

Updated: 5th November 2025

Your privacy is important

This Privacy Policy outlines how we collect, hold, use, protect and disclose personal data that we obtain about you directly or indirectly in accordance with applicable data protection laws.

We are very aware of the sensitivity of some of the information that we process by virtue of the services we provide and take the security of your personal data very seriously. We appreciate that your privacy is very important, and we are strongly committed to handling your personal data (including your health information and any other sensitive information about you) in accordance with the Privacy Act 1988 (Cth), the Australian Privacy Principles, the General Data Protection Regulation (EU) 2016/679, the Data Protection Act 2018 (UK) and any other applicable data protection legislation as amended, replaced or superseded from time to time.

This website is not intended for use by children under the age of 18 years old ("minors"), and we will only collect data relating to minors with the consent of their parent or guardian. Where tests or services are requested by a parent or guardian on behalf of a minor, we will only process data relating to such child with parental or guardian consent.

It is important that you read this Privacy Policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements other notices and privacy policies and is not intended to override them.

Controller

Microba is made up of different legal entities, more information of which can be found here: https://microba.com/.

This Privacy Policy is issued on behalf of the Microba Group so when we mention "Microba", "we", "us" or "our" in this Privacy Policy, we are referring to the

relevant company in the Microba Group responsible for processing your data. We will let you know which entity will be the controller for your data when you purchase a product or service with us. Microba Pty Limited ABN 30 628 603 225 is the controller and responsible for this website.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Contact Details

If you have any questions about this Privacy Policy or our privacy practices, please contact our data privacy manager in the following ways:

Full name of legal entity: Microba Pty Limited ABN 30 628 603 225

Postal address: Level 10, 324 Queen Street, Brisbane, Queensland, 4000, Australia Quality Manager, Microba Pty Limited, GPO Box 469, Brisbane QLD 4001, Phone: 1300 974 621, e-mail address: privacy@microba.com.

Our contact details for our EU Representative are as follows:

EU Representative: Scheja & Partners GmbH & Co. KG

EU Representative Contact address: Adenauerallee 136, 53113 Bonn, Germany Tel: +49 228 227 226 0

Submit a privacy data request here: https://www.scheja-

partners.de/en/contact/contact.html

Our contact details for our UK Representative are as follows:

UK Representative: FAO DPO, Invivo Healthcare

UK Representative Contact Address: The Coach House, 3 Lewiston Mill, Toadsmoor Road, Brimscombe, Stroud, Gloucestershire, GL5 2TE



Tel: 0333 241 2997

Submit a privacy data request here: dpo@invivoclinical.co.uk

Third Party Links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. This Privacy Policy does not apply to, and Microba is not responsible for any third-party websites which may be accessible through links from this website (please see Online services - Links to third party sites, services and content section below for more information).

Scope of Privacy Policy

This Privacy Policy explains and describes:

- When this Privacy Policy applies.
- How we collect your personal data.
- Legal basis for usage of your personal data.
- How we use the personal data we collect.
- How and when we may disclose personal data that we collect.
- What happens if your personal data is transferred overseas.
- How long we hold your personal data.
- How we protect your personal data and keep it secure.
- What cookies are and how we use them.
- What happens when you access third-party services and content.
- Your legal choices and rights.
- The status of this Privacy Policy and any changes that are made to it.

When this Privacy Policy applies

This Privacy Policy applies:

- to your use of any of our services where we are performing a data controller function;
- where you apply to us for a job or work placement;
- to your supply of services to us where this involves any personal data; and/or
- to any personal information collected from third parties where we are the controller of such information.

This Privacy Policy additionally applies to our website and online services, including www.microba.com, discover.microba.com.

practitioner.metabiome.com.au,

healthcare.microba.com, co-biome.com, app.co-biome.com, order.co-biome.com, join.co-biome.com, education.co-biome.com and any other website, mobile app or other online service created or hosted by us from time to time on which this Privacy Policy appears (together, our "online services") through which we may collect certain details if, for example, you want to subscribe to newsletters, or tests and services offered by us.

