notifications pertaining to the performance of our Services, such as revision of our Terms of Use or this Privacy Policy or other formal communications relating to the Services you have purchased or use.

We may use your Personal Data to respond to your requests for technical support, online services, product information or to any other communication you initiate. This includes accessing your Account to address technical support requests. We may also use your Personal Data to address your requests, inquiries, and complaints.

#### **5. When you participate in special activities, offers, or programs**

We may request or otherwise collect Personal Data, including Wellbeing and Feeding Data, when you participate in offers, surveys, or research activities or initiatives (including for academic, commercial and community planning and research study purposes). This includes Personal Data, such as name, address, email address, telephone number and age, and other information that may be appropriate in order to participate.

Any offer or survey that treats your Personal Data in a way that differs from this Privacy Policy will state the privacy policy governing that collection of information in connection with that offer or survey.

#### **6. When you engage with our online communities or advertising**

We may collect your Personal Data when you engage with our online communities. This includes when you click on advertisements, interact with our social media pages, submit content, leave reviews, or otherwise enter information into comment fields, blogs, message boards, events, and other community forums sponsored by or affiliated with us. Please note that our community forums may be public, so we recommend that you exercise care in deciding what information and content you wish to disclose.

#### **7. When we leverage and/or collect cookies, device IDs, Location, data from the environment, and other tracking technologies**

We may collect certain Personal Data using cookies and other technologies such as web beacons, device IDs, advertising IDs, geolocation, HTML5 local storage, Flash cookies, and IP addresses. We specifically use browser cookies for a range of purposes, including cookies that are strictly necessary for functionality, and cookies that are used for personalization, performance/analytics, and advertising.

You can configure your browser so that you do not receive any cookies the next time you use the Services. However it is possible that changing your browser's cookie settings may impact the functionality of the Services on your browsing device.

#### **8. When we aggregate or centralize data**

We aggregate and centralize Personal Data and other parent information for purposes of analytics, innovation, and to provide enhanced Services to our users.

#### **9. When we provide you geographically relevant Services, offers, or advertising**

Where you have provided consent to collection, we process your precise Location Data to provide you with Services that are relevant to your location.

## **10. When we comply with legal requirements or obligations, law enforcement, and for public safety purposes**

We may use Personal Data in order to: comply with laws, regulations, court orders or other legal obligations; assist in an investigation; protect and defend our rights and property, or the rights or safety of third parties; enforce our Terms of Use, this Privacy Policy, or agreements with third parties; or assist with crime-prevention purposes.

## **How We Disclose Personal Data**

We may disclose your Personal Data for the purposes as described in the prior section of this Privacy Policy, and if applicable in the Country/Region-Specific Disclosures section, and in the following ways:

1. **To Health Professionals:** to allow the health professional to use the Services (including the Application), for purposes including the management of the programs for parents, the management of the parents' progress with the program, and the provision of support by health professionals to the parents, including the exchange of additional content provided by the health professional to the parents. We may also disclose Personal Data to health professionals if we are contractually obliged to do so;
2. **To Parents:** To allow the parent to use the Services (including the Application), for purposes including to access programs and other content uploaded and provided by the health professional, provide feedback on progress, seek and obtain support from the health professional and coaches, and provide feedback to the health professional;
3. **To Coaches:** To allow the coach to use the Services (including the Application), for purposes including to provide parents with support, including the exchange of content within the Application to the parents;
4. **To our employees, agents and administrators** for purposes including to provide and administer the Services;
5. **To our accountants, financial advisors and legal advisors** for purposes including the maintenance of the Services and our business generally;
6. **To our parent company, subsidiaries and affiliates** for purposes including to provide and administer the Services;
7. **To our service providers and contractors** for purposes including to help us provide, manage, administer, monitor, distribute, operate or facilitate the Services and/or the Application, to develop, market or provide our products and Services, and to further our business efforts (for example, web hosting companies, website administrators, mobile app distribution platforms, support services companies, data analytics and analysis companies, advertising partners and payment processing vendors);

