

Privacy Policy

1. PRIVACY POLICY

1.1 **Alliance Business Technologies** (ABTechnologies)(trading under Computer Alliance Pty Ltd ACN 092 544 253) recognise the importance of protecting the privacy and the rights of individuals in relation to their personal information. This Privacy Policy will explain the key processes and systems that we have set in place in order to:

- (a) comply with the Privacy Act 1988 ('the Privacy Act'), the Privacy Amendment (Enhancing Privacy Protection) Act 2012 and the Australian Privacy Principles ('APPs');
- (b) ensure that we manage your personal information in an open and transparent way;
- (c) explain the type of information we hold, for what purposes and how we collect, hold, use and disclose that information;
- (d) explain how you can obtain details of the information we collect from you;
- (e) make sure your personal information is kept accurate and up to date and to properly dispose of any personal information which is no longer required by us; and
- (f) keep your personal information secure.

1.2 This privacy policy also incorporates our policy on managing credit information (see particularly section 1 onwards).

Who does the privacy policy apply to?

1.3 This policy applies to any person in relation to whom we currently hold, or may in the future collect, personal information.

What information does the privacy policy apply to?

This policy applies to personal information.

2. WHAT IS YOUR PERSONAL INFORMATION?

2.1 When used in this privacy policy, the term 'personal information' has the meaning given to it in the Privacy Act. In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number, email address and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

2.2 Information is not personal information where the information cannot be linked to an identifiable individual.

3. WHAT KINDS OF PERSONAL INFORMATION DO WE COLLECT AND HOLD?

3.1 We will only collect from you information that is necessary and relevant to the specific service or services that we are providing to you. This means that the personal information we may collect differs depending on whether you are a customer, subcontractor, prospective employee or agent. In general, we may request that you provide that customers provide some or all of the following information:

- (a) Information that we may require to identify and contact you, including your name, address, telephone number and/or e-mail address;
- (b) Information we may require to confirm your identify, including your date of birth, driver's licence, business name and/or bank card;
- (c) Information that may assist us to confirm your financial position when you are considering a credit arrangement, including your credit card details, bank details and purchase history;
- (d) Details of the products and services you have purchased from us or which you have enquired about, together with any additional information necessary to delivery those products and services and to respond to your enquiries; and
- (e) Any additional information relating to you that you provide to us directly through our website or indirectly through use of our websites or online presence, through our representatives or otherwise.

3.2 If you are a subcontractor, agent or a prospective employee, we may also collect and hold the above personal information about you in addition to:

- (a) sensitive information (see below);
- (b) employment arrangements and history;
- (c) insurance information and claims history;
- (d) education details;
- (e) banking details and credit information;
- (f) driving history; and
- (g) any other personal information required to engage you as our subcontractor or agent, or to consider offering you employment.

Sensitive information

3.3 'Sensitive information' is a subset of personal information and includes personal information that may have serious ramifications for the individual concerned if used inappropriately.

3.4 Generally, we do not collect sensitive information about customers.

3.5 However, we may collect sensitive information from and about subcontractors and agents, and prospective employees and subcontractors, such as:

- (a) health information; or
- (b) criminal history;

3.6 We will not collect sensitive information without the individual's consent to which the information relates unless permitted under the Privacy Act.

Generally, you have no obligation to provide any information requested by us. If you choose to withhold requested information however, we may not be able to provide you with the goods and services that depend on the collection of that information or we may not be able to engage or employ you, particularly if the collection of that information is required by law.

4. WHY DO WE COLLECT, HOLD AND USE YOUR PERSONAL INFORMATION?

4.1 We take reasonable steps to use and disclose personal information for the primary purpose for which we collect it. The primary purpose for which information is collected varies, depending on the particular service being provided or the individual from whom we are collecting the information but is generally as follows:

- (a) in the case of customers – we might need to collect, hold, use or disclose your personal information in order to provide goods and services to you;
- (b) In the case of in the case of subcontractors and agents - to assist us in providing our customers with our goods and services; and
- (c) in the case of potential employees and subcontractors – to assess your suitability for employment or engagement.

4.2 Personal information may also be used or disclosed by us for secondary purposes that are within an individual's reasonable expectations and that are related to the primary purpose of collection.

4.3 For example:

- (a) in the case of customers, we may also use personal information to:
 - (i) provide information and respond to queries in relation to our goods and services;
 - (ii) process warranties and coordinate the installation of goods;
 - (iii) set up and activate your account with Alliance Business Technologies online;
 - (iv) facilitate and process your orders and payments;
 - (v) to facilitate your entry into competitions;
 - (vi) assist us in providing and improving our services to you, and to analyse trends in sales and better understand your needs or to develop, improve and market our products and services to you;
 - (vii) update our records and keep your contact details up to date;
 - (viii) process and respond to any complaint made by you;
 - (ix) advise you of new products and services, including for marketing and re-marketing purposes; and
 - (x) for use in direct marketing of promotions, products and services;
 - (xi) assess eligibility for credit; and
- (b) in the case of in the case of subcontractors and agents:
 - (i) to conduct checks to ensure that the subcontractor or agent can perform and is performing the services to our standards; and
 - (ii) for payment purposes.

