

# SureComm Privacy Policy

Sure Communications Australia – Version 210915



## Privacy Policy

This is the Sure Communications Australia Pty Ltd Privacy Policy which explains how Sure Communications Australia and its related group companies (SureComm, we, our or us) manages your personal information. This policy only applies to personal information that identifies or could reasonably identify you.

The entity responsible for your personal information (and the controller for the purpose of, and to the extent that, the Data Protection Laws apply) will be the SureComm entity that collects personal information from you. Depending on the nature of your dealings with us, you may also receive a collection notice and privacy policy from a related group company where, for example, you engage them to provide a service to you.

## Collecting Personal Information

The types of personal information we may collect depends on the nature of your dealings with us. We only collect information that is reasonably necessary for SureComm functions and activities or for matters directly related to them. Related purposes (or secondary purposes) include matters such as marketing and statistical analysis associated with the use of websites our products and services or recruitment, for product, process and system improvement and development, to obtain your feedback and to comply with our legal obligations. We may also collect personal information for any other reason that we disclose to you, and which you consent to, at time of the collection.

Typically, the information we collect includes details your name, date of birth, address, contact details and financial information such as bank account details. We may collect other information from you with your consent. Depending on the nature of your dealings with us, we may collect sensitive information. For example, where you are applying for employment with SureComm we may collect information regarding your citizenship and health related information. If you provide us with sensitive information you understand and give your explicit consent that we may collect, use and disclose this information to appropriate third parties for the purposes described in this policy.

Usually we collect information directly from you or your authorised representative. We may collect information about you from our related companies, channel partners or affiliates, where you register, visit or use the SureComm website, or the website of a related company, where you obtain products or services from us or where you otherwise engage with us or a related company. We may also collect information about you via third parties with your consent. For example, where you apply for employment with us we may use a third party provider to collect and process your personal information via an online portal, careers site or correspondence with you. To the extent the Data Protection Laws apply, we will only collect and use personal information on a lawful basis.

In some instances, we automatically collect certain types of information when you visit our websites and through e-mails that we may exchange. Automated technologies may include the use of web server logs to collect IP addresses, "cookies" and web beacons. Further information about our use of cookies can be found in our website Terms of Use.

Where you engage with us on or through third party social media sites or applications, you may allow us to have ongoing access to certain information from your social media account (e.g. your name, e-mail address, photo, gender, birthday, the posts or the 'likes' you make). If you post information when you interact with our websites through social media sites or other applications, depending on your privacy settings, this information may become public on the internet. You can control what information you share through privacy settings available on some social media sites.

If you access our websites on your mobile telephone or mobile device, we may also collect your unique device identifier and mobile device IP address, as well as information about your device's operating system, mobile carrier and your location information. 2 Sure Communications Australia Pty Ltd ABN 97 121 995 159

If we ask you for personal information and you do choose not to provide that information to us we might not be able provide you with services, information regarding our businesses, answer your queries, assist you or proceed with an employment application.

## Using your personal information

The following is a summary of the purposes for which we may use your personal information. More information about the personal information collected for each of our services will be provided to you in separate privacy notices which are relevant to the services which affect you. We may use your personal information for the following:

- Supplying products and services to you;
- Administering our relationship with you including as a shareholder of SureComm, a customer of SureComm and any of its related businesses;
- Processing applications of employment;
- Analysing data about how you use or interact with the services offered or our website;
- Sending you email notifications that you have specifically requested;
- Sending you marketing communications relating to our businesses where you have specifically agreed to this, by email or similar technology;
- Providing third parties with deidentified and anonymous statistical information about our users;
- Dealing with inquiries and complaints made by you;
- Keeping our websites secure and preventing fraud; and
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or other governmental authority including the ASX stock exchange.

To the extent the Data Protection Laws apply, we will only use your personal information if we are satisfied there is an appropriate legal basis to do so. We will only use your personal information for the purposes set out in this Privacy Policy or as notified to you, with your consent.

## How long do we retain your personal information?

How long we retain your personal information depends on the purpose for which it was obtained and its nature. We will keep your personal information for the period necessary to fulfil the purposes described in this Privacy Policy, or as specified in a related group company privacy policy issued to you, unless a longer retention period is permitted by law. In specific circumstances we may store your personal information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

## Disclosing personal information

We may disclose your personal information to our employees or as reasonably necessary for the purposes set out in this Privacy Policy. We typically share personal information with any member of our group of companies, brands or divisions for the activities listed in this Privacy Policy.

Except as provided in this Privacy Policy, we will not provide your personal information to third parties.

