

Securenet IT Pty Ltd Privacy Policy

1. Background

This document sets out the policy of Securenet IT Pty Ltd ACN 131 308 864 (Securenet IT Pty Ltd) relating to the protection of the privacy of personal information.

Securenet IT Pty Ltd is committed to protecting the privacy of the personal information it collects and receives. This Privacy Policy seeks to explain how Securenet IT Pty Ltd collects, uses, discloses and otherwise handles personal information. It also seeks to explain how you can ask to access and correct the personal information we hold about you or complain about any suspected privacy breach.

A copy of this Privacy Policy is available on the Securenet IT Pty Ltd website. A printed copy can be obtained free of charge by contacting our Privacy Officer (details under heading 11 below).

1.1. What is personal information?

Personal information means information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is either identified or reasonably identifiable.

Examples include an individual's name, address, contact number and email address.

1.2. Our obligations

Securenet IT Pty Ltd is required to comply with the Australian Privacy Principles (APPs) in the Privacy Act 1988 (Cth) (Privacy Act). The APPs regulate the manner in which personal information is handled throughout its life cycle, from collection/receipt to use and disclosure, storage, accessibility and disposal.

We are also required to comply with other, including more specific privacy legislation in some circumstances, such as:

Applicable legislation of the other national jurisdictions in which Securenet IT Pty Ltd operates; The Spam Act 2003 (Cth) and the Do Not Call Register Act 2006 (Cth).

1.3. Employee records

Securenet IT Pty Ltd is generally exempt from the Privacy Act when it collects and handles employee records. However, Securenet IT Pty Ltd's policy is to protect the personal information of its employees as it does other personal information.

2. The purposes for which we collect, hold, use and disclose personal information

2.1. General

Securenet IT Pty Ltd needs personal information to be able to perform its core functions, including administration of client networks, setup of IT systems, fixing hardware & software issues and providing IT helpdesk support to clients.

Our core services to our clients include IT consultancy, IT helpdesk support and Managed IT Services. The main purposes for which we collect, hold, use and disclose personal information are to provide services to our clients.

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For those above purposes, our activities include:

Administration of Client Networks

- Collecting personal information such as names, addresses, phone numbers & email addresses
- Collecting specific IT related information such as passwords, IP Addresses, serial numbers and other IT related information
- To administer your network in the most efficient manner we install remote access software on your desktops/laptops/tablets & servers. This remote access software allows Securenet IT Pty Ltd to access your Desktop/Laptop/Tablet/Server at any time so that we can perform our day to day duties.

Setting up & administrating managed services

- Collecting personal information such as names, addresses, phone numbers & email addresses
- Collecting financial information such as credit card information & bank details. Please note it is company policy that this information is destroyed once the information is no longer needed.
- Collecting sensitive information such as date of birth, drivers licence numbers. Please note it is company policy that this information is destroyed once the information is no longer needed.

Diagnosing & repairing computers

- Backing up of client data which may contain, personal, sensitive & financial information

2.2. Direct marketing

We may use personal information specifically your name and relevant address details, to let you know about our services, facilities and benefits and those of third party partners/contractors/suppliers of Securenet IT Pty Ltd, where we have your consent. We are not permitted to do so unless we have your consent. We and/or our partners/contractors/suppliers may contact you for direct marketing purposes in a variety of ways, including by mail, email, SMS, telephone, online advertising or facsimile.

For example, where we have your consent, we will send you:

- Periodical newsletters informing you of current & new service offerings
- Notices where a service or product is currently being maintained
- Newsletters informing you of a change in staff working hours, change in rates and general company developments

Opting out

Where you have consented to receiving direct marketing communications from us, your consent will remain current until you advise us otherwise. However, you can opt out at any time, in the following ways:

- Via email – privacy@securenetit.com.au
- Contacting our privacy officer (details under heading 11 below)

3. The kinds of personal information we collect and hold

3.1. General

The type of personal information that Securenet IT Pty Ltd collects generally involves:

We collect information including your company name, first name, last name, address, contact number, address, email address, website, IT related information (such as IP Addresses, passwords, serial numbers)

3.2. Sensitive information

Sensitive information is a subset of personal information that is generally afforded a higher level of privacy protection. Sensitive information includes health and genetic information and information about racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record and some types of biometric information.