8. **To law enforcement, government or regulatory bodies, lawful authorities, or other authorized third parties:** in order to comply with laws, regulations, court orders, or other legal obligations, assist in an investigation, protect and defend our rights and property or the rights or safety of third parties, to enforce our Terms of Use, this Privacy Policy, or agreements with third parties, or to assist with crime-prevention purposes. Additional Country/Region-Specific Disclosures may apply;
9. **To any other third parties:**
  - (a) if HelpMe Feed considers it necessary to do so in defense of its own rights;
  - (b) if you have given permission for us to do so;
  - (c) for the purpose of processing payments by health professionals;
  - (d) to configure the Services and/or Application to your wishes and needs; and
  - (e) to generate anonymous statistical data.

HelpMe Feed may additionally post customer testimonials, comments or reviews on our website, which may contain Personal Data of health professionals. HelpMe Feed will obtain the health professional's consent via email prior to posting the testimonial. It is implied by posting the testimonial, comment or review that the parent consents to the publication of any Personal Data of the parent and/or of their baby or child which is disclosed in the content.

Our disclosure is limited to situations where we are permitted to do so under applicable data protection laws and regulations, including national laws and the GDPR.

## **Legal Basis for Processing**

This section addresses the legal basis for processing your Personal Data. In most cases you typically provide consent when you receive notice of this Privacy Policy in a website link or via the mobile app. Some processing is addressed in multiple sections because more than one legal basis may apply depending on the circumstances or the Service.

If you have any questions or concerns regarding the processing of your Personal Data, or if you have questions regarding this Privacy Policy, please see our Contact Us section below and Country/Region-Specific Disclosures for appropriate contact information.

## **WHERE WE DO NOT REQUIRE CONSENT**

We collect and process your Personal Data for a variety of purposes outlined in this Privacy Policy. Your consent is not required to process your Personal Data for certain purposes, including:

1. **For the performance of a contract:** to perform our contractual obligations to you, including: Account registration; contacting you in relation to any issues in relation to the provision of the Services, including when you use or interact with the Application and in relation to location-based Services (for example providing you geographically relevant Services); to connect you with health professionals and coaches; where we need to provide your Personal Data to our service providers; where we need to collect Personal Data from third party sources; when you access third party products and services; where we collect data from third parties or publicly-available sources; and to aggregate and centralize data for the performance of the Services.
2. **To meet legal obligations:** to comply with laws, regulations, court orders or other legal obligations, or to assist in an investigation.
3. **To further our legitimate interests:** where we do not seek your explicit consent to processing your Personal Data, the legal basis is our legitimate interest in operating our business and providing the Services (other than in performing our contractual obligations to you) for our lawful purposes ("**legitimate interests**"), except where overridden by your interests or fundamental rights and freedoms that require protection of Personal Data. By agreeing to the Terms of Use and this Privacy Policy, you agree to our reliance on the legitimate interests specified in this clause when processing your Personal Data.

Subject to applicable laws, our legitimate interests include:

- **Communication**: to communicate with you regarding the Services, including to provide you important notices regarding changes to our Terms of Use and also to address your requests, inquiries, and complaints. We may send strictly necessary communications, including emails, even if you have opted out of receiving other emails or communications from us. These types of communications do not require consent. We also process your Personal Data for our legitimate interests when you communicate with us, including when you sign up for promotional materials and we have not asked you for your consent in that regard.
- **Respond to Your Requests**: to respond to your requests for technical support, online services, product information or to any other communication you initiate. This includes accessing your Account to address technical support requests.
- **Promotional Messages**: to provide you with promotional messages and personalized marketing on the basis of your Personal Data (but not your Sensitive Data), including: when you communicate with us or sign up for promotional materials; when you participate in special activities, offers, or programs; when you engage with our online communities or advertising; to provide you geographically relevant Services and offers; when we aggregate and centralize data; and when we share Personal Data with companies or ventures that are owned or controlled by us and with our service providers and vendors.
- **Surveys**: to send you surveys in connection with our Services, unless commercial in nature. In those cases, a survey request may be sent to you if you have given us your consent to receive marketing from us.