4.4 You have the right to tell us that you do not want us to send information to you other than for the main purpose for which we have collected your personal details. Other than as outlined in this Privacy Policy or in any notice provided to you at the time of collecting your personal

information, we will not disclose your personal information without your consent unless disclosure is either necessary to prevent a threat to life or health, authorized or required by law, reasonable necessary to enforce the law or necessary to investigate a suspected unlawful activity.

5. HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

5.1 The means by which we collect your personal information will depend on the nature of the service that we are providing to you. We may collect your personal information:

- (a) directly from you, either in person or over the phone;
- (b) when you place an order via the Website;
- (c) when you interact with the Website;
- (d) from our affiliated companies, vendors, or partners;
- (e) from your representatives;
- (f) from publicly available sources of information;
- (g) from our own records of your dealings with us; or
- (h) from other sources.

6. COOKIES

6.1 A cookie is a small data file that websites may write to your local computer storage when you visit them. The only personal information a cookie can obtain is information supplied by the user. A cookie cannot read data from your hard disk or read cookie files created by other sites.

6.2 You can refuse cookies by turning them off in your web browser and you do not need to have cookies turned on to browse our website. However, cookies are required for some features of our website, such as the shopping cart and checkout facility. Most browsers are defaulted to accept and maintain cookies and you can set your browser to notify you when you receive a cookie, giving you the chance to decide whether to accept it or not. Computer Alliance uses third party cookies to track users' habits so that we can improve our online products and services. These third party cookies can be disabled by the user.

7. WHAT HAPPENS IF WE CAN'T COLLECT YOUR PERSONAL INFORMATION?

7.1 If you do not provide us with the personal information described above, some or all of the following may happen:

- (a) we may not be able to provide the requested products or services to you, either to the same standard or at all;
- (b) we may not be able to provide you with information about products and services that you may want, including information about discounts, sales or specials promotions;
- (c) we may be unable to tailor the content of our website to your preferences and your experience of our website may not be enjoyable or useful; or
- (d) we may not be able to engage or employ you.

8. HOW DO WE HOLD PERSONAL INFORMATION?

8.1 Our usual approach to holding personal information includes holding that personal information:

- (a) physically, at our premises; and
- (b) electronically:
 - (i) on secure online servers;
 - (ii) by a third party data storage provider; and
 - (iii) on our website.

8.2 We secure the personal information we hold in numerous ways, including:

- (a) using security cards/systems to limit access;
- (b) using security cards to access premises outside of business hours;
- (c) using secure servers to store personal information;
- (d) using unique usernames, passwords and other protections on systems that can access personal information; and
- (e) holding certain sensitive documents securely.

9. HOW DO WE MANAGE THE PERSONAL INFORMATION WE COLLECT?

9.1 We manage the personal information we collect in numerous ways, such as by:

- (a) implementing procedures for identifying and managing privacy risks;
- (b) implementing security systems for protecting personal information from misuse, interference and loss from unauthorised access, modification or disclosure;
- (c) providing staff with training on privacy issues;
- (d) implementing mechanisms to ensure any agents, contractors or service providers who deal with us comply with the APPs;
- (e) implementing procedures for identifying and reporting privacy breaches and for receiving and responding to complaints; and
- (f) appointing a privacy officer within the business to monitor privacy compliance.

9.2 We will take reasonable steps to destroy or de-identify personal information if that information is no longer needed for the purposes for which we are authorised to use it.

10. TO WHOM MAY WE DISCLOSE YOUR INFORMATION?

10.1 We may disclose your personal information to:

- (a) our employees, related body corporates or service providers including third party technology providers we engage from time to time, such as our data storage providers and email filter providers for the purposes of operation of our website or our business, fulfilling requests by you, and to otherwise provide products and services to you

including, without limitation web hosting providers, IT systems administrators, mailing houses, payment processors, and couriers;

- (b) financial institutions, suppliers, insurance brokers and insurers and other third parties with whom we have commercial relationships, for business, marketing and related purposes; and
- (c) any organisation for any authorised purpose with your express consent.

10.2 Otherwise, we will only disclose personal information to third parties if permitted by the Privacy Act.

11. DIRECT MARKETING MATERIALS

11.1 We may send you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail and email, in accordance with applicable marketing laws, such as the Spam Act 2003 (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.

11.2 In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see details below), or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list.

12. DO WE DISCLOSE YOUR PERSONAL INFORMATION TO ANYONE OUTSIDE AUSTRALIA?

12.1 We may disclose your personal information to our third party suppliers and service providers with data centres located overseas for some of the purposes listed above. For example, we use software providers such as:

- (a) Microsoft, which we understand stores information typically in the region of the customer but may transfer information overseas; and
- (b) Barracuda Email Security Gateway, which we understand predominantly stores data on servers in the United States of America.

