



## PRIVACY POLICY

### 1. PRIVACY PRINCIPLES

- 1.1 Safe T Card Australia Pty Ltd ACN 160 069 287 ("we", "our", "us") are committed to maintaining the privacy and confidentiality of personal information. We believe that the responsible use of personal information collected is critical to our business objectives and reputation.
- 1.2 We have elected to be subject to the Commonwealth *Privacy Act 1988* and accordingly will adhere to the Australian Privacy Principles (APPs) when collecting, using, disclosing, securing and providing access to personal information.
- 1.3 As part of our commitment to privacy, we have adopted this Privacy Policy which deals with the management of personal information.
- 1.4 We will only collect, use or disclose personal information in accordance with the *Privacy Act 1988* and this Privacy Policy.
- 1.5 If you:
- (a) are from a country that is part of the European Union;
  - (b) have a business that has an establishment in the European Union;
  - (c) are disclosing Personal Information for someone who is from the European Union; or
- then we will follow the European Union's *General Data Protection Regulations 2016/679* to the extent they impose certain rights and obligations that the Australian Privacy Principles do not impose.
- 1.6 The contents of this Privacy Policy are subject to change and are not intended to create a contract between us and any individual or entity that provides us with personal information.

### 2. PERSONAL INFORMATION COLLECTION

- 2.1 Personal information is any information, including any opinion, about an identified individual, or an individual who is reasonably identifiable:
- (a) whether the information or opinion is true or not; and
  - (b) whether the information or opinion is recorded in material form or not.
- 2.2 Sensitive Information is personal information, which is given a greater level of protection under the Australian Privacy Principles, such as information about your health, criminal records, your religious beliefs or affiliations or political opinions. We only collect such information where we are permitted to do so under the Australian Privacy Principles and if such information is necessary to provide our services to you or where we are required to collect this information by law.
- 2.3 We may invite you to provide information about yourself so that we are able to provide our services to you.
- 2.4 The extent and type of personal information we receive from you depends on the information you provide to us through our website, apps, email or telephone, face to face dealings and/or when you request services.



- 2.5 In order for us to provide you with our services or otherwise to deal with you we generally require your name, address, contact details and direct debit bank or credit card details. The type and amount of information necessary will vary depending on the services you require.
- 2.6 Where it is lawful and reasonable to do so, you can remain anonymous or use a pseudonym if you wish, however it may reduce the type and quality of services we will be able to provide.
- 2.7 If you elect to not provide us with certain personal information about you, we may not be able to provide you with specific products, services and assistance (to the extent that they require us to collect, use or disclose personal information).

### **3. USE AND DISCLOSURE OF PERSONAL INFORMATION**

- 3.1 We use the personal information which you provide to deliver the services most suited to your needs.
- 3.2 We use your personal information to respond to your requests, to provide you with information about our products and services, to communicate with you, to provide any of our services, to administer and manage those services (including billing), to gather feedback and to comply with any legal obligations. For example, if you send us an e-mail message requesting information about us, we will use your e-mail address and other information you supply to respond to your request.
- 3.3 We may display certain details such as your name and actions you take on a file we hold on your behalf.
- 3.4 The personal information you provide to us will be retained only for as long as necessary to fulfil the purposes for which the information was collected or as required by law.
- 3.5 We do not share personal information with third parties except as set out below or otherwise as necessary to provide our services or as required by law or other legal processes, and we never sell your personal information.
- 3.6 The third party people/organisations to which we disclose your personal information may include, our staff members, contractors, related entities and outsourced service providers who manage the services we provide to you (including Valour Security Services Pty Ltd, Reef Industries Pty Ltd and Advance It Group Limited), your authorised representatives, our professional advisers (including our accountants and auditors), insurers, government and regulatory authorities and other similar organisations including the police, and entities as required or authorised by law. Some third parties to whom we disclose your personal information to may be located outside of Australia.
- 3.7 If you access our services as an employee or contractor of a master account holder then we will disclose your personal information to that master account holder or any third party authorised to operate the master account.
- 3.8 We may disclose your personal information to external national or overseas facilities in the course of conducting information and data processing, back up and scanning, or for the purposes of obtaining other services from third parties.
- 3.9 Information you enter when making a purchase will be shared with payment processors, financial gateways, and your credit card company to authorize credit card payments. Such information may also be shared with necessary third parties solely for the purpose or carrying out the transactions.
- 3.10 Personal information collected by us may be transferred to our subsidiaries or related entities where it is necessary to meet the purpose for which you have submitted the information. By submitting data to us electronically, you are providing explicit consent to trans-border transmission of data collected.



#### **4. DATA ACCESS AND QUALITY**

- 4.1 We take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up-to-date.
- 4.2 You can request access to the personal information we hold about you if you wish to do so. If we are unable to provide you with access, we will explain why. We reserve our rights to charge a fee for searching for and providing access to your information.
- 4.3 You can contact us at any time to update your information and we recommend you do so as and when required. You can also advise us of changes by e-mail, telephone or letter using the details on our website.