Please note that our online services make use of cookies and similar technologies, as described in more detail in the Cookies section below.

Kinds of personal data we collect

'Personal data' means any information capable of identifying an individual. It does not include data where the identity has been removed (anonymised or de-identified data).

We collect and hold personal data about customers and potential customers, contractors, employees and other people who come into contact with us (**you** or **your**).

We may collect, use, hold, store, transfer and process different kinds of personal data about you, which we have grouped together as follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data includes billing address, delivery address, email address and telephone numbers.



- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- Technical Data includes internet protocol (IP)
 address, your login data, browser type and
 version, time zone setting and location, browser
 plug-in types and versions, operating system and
 platform, and other technology on the devices you
 use to access this website.
- Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- Special Categories of Personal Data includes
 details about your race or ethnicity, religious or
 philosophical beliefs, sex life, sexual orientation,
 political opinions, trade union membership,
 information about your health, and genetic and
 biometric data). Throughout all of our processing,
 specific attention is paid to all instances in which
 such special categories of personal data is
 processed as we have increased duties wherever
 such categories of data are provided to, or
 gathered by us.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly

identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

Failure to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

How we collect your personal data

We use different methods to collect data from and about you including through:

- Direct Interactions. We will generally collect personal data about you directly from you, including:
 - where you have submitted a microbiome request, responded to our online survey(s) or questionnaire(s), or provided us with samples;
 - by way of forms and other documents or information that you submit to us (whether in paper or electronic form), correspondence you provide to us and telephone calls or meetings with you;
 - when you communicate with us via email or other channels;
 - when you sign up for or request that we send you newsletters, alerts, or other materials;
 - when you sign up for a webinar or event; and
 - when you respond to our communications or requests for information.

The main exception to this is where the data subject is a minor, in which case we will collect the relevant data directly from their parent or guardian.

 Third parties or publicly available sources. We may collect information from other sources, such



as social media platforms that share information about how you interact with our social media content, and any information gathered through these channels will be governed by the privacy settings, policies, and/or procedures of the applicable social media platform, which we strongly encourage you to review.

We will handle any unsolicited information in accordance with law, including destroying or deidentifying such information where we are required to do so.

Automated technologies or interactions. When you use our online services, we may collect details of visits made to our online services including, but not limited to, the volume of traffic received, logs (including, where available, the IP address and location of the device connecting to the online services and other technical information and identifiers about the device and the nature of the visit) and the resources accessed.

If you apply for a job or work placement with **Microba**, you may need to provide information about your education, employment racial background and state of health. By submitting a job application with us including the relevant information, you acknowledge that you are providing your express consent to our use of this information to assess your application and to allow us to carry out both recruitment analytics and any monitoring activities which may be required of us under applicable law as an employer. In certain circumstances (e.g. where you are located, the type of information required to assess your application) you may separately be asked to provide your express consent. We may also carry out screening checks (including reference, background, directorship, financial probity, identity, eligibility to work, vocational suitability and criminal record checks) and consider you for other positions.

If you participate in any research study or studies that we conduct from time to time, then we will collect, hold and use personal data about you for the purposes of that research study and as described in our Participant Information Sheet.

How we use your personal data

Where we intend to use your personal data, we rely on the following legal grounds:

- Performance of a contract: We may need to
 collect and use your personal data to enter into a
 contract with you or to perform a contract that you
 have with us. For example, provision of a
 microbiome test ordered by or for you, and where
 we respond to your requests and provide you with
 services in accordance with our <u>Terms and</u>
 Conditions or other applicable terms of business
 agreed with you or with your employing
 organisation.
- Legitimate interests: Where we consider use of your information as being (a) non-detrimental to you, (b) within your reasonable expectations, and (c) necessary for our own, or a third party's legitimate purpose, we may use your personal data, which may include:
 - for our own direct marketing or continued communication;
 - the prevention of fraud;
 - our own internal administrative purposes;
 - personalisation of the service(s) we provide to you;
 - ensuring network and information security, including preventing unauthorised access to electronic communications networks and stopping damage to computer and electronic communication systems; and/or
 - reporting possible criminal acts or threats to public security to a competent authority.
- Compliance with a legal obligation: We may be required to process your information due to legal requirements, including employment laws, tax laws and other regulatory provisions applicable to Microba as a provider of Microbial Genomics Services.
- Consent: You may be asked to provide your consent in connection with certain services that we offer, for example in respect of any processing of your personal data for our marketing purposes where you or your employing organisation is not a



client of Microba, or in respect of certain special categories of personal data such as your health or racial background for which we are legally obliged to gain your consent due to the sensitive nature of such information and the circumstances in which it is gathered or transferred. Where we are reliant upon your consent, you may withdraw this at any time by contacting us in accordance with the Contact Us section above, however please note that we will no longer be able to provide you with the products or services that rely on having your consent. Where the data subject is a minor, any requisite consent will be obtained from their parent or guardian.

Purposes for which we use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To provide you with Microba's services (as noted above) that you or your employing organisation request.	(a) Identity (b) Contact (c) Transaction (d) Special Category	(a) Performance of a contract with you (b) Consent - in relation to Special Category Data
To respond to your enquiries.	(a) Identity (b) Contact (c) Profile Data (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how

		customers use our products/services)
To carry out our obligations or rights arising from any contracts entered into between you and us.	(a) Identity (b) Contact (c) Transaction (d) Financial (e) Special Category	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) (c) Consent - in relation to Special Category Data
To facilitate our internal business operations, including: to fulfil our legal or regulatory requirements; to administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)
To maintain and develop our relationship with you.	(a) Identity (b) Contact (c) Profile Data (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
For our business purposes, including data analysis, submitting invoices, detecting, preventing, and responding to actual or potential fraud, illegal activities, or intellectual property infringement.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Technical (f) Marketing and Communications	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to recover debts due to us) (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services) (d) Necessary for our legitimate interests for running



		our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)
To maintain and update our records including our database of contacts.	(a) Identity (b) Contact (c) Profile Data (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To provide you on an ongoing basis with information and services, including relevant marketing communications related to Microba, and other information or materials, that you request from us or which we feel may interest you where you have indicated that you would like to receive these from us.	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)
To evaluate, recruit, and hire personnel.	(a) Identity (b) Contact (c) Financial (d) Special Category	(a) Performance of an employment contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services) (d) Where we need to protect your interests (or someone else's interests) (e) In rare

To help us to improve our services, products or online services	(a) Technical (b) Usage	circumstances, where it is needed in the public interest or for official purposes (for example where we are required under a Court Order or a regulator) (f) Consent Necessary for our legitimate interests (to define types of customers for our products and services, to keep
		our website updated and relevant, to develop our business and to inform our marketing strategy)
To measure the popularity and effectiveness of services such as newsletters and seminar invitations, in order to improve what we offer to you and other recipients.	(a) Technical (b) Profile (c) Usage	(a) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services) (b) Necessary for our legitimate interests for running our business, provision of administration and IT services)
To ensure that content from our online services is presented in the most effective and secure manner for you and the device on which you are accessing our services, and to troubleshoot, and improve such online services.	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To allow you to use or access interactive features or secure areas of our online services, when you choose to do so.	(a) Technical (b) Profile (c) Usage	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to keep our website updated and relevant, to develop our business and to



		inform our marketing strategy)
For research, planning, service development, security or risk management.	(a) Technical (b) Profile (c) Usage	(a) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services) (b) Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)
As we believe reasonably necessary or appropriate to: comply with our legal obligations; respond to legal process or requests for information issued by government authorities or other third parties; or protect your, our, or others' rights.	(a) Identity (b) Contact (c) Financial (d) Special Category	(a) Necessary to comply with a legal obligation (b) In rare circumstances, where it is needed in the public interest or for official purposes (for example where we are required under a Court Order or a regulator)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us, or purchased goods or services from us, and you have not opted out

of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time, or unsubscribe options within email newsletters we might send you.