Securenet IT Pty Ltd's policy is only to collect sensitive information where it is reasonably necessary for our functions or activities and either:

the individual has consented; or
we are required or authorised by or under law (including applicable privacy legislation) to do so

3.3. Collection of information other than personal information through our website

When you visit the Securenet IT Pty Ltd website, some of the information that is collected about your visit is not personal information, because it does not reveal your identity.

Cookies

A cookie is a small string of information that a website transfers to your browser for identification purposes. The cookies used by Securenet IT Pty Ltd may identify individual users who log into the website (www.securenetit.com.au) .

Most internet browsers are set to accept cookies. If you prefer not to receive them, you can adjust your internet browser to reject cookies, or to notify you when they are being used. There are also software products available that can manage cookies for you. Rejecting cookies can, however, limit the functionality of our website (such as preventing users from logging on and making purchases).

Securenet IT Pty Ltd also uses online behavioural advertising as part of optimising email campaigns based on audience behaviour e.g. reaction or no reaction to a campaign.

3.4. What if you don't want to provide your personal information to us?

Securenet IT Pty Ltd's policy is to provide individuals with the option of not identifying themselves, or of using a pseudonym, when dealing with us if it is lawful and practicable to do so. A pseudonym is a name or other descriptor that is different to an individual's actual name.

For example, Securenet IT Pty Ltd's policy is to enable you to access our website without having to identify yourself.

In some cases however, if you don't provide us with your personal information when requested, we may not be able to respond to your request or provide you with the product or service that you are seeking. For example, you must reveal IT related information so that we can properly administer your IT network.

4. How we collect and hold personal information

4.1. Methods of collection

Securenet IT Pty Ltd is required by the Privacy Act also to collect personal information only by lawful and fair means. It is reasonable and practicable, we will collect personal information we require directly from you.

We collect personal information in a number of ways, including:

- by email;
- over the telephone;
- through written correspondence (such as letters, faxes and emails);
- on hard copy forms (including event registration forms, network registration forms competition entry forms and surveys);
- in person (for example, at job interviews and in exams);
- through our website (for example, if you make an online purchase or complete and submit a web form such as the Update my Profile form or a membership application form, or if you participate in a live chat);
- electronic systems such as Applications;
- from third parties, including:
 - public sources, such as telephone directories, membership lists of business, professional and trade associations, ASIC searches, bankruptcy searches and searches of court registries

4.2. Collection notices

Where Securenet IT Pty Ltd collects personal information directly from you, Securenet IT Pty Ltd's policy is to take reasonable steps to notify you of certain matters. We will do this at or before the time of collection, or as soon as practicable afterwards. The matters include:

our identity and how to contact us;
the fact that this Privacy Policy contains information about how to access and correct personal information and make privacy complaints (and how we will deal with those complaints)

Where Securenet IT Pty Ltd collects information about you from a third party, Securenet IT Pty Ltd's policy is to take reasonable steps to make sure that you are made aware of the collection details listed above and, if you may not be aware that that we have collected the information, of the fact and circumstances of the collection.

4.3. Unsolicited information

Unsolicited personal information is personal information we receive that we have taken no active steps to collect (such as an financial information stored on a PC that we have backed up to perform maintenance on)

We may keep records of unsolicited personal information if the Privacy Act permits it (for example, if the information is reasonably necessary for one or more of our functions or activities). If not, Securenet IT Pty Ltd's policy is to destroy or de-identify the information as soon as practicable, provided it is lawful and reasonable to do so.

When backing up client data our policy is to delete the data after 30 days unless it is unreasonable to do so.

5. Disclosure of personal information to third parties

Under Securenet IT Pty Ltd's policy, personal information may be disclosed to the following third parties where appropriate for the purposes set out under heading 2 above.

government and regulatory bodies

Securenet IT Pty Ltd's contracted service providers, including:

information technology service providers;

external business advisers (such as recruitment advisers, auditors and lawyers)

In the case of these contracted service providers, we may disclose personal information to the service provider and the service provider may in turn provide us with personal information collected from you in the course of providing the relevant products or services.