12.2 Your personal information will not be disclosed to overseas recipients unless we are satisfied that the recipient is subject to privacy protection laws that offer substantially similar levels of protection as those required under the Australian Privacy Principles or if we have taken reasonable steps to ensure this personal information is handled in a safe and secure manner and that overseas entity is aware of the obligations relating to the information under the APPs.

13. HOW DO WE MANAGE YOUR CREDIT INFORMATION?

What kinds of credit information may we collect?

13.1 In the course of providing our services to you, we may collect and hold the following kinds of credit information:

- (a) your identification information;
- (b) information about any credit that has been provided to you;
- (c) your repayment history;
- (d) information about your overdue payments;

- (e) if terms and conditions of your credit arrangements are varied;
- (f) if any court proceedings are initiated against you in relation to your credit activities;
- (g) information about any bankruptcy or debt agreements involving you;
- (h) any publicly available information about your credit worthiness; and
- (i) any information about you where you may have fraudulently or otherwise committed a serious credit infringement.

13.2 We generally do not collect credit information about contractors, service providers and prospective employees and contractors.

How and when do we collect credit information?

13.3 In most cases, we will only collect credit information about you if you disclose it to us and it is relevant in providing you with our products and services.

13.4 Other sources we may collect credit information from include:

- (a) government bodies (such as the Australian Taxation Office and the Australian Securities and Investment Commission);
- (b) our related entities;
- (c) banks and other credit providers;
- (d) other individuals and entities via referrals;
- (e) your suppliers and creditors; and
- (f) our subcontractors and agents.

13.5 We do not collect and hold credit information about you from credit reporting bodies.

How do we store and hold the credit information?

13.6 We store and hold credit information in the same manner as outlined in section 8 of this policy.

Why do we collect the credit information?

13.7 Our usual purpose for collecting, holding, using and disclosing credit information about you is to enable us to provide you with our goods and services.

13.8 We may also collect the credit information:

- (a) to process payments;
- (b) assess eligibility for credit; and
- (c) for other purposes incidental to our services.

Overseas disclosure of the credit information

13.9 We disclose limited information to service providers located outside of Australia, however, this is generally not credit information. In addition to this, some software providers we use may store information in public clouds with data centres located overseas. We have outlined this in detail in section 12 of this policy.

14. HOW YOU CAN ACCESS AND CORRECT YOUR PERSONAL INFORMATION AND CREDIT INFORMATION?

- 14.1 You may request access to any personal information we hold about you at any time by contacting us in writing with the details outlined in section 16 below.
- 14.2 Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example by mailing or emailing it to you). For most requests, your information will be provided free of charge, however we may charge a reasonable fee if your request requires a substantial effort on our part. We will not charge for simply making the request and will not charge for making any corrections to your personal information.
- 14.3 There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if:
- (a) granting access would interfere with the privacy of others; or
 - (b) it would result in a breach of confidentiality.
 - (c) the request is unreasonable;
 - (d) providing access would pose a serious and imminent threat to the life or health of any person; or
 - (e) there are other legal grounds to deny the request.
- 14.4 If that happens, we will give you written reasons for any refusal.
- 14.5 If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then we will also provide you with an opportunity to correct any of your personal information that we hold.
- 14.6 In keeping with our commitment to protect the privacy of personal information, we may not disclose personal information to you without proof of identity.
- 14.7 If the personal information we hold is not accurate, complete and up-to-date, we will take reasonable steps to correct it where it is appropriate to do so.

15. WHAT IS THE PROCESS FOR COMPLAINING ABOUT A BREACH OF PRIVACY?

- 15.1 If you are concerned with the way your personal information has been handled then you are entitled to make a complaint. If you would like to lodge a complaint, please provide details of the incident in writing so that we can investigate it.
- 15.2 Our Privacy Officer will endeavour to resolve your complaint within a timely manner, and deal with your complaint as follows:
- (a) acknowledge receipt of your complaint and provide you with a reasonable timeframe for resolving your complaint;
 - (b) liaise with relevant departments within Alliance Business Technologies, who may assist in resolving your complaint; and
 - (c) provide you with our reasoning of how your complaint has been dealt with.
- 15.3 If we are unable to resolve your complaint, we will advise you to make further inquiries, or make a complaint directly with the Privacy Commissioner.

16. CONTACTING US

- 16.1 We will treat your requests for access or correction and complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in timely and appropriate manner.

Please contact our Privacy Officer at:

Post:

ATT: Privacy Officer

Alliance Business Technologies,
10/a Evans Road,
Salisbury, QLD 4107,
AUSTRALIA

Telephone: +617 1300 705 062

Email: privacy@abtechnologies.com.au

Changes to this policy

From time to time it may be necessary for us to review and revise this privacy policy. We reserve the right to change our privacy policy at any time. Any updated versions of this privacy policy will be posted on our website.

This privacy policy was last updated in January 2020.