#### **5. COOKIES**

- 5.1 "Cookies" (small text files placed on your computer when you first visit our website) may be used on some parts of our website. Most browsers now recognise when a cookie is offered and permit you to refuse or accept it. If you are not sure whether your browser has this capability, you should check with the software manufacturer, your company's technology help desk or your internet service provider.
- 5.2 Cookies are primarily used to enhance your online experience and are not used to track the navigational habits of identified visitors, unless we obtain your permission to do so. If you visit our website to read or download content, much of the information we do collect via cookies is statistical only (for example the domain from which you access the internet, the date and time you access our site, and the internet address of the website from which you linked directly to our site) and is not personally identifiable. We use this information about the number of visitors and their use of the sites in aggregate form to make our site more useful and attractive to users.

#### **6. OVERSEAS TRANSFER**

- 6.1 We use internet service providers that have servers located in Queensland and Australia. We may also use, or use in the future, internet service providers that may have servers located overseas, including cloud service providers. This means that your personal information supplied to us online, for example through our website or our social media sites, may sometimes be transferred overseas. If you elect to provide personal information to us through any of our online services you are deemed to consent to the possible overseas transfer of such information.
- 6.2 Apart from the above we will only transfer your personal information overseas if:
  - (a) we are required to do so by law;
  - (b) we reasonably believe that the recipient will be required to uphold privacy principles which are similar to the Australian Privacy Principles;
  - (c) you have consented to the transfer;
  - (d) it is not practical to obtain your consent or the transfer is for your benefit and your consent is likely to be given;
  - (e) the transfer of the information is necessary for the performance of a contract between you and us;  
or
  - (f) we have taken reasonable steps to ensure that your personal information will not be held, used or disclosed by the overseas recipient in a way which does not comply with the Privacy Act and/or the APPs.



## **7. PERSONAL INFORMATION FOR EU BASED INDIVIDUALS**

- 7.1 This clause 7 is applicable when the *General Data Protection Regulations 2016/679* applies.
- 7.2 You consent under the *General Data Protection Regulations 2016/679* to us using your personal information for the purposes in clause 3 in accordance with this clause.
- 7.3 We will:
- (a) only process your personal information to the minimal extent needed to satisfy our purpose;
  - (b) implement technical and organisational measures that enable clause 7(c)(i) to be satisfied;
  - (c) implement additional safeguards to protect special categories of personal information (e.g. health information, race, sexual orientation, religion and political beliefs); and
  - (d) ensure that any employees, officers, agents, contractors or subcontractors who we engage are substantially bound by the same terms.
- 7.4 We will implement a code of conduct that includes a requirement for us to comply with the *General Data Protection Regulations 2016/679*.
- 7.5 We will:
- (a) give you access to your personal information should you request it;
  - (b) provide your personal information to a third-party subject to you consenting to the disclosure; and
  - (c) erase your personal information if you ask for us to do so (subject to this not compromising our ability to carry out any research that is authorised by law or to exercise freedom of expression).
- 7.6 Subject to us receiving a request from you to, we will:
- (a) remove you from any direct marketing that uses your personal information;
  - (b) not use or process your personal information in a way so that is used for data profiling.
  - (c) If you are under the age of 16, we will use our best endeavours to obtain consent from your parent or guardian.
- 7.7 We will implement legal arrangements that are substantially consistent with clause 7.9 when your personal information is transferred to a country that has not been approved by the European Union.
- 7.8 We will take steps to actively notify you within 72 hours of us discovering that your personal information has been used or disclosed in a way that is inconsistent with this Policy.
- 7.9 Through our contact person under clause 9.1, we will respond to any queries or requests you might have about the use, disclosure, protection or removal of your personal information.

## **8. DATA SECURITY**

- 8.1 We are committed to protecting your personal information from misuse and loss, and from unauthorised access, modification and disclosure, and will take reasonable steps to do so.



- 8.2 Our personnel who have access to personal information have been trained to maintain the confidentiality of such information.
- 8.3 Unfortunately, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, You acknowledge that:
- (a) there are security and privacy limitations of the Internet which are beyond our control;
  - (b) the security, integrity and privacy of any and all information and data exchanged between you and us through our website cannot be guaranteed; and
  - (c) such information and data may be viewed or tampered with in transit by a third party.
- 8.4 Except to the extent liability cannot be excluded due to the operation of statute, we exclude all liability (including in negligence) for the consequences of any unauthorised access to your personal information. Please notify us immediately if you become aware of any breach of security.

## **9. FURTHER INFORMATION**

- 9.1 We recognise our responsibility for protecting the privacy of your personal information. If you have questions or comments about our administration of your personal information, please contact us at [atmanager@safetcompanion.com.au](mailto:atmanager@safetcompanion.com.au). You may also use this address to communicate any concerns you may have regarding compliance with our Privacy Policy.
- 9.2 If you are not satisfied with how we handled your complaint, you can lodge a complaint with us or with the Office of the Australian Information Commissioner at:

Telephone	1300 363 992
Post	GPO Box 5218 Sydney NSW 2001
Facsimile	+61 2 9284 9666
Email	<a href="mailto:enquiries@oaic.gov.au">enquiries@oaic.gov.au</a>
Website	<a href="http://www.oaic.gov.au">www.oaic.gov.au</a>