Where you opt-out of receiving these marketing messages, this will not apply to the personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosure of personal data

- We may share your personal data with the parties set out below for the purposes set out in the table in "How we use your personal data" section above.
- Internal Third Parties. In providing our services and operating our business, acting as joint controllers or processors, we may allow access to your personal data to the other companies within



Microba's group for our internal administrative purposes such as billing, promoting our events and services, and providing you or your organisation with services, provided in all instances that such processing is consistent with the legal basis for usage of personal data above and applicable law. Such other companies in the Microba group are based in Australia and The United States of America.

External Third Parties.

- Service providers acting as processors based in Australian and The United States of America who provide IT, customer communication and system administration services.
- Postal Services acting as processors based in Australia who provide certain personal data you provide us (such as your email address, phone number and/or residential address) in connection with us providing our services to you (this information may be used by Postal Services for the purposes of providing notification of tracking events and collecting any relevant feedback in relation to the delivery or tracking service).
- Professional advisers acting as processors including lawyers, bankers, auditors and insurers based in the UK, The United States of America and Australia who provide consultancy, banking and payment, legal, insurance and accounting services.
- Third party service providers, based in the UK,
 The United States of America and Australia who provide marketing, communications,
 CRM and website hosting services.

We may also provide anonymous statistical information about users of our websites and related usage information to reputable third parties, including analytics and search engine providers.

We own the database rights in the information collected via our online services. We do not sell, rent, or otherwise share information that reasonably identifies you or your organisation with unaffiliated

entities for their independent use except as expressly described in this Privacy Policy or with your express prior permission.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

If we are required to pass your sensitive personal data onto a third party we will only do so once we have obtained your explicit consent, unless we are legally required to do otherwise. Where the data subject is a minor, the requisite consent will be obtained from their parent or guardian.

We may share information that does not identify you or your organisation as permitted by applicable law.

International transfers

For individuals in Australia, we do not typically or routinely disclose personal data to recipients located outside of Australia, although this may change over time. We will only disclose your personal information to recipients located outside of Australia where we have taken reasonable steps to ensure that the recipient has adequate safeguards in place to protect your personal data and ensure your privacy rights continue to be protected.

For individuals in the European Economic Area (**EEA**), we may transfer your personal data to recipients located outside of the EEA. Where your personal data is transferred to a third party outside of the EEA, we put certain safeguards are in place to ensure your data is subject to a similar degree of security to the provisions of the EU General Data Protection Regulations. As such:

- we may transfer such of your personal data to countries that have been approved as providing an adequate level of protection for such data by the European Commission; or
- where we use certain service providers who are established outside of the EEA, we may use



specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give your personal data the same protection it has under the General Data Protection Regulations; or

 if we use US-based providers that are part of a valid and current EU-US Privacy Shield, we may transfer such of your personal data to them, as they have equivalent safeguards in place. Where no EU-US Privacy Shield is in place we will only transfer to US providers in accordance with the foregoing provisions of this section.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data internationally.

Referrals from Health Professionals

We may enter referral arrangements with certain third parties that provide health-related services to their patients or clients ("Health Professionals"). Under these arrangements, the Health Professional will make arrangements for you to access our services and that Health Professional will be responsible for obtaining your (or, if you are a minor or other individual lacking the requisite legal capacity, the your legal representative's) explicit consent to the use of your personal data in connection with the provision of our services.

