

Privacy Policy - Adept Risk Solutions PTY LTD (ACN 618 100 440)

We recognise the trust you are placing in us by providing your personal details and we are committed to the protection of your personal information. This policy applies to and is adopted by our employees, related entities and associated companies and contractors which are subject to the Privacy Act 1988.

What personal information we generally collect and why:

We collect information in a number of different ways including directly, indirectly and through third parties including:

- Via our website (please refer to our website terms of use);
- Via email;
- Via social media;
- Over the phone;
- In person;
- In connection with competitions.

When collecting your personal information, we may ask you to provide the following information:

- Your name, address, telephone number and email address;
- Credit card or banking details (if applicable);
- Details of interaction between you and our staff;
- Feedback in relation to your experience with us.

If you provide us with direct debit or direct credit details, we will only disclose those details to our bank to facilitate the provision of that service.

We collect your personal information so we can provide our services and goods to you. In addition, we may utilise this information to communicate news, promotional offers or special events to you or for marketing, research, planning and product development purposes.

This information is used to assist the conduct of our business, to provide and market our services, to communicate with you and, most importantly, to help us manage and enhance our services for you. By providing consent to receive these communications from us you are acknowledging that the consent will remain current until you advise us otherwise in writing.

You can opt out at any time by contacting our Privacy Officer or by unsubscribing to our commercial electronic messages as set out below.

Junk mail or unsolicited email

You will only receive emails from us if:

- You subscribe to our Email Newsletters service. Our Email Newsletters will keep you informed of the latest offers, current promotions, news and events. If you no longer wish to receive Email Newsletters, you may unsubscribe by clicking the 'unsubscribe' option at the bottom of our newsletter emails;

- You request information about our services when you choose to contact us. You will not be added to a mailing list of any kind and will only receive e-mails related to the matter that you have contacted us about;
- You provide your details and request that we contact you when you send us your Résumé; or
- They are otherwise relevant to the reasons for which we hold your email address, where we are permitted to do so by law.

The Company will destroy information if the information was not lawfully collected by us, and/or by written request by you

Suppliers

If you, or a company you work for, supplies goods or services to us, we may collect personal information about you in connection with the provision of those goods or services, either directly from you or from that company. This information may include your name, date of birth, contact information, and any other information you provide. This information will be used for the purposes of managing the provision of those good or services only.

Other information we collect

We may also collect the following information from you:

- The fully qualified domain name from which you accessed our websites, or your IP address;
- The date and time you accessed each page on our websites;
- The URL of any webpage from which you accessed our websites (the referrer);
- Cookies which track your visits to the our web sites; and
- The web browser that you are using and the pages you accessed.

We use this information so that we can tell which pages are the most popular and where people spend most of their time on our website. We use this information to improve our website and our services delivered to you. In some circumstances we may collect personal information about an individual from a third party, for example, to analyse traffic at our website. If this information is linked with personal information we already hold about you (as set out above), this new information will be treated as personal information and will be handled in the same manner as the personal information to which it has been linked.

Are we likely to disclose your personal information overseas?

We may disclose your personal information to the following overseas recipients:

- Other trusted companies or individuals who assist us in providing services or who perform functions on their behalf (such as third party service providers and specialist consultants);
- Anyone else to whom you authorise us to disclose it; and
- Anyone authorised by law.

How your personal information is stored and kept secure

All personal information collected by us is held securely on a secure computer storage facility or in printed form. This information is only made available to our staff, contractors and third parties to a level that is necessary for them to perform their duties, and in accordance with the terms as set out in this Privacy Policy.

We establish and maintain safeguards against the destruction, loss or alteration of all personal information that:

- (i) are consistent with and no less rigorous than those maintained by you to secure that data; and
- (ii) comply with all applicable laws and procedures specified by you concerning your data security.

We will:

- (i) comply with all of your data security requirements in respect of access to your data as notified to us in writing from time to time, including requirements regarding the dedicated or direct interconnection with any of our systems, platforms or devices and your operating environment and any amendments to such requirements agreed between us (acting reasonably) from time to time;
- (ii) prohibit and prevent any person who does not have the appropriate level of security clearance from gaining access to your data;
- (iii) notify you immediately and comply with all your directions if we become aware of the contravention of any of your data security requirement;
- (iv) keep your data physically and logically separate from the data of our other customers and identify it as your data;
- (v) apply appropriate security procedures within our premises and take precautions necessary to preserve the integrity of the your data;
- (vi) apply appropriate procedures designed to prevent any unauthorised third party from gaining access to any of your data or any information forming part of or being used in connection with the performance of any goods or services provided to you as a result of any act or omission of us or our personnel;
- (vii) ensure that we and our personnel do not deliberately or negligently corrupt, erase or otherwise alter your data; and
- (viii) immediately notify you of any actual or potential breach of this Privacy Policy and take all steps to mitigate or avoid such breach (and prevent it from reoccurring).

When your personal information is no longer required we will take reasonable steps to destroy it. These measures are designed to assist in your personal information not being accessed by unauthorised personnel, lost or misused. If you reasonably believe that there has been unauthorised use or disclosure of your personal information, please contact us immediately (contact details below).

If we believe there has been a breach of our privacy obligations (such as unauthorised access or disclosure) which is likely to result in serious harm to you, we will notify you and the Office of the Australian Information Commissioner as soon as practicable.

Accessing your information

In order to maintain the security of your personal information we may require you to provide proof of your identity before discussing any personal information and we may ask you to specify what information you require. Ways in which we may ask you to provide proof of identity may include the following:

- Certified Photo Identification (for example, passport, drivers licence etc.)
- Providing date of birth, address, telephone number or other particulars pertaining to your identity
- Providing passwords or codes

All reasonable steps are taken by us to ensure that your personal information held by us is accurate, complete and up to date. If you believe that any of your personal information is inaccurate, please contact us and subject to the exceptions set out in the Privacy Act 1988, you may seek access to and correction of the personal information which we hold about you and we will take all reasonable steps to correct it within a reasonable timeframe.

How you can make a privacy related complaint?

To the extent that any breach amounts to an 'eligible data breach' (such that term is defined in the Privacy Act 1988 (Cth)), we will work with you in good faith to ensure any notification obligations under the Privacy Act 1988 (Cth) are met.

If you have any questions about privacy-related issues or wish to complain about a breach of the Australian Privacy Principles or the handling of your personal information by us, please contact us. We may ask you to lodge your complaint in writing. Any complaint will be investigated by our Privacy Officer and you will be notified of the making of a decision in relation to your complaint as soon as is practicable after it has been made (usually within 30 days). If you are not satisfied with our response, you can refer your complaint to the Office of the Australian Information Commissioner (details below).

Changes to our privacy policy

This privacy policy relates to our current privacy standards. We may periodically amend our Privacy Policy in accordance with the Privacy Act 1988 and other relevant laws. It is your responsibility to ensure you understand our current Privacy Policy. The most current version of our Privacy Policy is located on our website and can be obtained by contacting our Privacy Officer.

By using or subscribing to our services or by purchasing our products without written objection, you agree to us using your personal information in accordance with the terms of our Privacy Policy.

Questions or Complaints

Should you have any questions or complaints about our Privacy Policy, please contact us:

Privacy Officer: **Tania Tolliday**
Email: **tanial@adeptsolutions.com.au**
Phone: **0448 641 277**

For more information on privacy in Australia, please visit the Australian Commonwealth Government's Office of the Australian Information Commissioner's website at www.oaic.gov.au.