**Privacy Policy - What’s Changed**

**February 2022**

Our Privacy Policy has been updated to accommodate the personal data processing associated with our new ‘PartnerVantage’ Program, including via the Program-related platform at partners.megaport.com (known as ‘VantageHub’), and our new recruitment system. We’ve also taken the opportunity to update certain terminology for clarity.

So, aside from minor consequential edits related to the new terminology, the changes to note are as follows:

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| **Clause reference** | **What’s changed** |
| Preamble | We’ve included a list of terminology and have adopted such terminology throughout the Policy to reduce any ambiguity or uncertainty. However, regardless of any new terminology, the only new concept being introduced is that of a ‘Partner’ in our Program. |
| Part 1 – Customers | In relation to ‘How we collect it’, we’ve clarified that we may also do so via our referral/sales Agents and, for prospective Customers, via the operators of third-party websites on which we’ve placed our content (subject to the notice and consent requirements of privacy- and direct marketing laws) |
| Part 2 - Recruitment | Clarified that, although the candidate’s provision of any sensitive data would be entirely voluntary, data relating to race, gender and veteran status (if provided) may be used for statutorily-required aggregated reporting in specific jurisdictions where relevant. We’ve also made specific mention of our recruitment system as a collection and storage method. |
| Part 3 – Website visitors | We’ve included express reference to VantageHub as being one of our Websites and incorporated a link to its cookie information (with consequential updates having been made to the ‘Data Controller’ section).  |
| Part 4 – Vendors  | We’ve included specific reference to our ‘Agents’ along with the fact that we may collect some of their personal data via VantageHub and their own Portal accounts (if applicable to them)  |
| Part 5 – PartnerVantage Program  | **New section dealing with our PartnerVantage Program**.  |
| Part 6 – General – How to access and correct your personal data | For Agents with Portal accounts, we’ve stated that they too can update some of their information directly via their Portal accounts.  |