

Keiko Privacy Policy

Last updated: 17 July 2025

Keiko Pty Ltd ("Keiko", "we", "us", or "our") operates the Keiko website administration platform and mobile applications ("Platform"). We are committed to protecting your privacy and handling your personal information in accordance with applicable laws, including the Australian Privacy Act 1988 (Cth) and, where applicable, the EU General Data Protection Regulation (GDPR).

1. Scope and Acceptance By accessing or using the Platform, you consent to the collection, use, disclosure, and storage of your personal information as described in this Privacy Policy.

2. Information We Collect

2.1 Account Registration:

- Name, email address, phone number, date of birth (optional), and role (Administrator or Member).

2.2 Billing Information:

- Payment card details or third-party payment provider identifiers (processed via PCI-compliant gateways).

2.3 Platform Usage:

- Login times, IP addresses, device identifiers, browser type, and activity logs for security and analytics.

2.4 Health & Consent Data (Member Profile):

- Emergency contact details, medical conditions, and consent forms (provided voluntarily by Members or Administrators).

2.5 Communications:

- Correspondence through support tickets, email, in-app chat, and feedback or survey responses.

3. How We Use Your Information

- **Provide & Improve Services:** Operate, maintain, and enhance the Platform, including personalized features and notifications.
- **Billing & Administration:** Process payments, send invoices, and manage subscriptions.
- **Security & Fraud Prevention:** Detect and prevent unauthorized access, abuse, or illegal activity.
- **Customer Support:** Respond to inquiries and troubleshoot issues.
- **Compliance:** Fulfill legal obligations (e.g., tax reporting, data retention requirements).
- **Marketing & Communications:** Send service-related announcements, newsletters, and promotions (where you've opted-in).

4. Legal Basis for Processing (GDPR)

For EU users, we rely on the following legal grounds:

- **Contract:** Processing is necessary to perform our contract with you.
- **Consent:** You have given clear consent for specific purposes (e.g., marketing emails).
- **Legal Obligation:** To comply with laws (e.g., tax, accounting).
- **Legitimate Interests:** For platform security, fraud prevention, and product improvement, balanced against your rights.

5. Sharing and Disclosing Information

5.1 **Service Providers:** We may share data with third-party vendors (e.g., hosting, payment processors, analytics) under confidentiality agreements.

5.2 **Affiliates & Subsidiaries:** Within the Keiko corporate family for operational purposes.

5.3 **Legal Requirements:** To comply with subpoenas, court orders, or legal processes.

5.4 **Business Transfers:** In connection with mergers, acquisitions, or sale of assets, with notice and contractual protections.

6. Data Retention

We retain personal information as long as necessary for the purposes outlined, including:

- Active Account information: duration of your account plus 7 years for tax compliance.
- Support tickets and communications: 3 years.
- Anonymized analytics data: indefinitely.

7. International Data Transfers

Your data may be stored and processed outside Australia (e.g., in AWS or other cloud regions). We implement standard contractual clauses and safeguards to ensure adequate protection.

8. Your Rights

8.1 **Access & Correction:** Request a copy of or update your personal data.

8.2 **Erasure ("Right to be Forgotten"):** Request deletion of your data, subject to legal retention obligations.

8.3 **Portability:** Obtain a machine-readable copy of your data.

8.4 **Restriction & Objection:** Limit or object to specific processing activities (e.g., marketing).

8.5 **Withdraw Consent:** Withdraw consent for processing activities based solely on consent.

To exercise rights, contact us as per Section 12.

9. Cookies and Tracking Technologies

We use cookies, web beacons, and similar technologies for:

- Essential functionality (login, security).
- Analytics (Google Analytics, Matomo).
- Marketing (Facebook Pixel, email trackers) with opt-out options.

Manage cookie preferences via your browser settings or our cookie banner.

10. Security Measures

We implement technical and organizational measures, including encryption at rest and in transit (TLS), access controls, regular audits, and staff training to protect your data.

11. Children's Privacy

Our Platform is not directed at individuals under 13 (or higher age threshold in your jurisdiction). We do not knowingly collect data from children. If discovered, we will delete such data.

12. Contact Us

For questions, requests, or complaints about this Privacy Policy or our data practices, please contact:

Privacy Officer Keiko Pty Ltd Level X, Example Street Melbourne VIC 3000, Australia Email: privacy@keiko.com.au Phone: +61 3 1234 5678

13. Changes to This Policy

We may update this Privacy Policy. We will notify via the Platform and update the "Last updated" date. Continued use following revisions constitutes acceptance.

Keiko – Empowering Martial Arts Clubs Worldwide