We may disclose your personal information:

- to the extent that we are required to do so by law, to respond to a subpoena, search warrant, or other legal request or to comply with any legal rule or regulation (such as the rules of the ASX stock exchange);
- in order to establish, exercise or defend our legal rights (including provided information to others for the purposes of fraud prevention);
- to business partners or consultants that provides specialised services to us including banking and finance consultants, lawyers, insurers, credit reporting agencies, fraud detection agencies, recruitment agencies and law enforcement agencies or other agencies for the purposes of performing background checks;
- to service providers we have retained as processors of your information to perform services on our behalf (either in relation to services performed for you, or information which we use for its own purposes) and includes third party employment service providers. These service Telcoinabox Operations Pty Ltd ACN 162 159 935 providers are contractually restricted from using or disclosing the information except as necessary to perform services on our behalf or to comply with legal requirements; or
- in the event that SureComm or its related group companies are subject to a merger or acquisition, to the new owner.

## International data transfers

Information that we collect may be stored, processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this policy. Examples of countries we transfer personal information to include, but are not limited to, the United States of America, the United Kingdom, New Zealand, Singapore, and the Philippines.

To the extent the Data Protection Laws apply, to ensure your right and protections we ensure any transfer are covered by agreements that contain commitments to protect your personal information based on the EU Commission standard contractual clauses.

## Data Security

The security of your personal information is important to us and SureComm has implemented reasonable physical, technical and administrative security standards to protect personal information from loss, misuse, alteration or destruction. We protect your personal information against unauthorised access, use or disclosure, using security technologies and process as encryption and limited access. Only authorised individuals access your personal information, and they receive training about the importance of protecting personal information.

Our service providers and agents are contractually bound to maintain the confidentiality of personal information and may not use the information for any unauthorised purpose. We take reasonable steps to destroy or de-identify personal information if we no longer need the information for any permitted purpose or if we are not required by law to retain the information.

## Your rights

You may instruct us to provide you with any personal information that we hold about you.

We may withhold personal information that you request to the extent permitted by law.

You may instruct us at any time not to process your personal information for marketing purposes.

In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

## Updating information

Please let us know if the personal information that we hold about you needs to be corrected or updated.

## Other rights regarding your data -Data Protection Laws

You have additional rights regarding your personal information where the Data Protection Laws apply. You can exercise your rights by contacting us. Subject to legal and other permissible considerations, we will make every reasonable effort to address your request promptly or inform you if we require further information in order to fulfil your request.

### Right to Access

You have right to access personal information which SureComm holds about you, request a copy of that information and details of what we have done with that information (ie how long we kept it for and who we disclosed it to).

### Right to Rectification

You have a right to request us to correct your personal information where it is inaccurate or out of date.  
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Right to be Forgotten (Right to Erasure)

You have the right under certain circumstances to have your personal information erased. Your information can only be erased if your data is no longer necessary for the purpose for which it was collected, we have no other legal ground for processing the data or if the processing of your data was based on consent, the withdrawal of that consent.

### Right to Restrict Processing

You have the right to restrict the processing of your personal information, but only where:

- its accuracy is contested, to allow us to verify its accuracy; or
- the processing is unlawful, but you do not want it erased; or
- it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
- you have exercised the right to object, and verification of overriding grounds is pending.

## **Right to Data Portability**

You have the right to data portability, which requires us to provide personal information to you or another controller in a commonly used, machine readable format, but only where the processing of that information is based on (i) consent; or (ii) the performance of a contract to which you are a party.

## **Right to Object to Processing**

You have the right to object the processing of your personal information at any time, but only where that processing is has our legitimate interests as its legal basis. If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

## **Right to Decline Automated Decision Making**

You have the right to not be subject to decisions based solely on automated decision making, which produce legal or significant effects for you, except where these are (i) necessary for a contract to which you are a party; (ii) authorised by law; (iii) based on your explicit consent.

Even where such decisions are permitted, you can contest the decision and require Comms Code to exercise human intervention.

We currently do not use automated decision making (including automated decision making using profiling) when processing your personal information. If we ever use an automated decision making solution, you have a right to request that a decision based off your personal information cannot be solely decided via an automated process.

## **Changes to this Privacy Policy**

We may update Privacy Policy from time to time. When we do, we will post the current version on this site.

We encourage you to periodically review this Privacy Policy so that you will be aware of our privacy practices.

## **Definitions**

In this Privacy Policy the following terms have the meanings as set out below:

Controller or Controlling has the meaning given to it in the Data Protection Laws.

Data Protection Laws means (i) the General Data Protection Regulation 2016/679; or (ii) the Data Protection Act 1988 as amended from time to time.

Processor or Processing has the meaning given to it in the Data Protection Laws.