- **Compliance with Law and Public Safety**: to assist in the investigation of suspected illegal or wrongful activity, including by disclosing in-store tracking information and other information with law and enforcement entities for fraud, loss and crime prevention purposes. We may similarly disclose information to protect and defend our rights and property, or the rights or safety of third parties.
- **Improvement and Development**: to develop, provide, enhance, and improve our Services and your experience, including enabling you to use the full range of our Services. Our improvement and development purposes include certain internal research, analytics, innovation, testing, monitoring, customer communication, risk management, and administrative purposes.
- **Conducting analytics**: When we conduct analytics, we process such data on the basis of our legitimate interest which is to enhance your experience and to develop and improve our Services.
- **Enforcing Terms**: To enforce our Terms of Use or this Privacy Policy, or agreements with third parties.
- **Merger or Acquisition**. To support a contemplated or actual reorganization of our business, in connection with financing, a sale, or some other transaction involving the disposal of all or part of our business or assets, including for the purpose of conducting due diligence in connection with such a transaction.

## WHERE WE REQUIRE CONSENT

In other cases our legal basis for processing your Personal Data is that you have provided consent. In those cases we will ask for your consent to process your Personal Data. You may indicate your consent in a number of ways, including, as permitted by law, by ticking a box (or an equivalent action) to indicate your consent when providing us with your Personal Data through our Services or a form (including enrolling in Promotions). The legal requirements for consent may differ across regions.

Generally, we will request your consent to process your Personal Data in the following circumstances:

- 1) When we collecting mobile device IDs, advertising IDs, and data from sensors (which may be captured at the operating system level). You can give or withdraw your consent for the collection of this type of data in the preferences settings of the Service or App. However, if you choose not to provide this information, certain features may be unavailable or not function properly.
- 2) When we contact you to determine your interest in participating in certain research initiatives and to share identifying results from research initiatives you have participated in.
- 3) When you input Wellbeing and Feeding Data and Interaction and Program Data within our Services.
- 4) When we collect precise Location Data.
- 5) When you communicate with us or sign up for promotional materials.

- 6) When you participate in special activities, offers, or programs, and doing so involves the use of Sensitive Data.
- 7) When you connect with us through social media.
- 8) When we leverage and/or collect cookies, device IDs, Location Data, data from the environment and other tracking technologies.
- 9) When you sign up for our services that consist of social sharing and communication with others.
- 10) When we provide you geographically relevant Services, offers, or advertising.
- 11) When we disclose Personal Data to our affiliates and partners, and to our service providers and vendors.
- 12) Transfer of Data to countries other than your country of residence.
- 13) To enable social sharing and connect with us on social media.

Despite the above, in some circumstances we may process your Personal Data for any of the above purposes without requesting or receiving your express consent. In these cases, the basis of our processing is any or all of the following:

- necessity in order to provide the Service;
- our legitimate interests; or
- implied consent by you, including but not limited to circumstances where it would be reasonable for you to expect that we would use your Personal Data for that purpose when you provide it to us.

In all circumstances, you are able to request that we do not use your Personal Data for any of the purposes set out above, in accordance with the 'Your Rights & Exercising Your Rights' section of this Privacy Policy

#### **LEGAL BASIS OF PROCESSING UNDER THE GDPR**

In order to comply with the requirements of the European General Data Protection Regulation (GDPR) for all our consumers and users, this Privacy Policy outlines the legal basis on which we process your Personal Data and provides other information required by the GDPR.

##### 1) HelpMe Feed as processor on behalf of health professionals

HelpMe Feed will store and process your Personal Data on behalf of health professionals who are users and who pay for the Application. For this processing, the health professional will act as the "**data controller**" within the meaning of the European Privacy Directive (1995/46) and is responsible for the lawful processing of your personal data.