In other instances, you may purchase our services directly from us (whether on referral from a Health Professional or otherwise). In these cases, we will request that you acknowledge consent and agree (or, where applicable, that your legal representative acknowledges, consents and agrees), that:

a) we may disclose the Patient Report produced with respect to those services (if any), including the personal data contained in the Patient Report, to the Health Professional that referred you (if any) and any of their associates or contractors that might be involved in providing health-related services to you (each, an "Authorised Health Professional");

b) we may send the Patient Report via email to the relevant Authorised Health Professional or allow them to view the Patient Report online; and

c) we and our personnel may hold, access and use the Patient Report for the purposes of facilitating the delivery of the Patient Report to the relevant Authorised Health Professional, and assisting them to interpret the Patient Report, in accordance with our Terms and Conditions and this Privacy Policy.

How we hold personal data and data security

We may hold personal data in different ways, including in paper form, electronic form and/or in other mediums.

Our information security is supported by a variety of processes and procedures, and we store information in access-controlled premises or electronic databases requiring logins and passwords. All employees, officers or contractors of Microba and third-party providers with access to confidential information are subject to access controls and confidentiality obligations, and we require our third-party data storage providers to comply with appropriate information security industry standards.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

Once we have received your information, we will take reasonable steps to use procedures and security features to try to prevent unauthorised access, modification or disclosure.

You can help us to keep your information secure by ensuring that any username or password in relation to our online services is kept strictly personal to you and not made available to any other person. You should stop using your username and password and notify us immediately if you suspect that someone else may be using your user details or password.

We have put in place procedures to deal with any



suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Retention

We will only retain personal data only as long as necessary to fulfil the purpose it was collected for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see the "your legal rights" section below for further information.

A maintained copy of our Retention and Disposal policy is available upon request. Should you wish to review our retention policy then please contact us in accordance with our contact details above.

De-identified information

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Our de-identification procedure involves:

removing personal identifiers;

- removing or altering other information that may allow you to be identified; and
- continuously assessing and managing the risk of re-identification.

Cookies

A cookie is a data file that a website transfers to your computer when you visit that website. This enables the website to track the pages you have visited. A cookie only contains information you supply. It cannot read data on your computer. There are many types of cookies that may be used for different purposes. For example, some cookies help a website to remember information about your visit, like your preferred language and other settings while others may identify which pages are being visited or offer security features.

Our website and services delivered online use cookies and other similar technologies, for example, to distinguish you from other users when you browse our website(s) or use our online services and to allow us to improve our online services. We may, for example, collect information about the type of device you use to access our online services, the operating system and version, your IP address, your general geographic location as indicated by your IP address, your browser type, the content you view and features you access on our online services, the web pages you view immediately before and after you access our online services, whether and how you interact with content available on our online services, and the search terms you enter on our online services.

Microba's website sets cookies which remain on your computer for differing times. Some expire at the end of each session and some remain for longer so that when you return to our website, you will have a better user experience. The cookies and technologies used by us are below:

Name	Туре	Description	Expiry
stripe_mid	Cookie	Used by Google Analytics to store and count pageviews.	2 years
stripe_sid	Cookie	To provide fraud prevention on Stripe	30 mins



		(payment processor)	
_ga	Cookie	Registers a unique ID that is used to generate statistical data on how the visitor uses the website	2 years
_ga	Cookie	Used by Google Analytics to store and count pageviews.	1 day
_gat	Cookie	Used by Google Analytics to throttle request rate	1 day
_gcl_au	Cookie	To provide user relevant content on LinkedIn partner network	Expires after session
_gid	Cookie	Registers a unique ID that is used to generate statistical data on how the visitor uses the website	1 day
_gid	Cookie	This cookie is set due to Twitter integration and sharing capabilities for the social media.	Persistent until removed
_hjAbsolute SessionIn Progress	Cookie	This cookie is used to count how many times a website has been visited by different visitors - this is done by assigning the visitor an ID, so the visitor does not get registered twice	1 day
_hjFirstSeen	Cookie	This cookie is used to determine if the visitor has visited the website before, or if it is a new visitor on the website	1 day
_hjIncludedIn Pageview Sample	Cookie	Used to detect whether the user navigation and interactions are included in the website's data analytics	1 day
hjSession #	Cookie	Collects statistics on the visitor's visits to the website, such as	1 day

