

Privacy Policy

M2 Technology Group Pty Ltd (ABN 24 061 357 373)

Effective: 2 December 2020

M2 Technology Group Pty Ltd (“M2 Technology”, “we”, “us”, “our”) is committed to protecting your privacy and safeguarding the information we have collected. This policy outlines our ongoing obligations in respect to how we manage Personal Information.

We have adopted and are bound by the Commonwealth Privacy Act 1988 (Cth) (“Privacy Act”), including the Australian Privacy Principles (“APPs”) contained therein. As such, this policy has been drafted in accordance with the principles concerning the protection of your personal information. The APPs govern the way in which we collect, use, disclose, store, secure and dispose personal information.

A copy of the Australian Privacy Principles can be obtained from the Office of the Australian Information Commissioner (www.oaic.gov.au).

By providing your personal information to us, either through our website, our staff or otherwise, you agree to the collection, use and disclosure of that information in accordance with this Privacy Policy. If you do not consent to certain uses of your personal information, we may not be able to provide you with a particular product or service.

This policy is a public document and has been prepared considering APP 1: Open and transparent management of personal information.

1.0 Definitions

“Collect” means gather, acquire or obtain by any means, information in circumstances where the individual is identifiable or identified.

“Collection Information” means the information outlined in Clause 2.3 notified to individuals prior to, or as soon as practicable after, the collection of their Personal Information.

“Direct Marketing” means the marketing of goods or services through means of communication including written, verbal or electronic means.

“Disclose”, “Disclosure” and “Disclosed” generally means the release of information outside M2 Technology.

“Individuals” includes any natural persons and legal entity as defined by the Corporations Act.

“Opt Out” means an individual's expressed request not to receive further Direct Marketing.

“Personal Information” means information or an opinion (including information or an opinion forming part of a database), whether true or not and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained from the information or opinion.

“Primary Purpose” is the dominant or fundamental reason for information being collected in a particular transaction.

“Privacy Act” means the Commonwealth Privacy Act 1988 (including the Australian Privacy Principles).

“Privacy Policy” is taken to mean this privacy policy document.

“Reasonable Expectation” means a reasonable individual's expectation that their Personal Information might be Used or Disclosed for the particular purpose.

“Use” and “Used” means the handling of Personal Information within M2 Technology.

2.0 Collection

- 2.1 We will only collect Personal Information where the information is necessary for us to perform one or more of our functions or activities. In this context, "collect" is as defined in Clause 1: Definitions of this Privacy Policy. Examples include, but not limited to, names, addresses, email addresses and phone numbers.
- 2.2 We Collect Personal Information primarily to supply products and services to you. We also Collect and Use Personal Information for secondary purposes including (but not limited to):
- billing and account management;
 - business planning and product development;
 - marketing; and
 - to provide information about promotions, as well as the products and services of other M2 Technology businesses and other organisations.

You may unsubscribe from our marketing/promotions lists at any time by contacting us in writing.

- 2.3 When we Collect Personal Information we will, where appropriate and where possible, take reasonable steps to explain the matters listed below. This includes if the information is collected from someone else.
- The purpose for which we are collecting the information;
 - Our identity and how you can contact us, if this is not obvious;
 - That you can access the Personal Information that we hold about you;
 - That you should contact us if wish to access or correct Personal Information collected by us or have any concerns in relation to your Personal Information;
 - The organisations or types of organisations to whom we usually disclose the Personal Information including related bodies corporates and contractors;
 - Where applicable, any law that requires the Personal Information to be collected;
 - The consequences (if any) for you if all or part of the Personal Information is not provided to us.
- 2.4 Where it is not practicable for us to notify you of all of the Collection Information before the collection of Personal Information, we will ensure that you are notified of the Collection Information as soon as possible after the collection.
- 2.5 We Collect Personal Information only by lawful and fair means and not in an unreasonably intrusive way. Where possible, we will Collect Personal Information about you from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