Please refer to your health professional for information on the way the health professional will process your Personal Data. Whilst HelpMe Feed takes the protection of personal data very seriously, HelpMe Feed is not responsible for the compliance with applicable privacy laws in any jurisdiction by the health professional.

## 2) HelpMe Feed as controller

In certain circumstances HelpMe Feed may also process your Personal Data for its own purposes, in which case HelpMe Feed will be the “**data controller**” of your Personal Data within the meaning of the European Privacy Directive (1995/46) and is responsible for the lawful processing of this Personal Data. HelpMe Feed is the data controller for the processing of payments by health professionals, the processing of account information, and use of cookies.

## Withdrawing consent

You may at any time withdraw your consent with future effect. You can withdraw your consent by contacting us at [support@helpmefeed.org] at any time. Such withdrawal will not affect the lawfulness of any processing of your Personal Data which was collected prior to your withdrawal. You can exercise other controls regarding website and online data collection, interest-based advertising, your communication settings, and app preferences. Depending on the Services, collection and use of Personal Data may be required for the Services to work.

## Data Retention

We will retain your Personal Data for as long as you maintain an Account, or otherwise for as long as necessary to provide you the Services. We will also retain your Personal Data as long as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Where we no longer need to process your Personal Data for the purposes set out in this Privacy Policy, we will delete your Personal Data from our systems.

Where permissible, we will also delete your Personal Data upon your request. Information on how to make a deletion request can be found here.

If you have questions about our data retention practices, please contact us via email at support@helpmefeed.org.

## Your Rights & Exercising Your Rights

### If you elect not to provide Personal Data

You may choose not to provide HelpMe Feed with your Personal Data. However, if you choose not to provide your Personal Data, you may not be able to enjoy the full range of Services or use the Application.

### Your rights

You have certain rights in relation to your Personal Data, which may include:

- **Right of access:** the right to make a written request for details of your Personal Data and a copy of that Personal Data.

- **Right to rectification:** the right to have inaccurate information about you corrected or removed.
- **Right to erasure** ('right to be forgotten'): the right to have certain Personal Data about you erased.
- **Right to restriction of processing:** the right to request that your Personal Data is only used for restricted purposes.
- **Right to object:** the right to object to processing of your Personal Data unless our processing is based on the performance of a task carried out in the public interest or we have let you know the processing is necessary for our or a third party's legitimate interest. You can object to our use of your information for profiling purposes where it is in relation to direct marketing.
- **Right to data portability:** the right to ask for the Personal Data you have made available to us to be transferred to you or a third party in machine-readable formats.
- **Right to withdraw consent:** the right to withdraw any consent you have previously given us to handle your Personal Data. If you withdraw your consent, this will not affect the lawfulness of HelpMe Feed's use of your Personal Data prior to the withdrawal of your consent and we will let you know if we will no longer be able to provide you with your chosen product or service including the Application.
- **Right in relation to automated decisions:** you have the right not to be subject to a decision based solely on automated processing which produces legal effects concerning you or similarly significantly affects you, unless it is necessary for entering into a contract with you, it is authorised by law or you have given your explicit consent. We will let you know when such decisions are made, the lawful grounds we rely on and the rights you have.

All rights other than your right to object to the use of your Personal Data for direct marketing (and profiling to the extent used for the purposes of direct marketing) are not absolute. They may not apply in all cases, depending on, among other things, the laws applicable in your region. Although we will endeavor to uphold the rights set out in this section, we may not be able or legally compelled to do so in all circumstances.

Where you make a request to us in relation to any of the rights set out in this section, we will let you know how we will be able to comply with your request.

### **How to exercise your rights**

To exercise your rights to your Personal Data please contact us at [privacy@helpmefeed.org](mailto:privacy@helpmefeed.org) or at the address listed below. Subject to applicable law and in exceptional circumstances only, we may charge for this service. We will respond to reasonable requests as soon as practicable, and in any event, within the time limits prescribed by law.