		the number of visits, average time spent on the website and what pages have been read	
hjSession User#	Cookie	Collects statistics on the visitor's visits to the website, such as the number of visits, average time spent on the website and what pages have been read	1 day
Analytics SyncHistory	Cookie	Used in connection with data- synchronization with third-party analysis service	29 days
bcookie	Cookie	Used by the social networking service, LinkedIn, for tracking the use of embedded services	2 years
bscookie	Cookie	Used by the social networking service, LinkedIn, for tracking the use of embedded services	2 years
CONSENT	Cookie	Used to detect if the visitor has accepted the marketing category in the cookie banner	2 years
Ct0	Cookie	Twitter	7 days
external_refe rer	Cookie	Twitter	3 hours
Full Story	Tracking code – javascript	To provide user relevant content off-site (on twitter platform)	Expires after session
Google Maps API	Script	To track a user's behaviour on page and in-session	Expires after session
Google Tag Manager	Tracking code – javascript	Website visitor analytics for Rudder Stack	Expires after session
gt	Cookie	Twitter	2 years
guest_id	Cookie	This cookie is set by Twitter for advertising and to identify and track the website visitor.	2 years
guest_id _ads	Cookie	Collects information on user behaviour	2 years



		on multiple websites. This information is used in order to optimize the relevance of advertisement on the website	
guest_id_ marketing	Cookie	Unclassified	2 years
Intercom.io	Tracking code – javascript	To store if user has previously accepted the report disclaimer on the device	83 days
lang	Cookie	Remembers the user's selected language version	lang
lang	Cookie	Set by LinkedIn when a webpage contains an embedded "Follow us" panel	Expires after session
li_gc	Cookie	Stores the user's cookie consent state for the current domain	2 years
lide	Cookie	Used by the social networking service, LinkedIn, for tracking the use of embedded services	1 day
LinkedIn Ads	Tracking code – javascript	Website visitor analytics for Wordpress.com	Expires after session
personalizati on _id	Cookie	To store and track conversions on Google Adsense	Persistent until removed
report Disclaimer	Cookie	To provide fraud prevention on Stripe (payment processor)	6 months
rl_anonymou s _id	Cookie	Group ID for user, for Rudder Stack implementation	6 months
rl_group_id	Cookie	Group trait for user, for Rudder Stack implementation	6 months
rl_group_trait	Cookie	To store referring website for Rudder Stack implementation	6 months
rl_page_ init_referrer	Cookie	To store referring website for Rudder Stack implementation	6 months
rl_page_	Cookie	To store actions	6 months

init_referring _domain		performed on website for Rudder Stack implementation	
rl_trait	Cookie	To store a unique user ID for Rudder Stack implementation	6 months
rl_user_id	Cookie	To enable the user to be placed on Google Map	Expires immediately
Rudder Labs API	Tracking code – javascript	Anonymous user ID for Rudder Stack implementation	6 months
Twitter Ads	Tracking code – javascript	To provide user chat messaging for support	Session
UserMatch History	Cookie	Ensures visitor browsing -security by preventing cross- site request forgery. This cookie is essential for the security of the website and visitor	29 days
VISITOR_ INFO1_ LIVE	Cookie	Tries to estimate the users' band width on pages with integrated YouTube videos	179 days
WP.com stats	Tracking code – javascript	Website visitor analytics for Google Tag Manager	Expires after session
YSC	Cookie	Registers a unique ID to keep statistics of what videos from YouTube the user has seen	Expires after session
yt.innertube:: nextId	Cookie	Registers a unique ID to keep statistics of what videos from YouTube the user has seen	Persistent until removed
yt.innertube:: requests	Cookie	Registers a unique ID to keep statistics of what videos from YouTube the user has seen	Persistent until removed
ytidb::LAST_ RESULT_ ENTRY_KEY	Cookie	Stores the user's video player preferences using embedded YouTube video	Persistent until removed
yt-remote-	Cookie	Stores the user's	Expires after