3.0 Use and Disclosure

- 3.1 We Use Personal Information primarily for the purposes listed in Clause 2.2 above.
- 3.2 We may disclose your personal information in several circumstances including the following:
- to third parties where you have consented to the Use or Disclosure including disclosures made under the credit reporting requirements of the Privacy Act; or
 - where required or permitted by law.
- 3.3 If we conduct any Direct Marketing, we will ensure that:
- you have not made a request to us not to receive Direct Marketing communications;
 - you are clearly notified of your right to Opt Out from further Direct Marketing;
 - there is only one Use of the information before the Opt Out right is given;
 - you are given an Opt Out in all further instances of Direct Marketing if you have not previously chosen to Opt Out; and
 - if you Opt Out of all Direct Marketing, the Opt Out will be respected by us.

- 3.4 Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will only be used by us:

- for the Primary Purpose for which it was obtained;
- for a secondary purpose that is directly related to the Primary Purpose;
- with your consent; or
- where required or authorised by law.

- 3.5 If a Disclosure is not for a Primary Purpose, is not for a related secondary purpose, or upfront consent has not been obtained, we will not disclose Personal Information otherwise than in accordance with the exceptions set out in this Privacy Policy.

- 3.6 We may Use Personal Information to avoid an imminent threat to a person's life or to public safety. We may also Use Personal Information for reasons related to law enforcement or internal investigations into unlawful activities.

- 3.7 We do not generally sell or share our customer lists on a commercial basis with third parties but if we did, we would only do so if we had the appropriate consent of the individual involved.

4.0 Information quality

- 4.1 We will take reasonable steps to ensure that the information we Collect, Use and Disclose is accurate, complete and up-to-date.

5.0 Information security

- 5.1 Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or Disclosure.
- 5.2 We require employees and contractors to perform their duties in a manner that is consistent with our legal responsibilities in relation to privacy.
- 5.3 We will take all reasonable steps to ensure that paper and electronic records containing Personal Information are stored in facilities that are only accessible by our employees for the sole purpose of performing their job.
- 5.4 We will review, on a regular and ongoing basis, our information security practices to ascertain how ongoing responsibilities can be achieved and maintained.
- 5.5 We will take reasonable steps to destroy or permanently de-identify Personal Information if it is no longer needed for any purpose.

6.0 Openness

- 6.1 Our Privacy Officer will be the first point of contact for enquiries about privacy issues. Individuals wishing to make an enquiry or complaint regarding privacy should do so by contacting M2 Technology's Privacy Officer.
- 6.2 M2 Technology's website (www.m2technology.com.au) contains a copy of this Privacy Policy.
- 6.3 This Privacy Policy is a publicly available document and is accessible by the general public.
- 6.4 On request by an individual, we will take reasonable steps to let the individual know, generally, the sort of Personal Information we hold, for what purpose, and how we Collect, hold, Use and Discloses that information.

7.0 Access and correction

- 7.1 We will allow our records containing Personal Information to be accessed by the individual concerned in accordance with the Privacy Act.
- 7.2 We will correct our records containing Personal Information as soon as practically possible, at the request of the individual concerned in accordance with the Privacy Act.
- 7.3 Individuals wishing to lodge a request to access and/or correct their Personal Information should do so by contacting M2 Technology's Privacy Officer in writing.
- 7.4 We may charge an administrative fee for providing you a copy of your Personal Information.

8.0 Anonymous transactions

- 8.1 We will not make it mandatory for visitors to our websites to provide Personal Information.

9.0 Transferring Personal Information overseas

- 9.1 We will only send Personal Information to an unrelated organisation overseas where:
- you have provided consent to the transfer; or
 - the transfer is necessary for the performance of a contract between you and the organisation; or
 - the transfer is necessary for the conclusion or performance of a contract concluded in your interest between the organisation and a third party; or
 - the transfer is for your benefit but it was impracticable to obtain your consent prior to that transfer and if it were practicable to obtain such consent, you would be likely to give the consent.

Contacting Us

If you require further information regarding M2 Technology's Privacy Policy, you can contact our Privacy Officer on:

Telephone: **+61 8 9315 0000**
Online: www.m2technology.com.au

PO Box 588
Applecross WA 6953