If you make a request, we may ask you to confirm your identity if we need to, and to provide information that helps us to understand your request better. If we cannot meet your request, we will explain why.

Should you wish to raise a concern about our use of your Personal Data (and without prejudice to any other rights you may have), you have the right to do so with the applicable privacy authority in your region.

## Security

We implement appropriate technical and organizational safeguards to protect against unauthorized or unlawful processing, destruction, loss, alteration, disclosure, or access to or of Personal Data. Please be advised, however, that we cannot fully eliminate security risks associated with the storage and transmission of Personal Data.

You are responsible for maintaining the security of your Account to the best of your ability, including by using a complex password and regularly updating your password. You must notify us at [support@helpmefeed.org](mailto:support@helpmefeed.org) as soon as you become aware of any actual or suspected loss, theft, or unauthorized use of your account or account password. We are not responsible for any loss resulting from unauthorized use of your username and password if that unauthorized use was due to your failure to maintain the security of your Account.

**Links to Other Websites.** Please note that this Privacy Policy does not apply to the practices of companies that we do not own or control, or to people that we do not employ or manage. Our Services may provide a link or some other form of access to third party sites which we do not control (“**Third Party Sites**”). We provide these links merely for your convenience. We have no control over, do not review, and are not responsible for Third Party Sites, their content, or any goods or services available through the Third Party Sites. Our Privacy Policy does not apply to Third Party Sites, and any data you provide to Third Party Sites, you provide at your own risk. We encourage you to review the privacy policies of any Third Party Sites that you interact with.

## How to Contact Us

If you have any questions, comments, or concerns about how we handle your Personal Data, you may contact us through email at [support@helpmefeed.org](mailto:support@helpmefeed.org) or write to us at:

**HelpMe Feed Foundation Ltd**  
Attention: Privacy Office  
Level 1  
12 O’Connell Street  
Sydney NSW 2000  
Australia

If we are required under applicable law to appoint a data protection officer (DPO), you can contact the DPO that is responsible for your country/region at [[privacy@helpmefeed.org](mailto:privacy@helpmefeed.org)].

## Changes to this Privacy Policy

We may change this Privacy Policy from time to time in accordance with the applicable data protection laws. Please visit our Website for information on updates to this Privacy Policy.

## Country/Region-Specific Disclosures

### 1. Residents of California, United States of America

#### Your California Privacy Rights

California Civil Code Section 1798.83 permits California residents to request and obtain from us a list of what Personal Data (if any) we disclosed to third parties for that third party's direct marketing purposes in the preceding calendar year and the names and addresses of those third parties. Requests may be made only once a year and are free of charge.

Under Section 1798.83, we currently do not share any Personal Data with third parties for their direct marketing purposes. If we do decide to share your Personal Data with third parties for their marketing purposes, you may opt-out of this disclosure at any time by submitting a request to our [support team], or in writing to:

#### HelpMe Feed

Attention: Privacy Officer  
Level 1  
12 O'Connell Street  
Sydney NSW 2000  
Australia

It is important to note that this opt-out does not prohibit disclosures made for non-marketing purposes or for purposes of assisting us with our own marketing.

Additionally, if you are a registered user under the age of 18 and a resident of California, you may request removal of content you have posted to the Services. Requests can be made by email to [support@helpmefeed.org](mailto:support@helpmefeed.org). Please note that making such requests does not ensure complete or comprehensive removal of the content. For example, we may retain the information for our own internal records, and it is also possible that a third party we do not own or control may copy the posting and repost it elsewhere. We do not authorize third parties to collect your Personal Data when you use the App or any of the Services, except as expressly stated in this Privacy Policy. **TO THE FULLEST EXTENT PERMITTED BY LAW, WE ARE NOT RESPONSIBLE FOR, AND YOU HEREBY RELEASE US FROM, ANY AND ALL LIABILITY WHICH MAY ARISE FROM SUCH THIRD PARTIES' UNAUTHORIZED COLLECTION OF YOUR PERSONAL DATA.**

Last updated: May 2019