cast- available		video player preferences using embedded YouTube video	session
yt-remote- connected- devices	Cookie	Stores the user's video player preferences using embedded YouTube video	Persistent until removed
yt-remote- device-id	Cookie	Stores the user's video player preferences using embedded YouTube video	Persistent until removed
yt-remote- fast -check- period	Cookie	Stores the user's video player preferences using embedded YouTube video	Expires after session
yt-remote- session-app	Cookie	Stores the user's video player preferences using embedded YouTube video	Expires after session
yt-remote- session- name	Cookie	Stores the user's video player preferences using embedded YouTube video	Expires after session

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Control of cookies

You can set your browser to refuse cookies through the browser settings, however, this may mean you are unable to take full advantage of our website or our services. Most browsers enable you to block cookies or to block cookies from particular sites. Browsers can also help you to delete cookies when you close your browser. You should note however, that this may mean that any opt-outs or preferences you set on our website will be lost. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org which includes information on how to manage your settings for the major browser providers.

Online Services – Links to third party sites, services and content

In addition to our online services, which we control directly, we also use and provide links to websites which are controlled by third parties, which may include:

- Twitter, LinkedIn and YouTube, where we have certain Microba accounts and profiles.
- Facebook and Instagram, where we have a social page.
- Google

If you use or follow a link to any of these third-party websites, please be aware that these websites have their own privacy policies and that we cannot accept any responsibility for their use of information about you.

Our online services may include integrated content or links to content provided by third parties (such as video materials). This Privacy Policy does not address the privacy, security, or other practices of the third parties that provide such content.

We engage third parties that support the operation of our online services, such as analytics providers and technologies. These third parties may use technologies to track your online activities over time and across different websites and online platforms. Please see Cookies section above for more information.

Your Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data, including the right to:

- request access to your personal data
 (commonly known as a "data subject access
 request"). This enables you to receive a copy of
 the personal data that we hold about you and to
 check that we are lawfully processing it.
- request correction of your personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you



corrected, though we may need to verify the accuracy of the new data you provide to us.

- enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local laws. Please note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground, as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- request restriction of processing your personal data.

This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- request transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- withdraw consent where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us using the contact details section above.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

How to make a complaint about a



breach of your privacy rights by us

You have the right to make a complaint at any time, we would, however, appreciate the chance to deal with your concerns before you approach the relevant authority (as below) so please contact us in the first instance.

If you wish to make a complaint, please contact us using the details at the beginning of this Privacy Policy and we will take reasonable steps to investigate the complaint and respond to you.

For individuals in Australia, you may submit a complaint to the Office of the Australian Information Commissioner, details of which can be found at https://www.oaic.gov.au/about-us/contact-us/.

For individuals in the European Economic Area (EEA), you may submit a complaint to the European Data Protection Supervisor, details of which can be found at https://edps.europa.eu/data-protection/our-role-supervisor/complaints en.

For individuals in the UK, you may submit a complaint to the Information Commissioners Office, details of which can be found at https://ico.org.uk/global/contact-us

If you make a privacy complaint, we will respond to let you know how your complaint will be handled. We may ask you for further details, consult with other parties and keep records regarding your complaint.

Changes to this Privacy Policy

Your provision of personal data to us or use of our services constitutes your acceptance of the terms of this Privacy Policy.

We keep our Privacy Policy under regular review take account of new laws, information governance practices and technology developments, as data privacy laws (and surrounding guidance) evolve, as our functions and activities change, and to ensure it remains appropriate. We recommend you visit our website regularly to keep up to date with any changes.

This version was last updated on the date stated at the beginning of it.

We will post any Privacy Policy changes on this page and, if the changes are significant or may materially impact upon your rights, we will provide a more prominent notice or contact you by other means (including, for certain services, email notification of Privacy Policy changes).