

Cookie Policy

Gibble SaaS Platform

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Leftorium Pty Ltd

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Trading as **Gibble** - gibble.com.au

Leftorium Pty Ltd (Trading as Gibble) Cookie Policy

Last updated: July 2025

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1. About this Cookie Policy

1.1 This Cookie Policy explains how Leftorium Pty Ltd, trading as Gibble ("we," "us," or "our"), uses cookies and similar technologies on our website (www.gibble.com.au) and online platforms, including our learning, payroll, student management, and human resources management platforms (collectively, "Services"). It applies to all users, including corporate customers, their personnel, end users, and other visitors.

1.2 We are committed to transparency in our use of cookies and compliance with applicable data protection laws, including the Australian Privacy Principles (APPs) under the *Privacy Act 1988* (Cth), the EU General Data Protection Regulation 2016/679 (GDPR), and the *Privacy Act 2020* (New Zealand).

1.3 For inquiries about this Cookie Policy, contact our Privacy Representative and Data Protection Officer at:

- **Email:** privacy@gibble.com.au
- **Address:** Level 2, Suite 204, 189E South Centre Rd, Tullamarine VIC 3043, Australia
- **Phone:** +61 3 9744 2887

1.4 We may update this Cookie Policy to reflect changes in our practices or legal requirements. Updates will be posted at www.gibble.com.au/cookies, with significant changes communicated via email, website banners, or platform notifications.

2. What Are Cookies and Similar Technologies?

2.1 Cookies are small text files stored on your device (e.g., computer, tablet, or smartphone) when you visit our website or use our Services. They help us enhance functionality, improve user experience, and analyze usage patterns.

2.2 We also use similar technologies, such as web beacons, pixels, and local storage, to collect information about your interactions with our Services.

2.3 Cookies may be:

- **Session Cookies:** Temporary and deleted when you close your browser.
- **Persistent Cookies:** Remain on your device until they expire or are manually deleted.
- **First-Party Cookies:** Set by us to operate our Services.
- **Third-Party Cookies:** Set by third-party providers (e.g., Google Analytics) for analytics or functionality.

3. How We Use Cookies

3.1 We use cookies and similar technologies for the following purposes:

1. **Essential Cookies:** Enable core functionality, such as user authentication, session management, and platform security. These are necessary for our Services to operate and cannot be disabled.

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2. **Performance and Analytics Cookies:** Collect de-identified data (e.g., user location, device type, time spent on platforms, navigation paths) to improve performance, troubleshoot issues, and conduct statistical analysis. We use Google Analytics for this purpose (see Section 6).
3. **Functional Cookies:** Enhance user experience by remembering preferences (e.g., language settings) and enabling features like personalized content.
4. **Marketing Cookies:** Support promotional activities, such as targeted advertising or tracking engagement with marketing campaigns, with your consent.

3.2 All analytics data collected via cookies is de-identified and cannot reasonably identify an individual. We use this data to:

- Review and enhance our Services.
- Develop case studies and marketing materials without identifying users.

4. Types of Cookies We Use

4.1 Below is a summary of the cookies and similar technologies we use:

Category	Purpose	Examples	Duration
Essential	Enable login, session management, and security features (e.g., role-based access, multi-factor authentication).	Session ID cookies, authentication tokens	Session or up to 30 days
Performance/Analytics	Track platform usage (e.g., page views, time spent, navigation paths) via Google Analytics.	_ga, _gid, _gat	Up to 2 years
Functional	Remember user preferences (e.g., language, region) and enable location-based services (e.g., Ready People App).	Preference cookies, geolocation settings	Up to 1 year
Marketing	Support promotional campaigns and track ad performance.	Third-party ad network cookies	Up to 1 year

5. User Consent

5.1 By using our Services, you consent to the use of essential cookies, which are necessary for operation. For non-essential cookies (performance, functional, and marketing), we obtain your explicit consent via a cookie banner on our website or platform settings.

5.2 For users in the EU, UK, and other regions requiring consent under GDPR or equivalent laws (e.g., Singapore's PDPA), we ensure compliance by:

- Displaying a clear cookie banner on first visit, detailing cookie types and purposes.

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- Allowing you to accept or reject non-essential cookies.
- Providing ongoing access to cookie preferences via www.gibble.com.au/cookies.

5.3 You may withdraw consent for non-essential cookies at any time (see Section 7).

6. Third-Party Cookies

6.1 We use third-party services, such as Google Analytics, to collect de-identified analytics data. Google Analytics cookies (_ga, _gid, _gat) track usage patterns to help us improve our Services. For details on how Google uses data, visit [Google's Privacy Policy](https://policies.google.com/privacy).

6.2 Other third-party cookies may be used for marketing or integration with customer systems (e.g., CRM platforms like Salesforce). These are disclosed in our Privacy Policy at www.gibble.com.au/privacy.

6.3 We ensure third-party providers comply with applicable data protection laws and do not use cookies to collect identifiable personal information without consent.

7. Managing Cookie Preferences

7.1 You can manage cookies through:

- **Cookie Banner:** Accept or reject non-essential cookies on your first visit.
- **Platform Settings:** Adjust preferences in your account settings (where available).
- **Browser Settings:** Block or delete cookies via your browser. Instructions vary by browser:
 - [Google Chrome](#)
 - [Mozilla Firefox](#)
 - [Safari](#)
 - [Microsoft Edge](#)
- **Device Settings:** Disable location-based cookies via mobile device privacy settings.

7.2 Disabling non-essential cookies may limit functionality, such as personalized features or location-based services. Essential cookies cannot be disabled as they are required for our Services to function.

8. Data Security

8.1 We protect data collected via cookies using industry-standard measures aligned with ISO 27001, including:

- AES-256 encryption for data at rest and TLS 1.3 for data in transit.
- Regular security testing and vulnerability assessments.
- Access controls and multi-factor authentication.

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8.2 For full details, refer to Section 9 of our Privacy Policy at www.gibble.com.au/privacy.

9. International Compliance

9.1 We comply with cookie-related regulations in all operating regions, including:

- **Australia:** APPs under the *Privacy Act 1988* (Cth).
- **EU/UK:** GDPR and ePrivacy Directive, requiring explicit consent for non-essential cookies.
- **New Zealand:** *Privacy Act 2020*, ensuring lawful data collection.
- **Singapore:** Personal Data Protection Act (PDPA).
- **USA:** Compliance with state laws (e.g., CCPA/CPRA for California residents).
- **Japan:** Act on the Protection of Personal Information (APPI).

9.2 Data collected via cookies may be transferred to third-party providers in Australia, New Zealand, Canada, the UK, Singapore, USA, or Japan, with safeguards like Standard Contractual Clauses for GDPR-covered data.

10. Contact Us

10.1 For questions or concerns about our use of cookies, contact our Privacy Representative at privacy@gibble.com.au.

10.2 Complaints can be escalated to:

- **Australia:** Office of the Australian Information Commissioner, enquiries@oaic.gov.au, 1300 363 992.
- **New Zealand:** Office of the Privacy Commissioner, enquiries@privacy.org.nz.
- **EU:** Relevant supervisory authority (e.g., ICO in the UK).
- **Singapore:** Personal Data Protection Commission, info@pdpc.gov.sg.
- **USA:** Relevant state authority (e.g., California Attorney General).
- **Japan:** Personal Information Protection Commission, info@ppc.go.jp.