6. Cross border disclosure of personal information

Securenet IT Pty Ltd operates in Australia

However information may be stored across a number of international jurisdictions. This information includes:

- Information sent via email. Our email service is provided by Microsoft Office 365. Emails are stored centrally on Microsoft datacentres which are located in different geographical regions around the world. For more information please refer to the Office 365 Trust Center which can be found at:

<http://office.microsoft.com/en-au/business/office-365-trust-center-cloud-computing-security-FX103030390.aspx>

7. Use of government related identifiers

Securenet IT Pty Ltd's policy is to not:

use a government related identifier of an individual (such as a Medicare number or driver's licence number) as our own identifier of individuals; or
otherwise use or disclose such a government related identifier,
unless this is permitted by the Privacy Act (for example, where the use or disclosure is required or authorised by or under an Australian law or a court/tribunal order).

8. Data quality and security

8.1. General

We hold personal information in a number of ways, including in electronic databases, email mailboxes, email contact lists, and in paper files held in drawers and cabinets, locked where appropriate. Securenet IT Pty Ltd's policy is to take reasonable steps to:

make sure that the personal information that we collect, use and disclose is accurate, up to date and complete and (in the case of use and disclosure) relevant; and
protect the personal information that we hold from misuse, interference and loss and from unauthorised access, modification or disclosure

You can also help us keep your information up to date; by letting us know about any changes to your personal information, such as your email address or phone number.

8.2. Security

The steps we take to secure the personal information we hold include ICT security (such as encryption, firewalls, anti-virus software and login and password protection), secure office access, personnel security and training and workplace policies.

Payment security

Securenet IT Pty Ltd processes invoice payments through online technologies such as PayPal. Securenet IT Pty Ltd's policy is to ensure that all transactions processed by Securenet IT Pty Ltd meet industry security standards to ensure payment details are protected.

Website security

While Securenet IT Pty Ltd strives to protect the personal information and privacy of website users, we cannot guarantee the security of any information that you disclose online and you disclose that information at your own risk. If you are concerned about sending your information over the internet, you can contact Securenet IT Pty Ltd by telephone or post

Third party websites

Links to third party websites that are not operated or controlled by Securenet IT Pty Ltd are provided for your convenience. Securenet IT Pty Ltd is not responsible for the privacy or security practices of those websites, which are not covered by this Privacy Policy. Third party websites should have their own privacy and security policies, which we encourage you to read before supplying any personal information to them.

9. Access and correction of your personal information

Individuals have a right to request access to the personal information that Securenet IT Pty Ltd holds about them and to request its correction.

Access

Securenet IT Pty Ltd's policy is to provide you with access to your personal information, subject to some exceptions permitted by law. We will also generally provide access in the manner that you have requested (e.g. by providing photocopies or allowing a file to be viewed), provided it is reasonable and practicable for us to do so. We may however charge a fee to cover our reasonable costs of locating the information and providing it to you.

Correction

If you ask us to correct personal information that we hold about you, or if we are satisfied that the personal information we hold is inaccurate, out of date, incomplete, irrelevant or misleading, Securenet IT Pty Ltd's policy is to take reasonable steps to correct that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up-to-date, complete, relevant and not misleading.

If we correct personal information about you, and we have previously disclosed that information to another agency or organisation that is subject to the Privacy Act, you may ask us to notify that other entity. If so, Securenet IT Pty Ltd's policy is to take reasonable steps to do so, unless this would be impracticable or unlawful.

Timeframe for access and correction requests

Except in the case of more complicated requests, we will endeavour to respond to access and correction requests within 30 days.

What if we refuse your request for access or correction?

If we refuse your access or correction request, or if we refuse to give you access in the manner you requested, Securenet IT Pty Ltd's policy is to provide you with a written notice setting out:

the reasons for our refusal (except to the extent that it would be unreasonable to do so); and available complaint mechanisms

In addition, if we refuse to correct personal information in the manner you have requested, you may ask us to associate with the information a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading, and we will take reasonable steps to associate the statement in such a way that will make it apparent to users of the information.

10. Complaints

If you have a complaint about how Securenet IT Pty Ltd has collected or handled your personal information, please contact our Privacy Officer (details under heading 11 below).

11. Further information

Please contact Securenet IT Pty Ltd if you have any queries about the personal information that Securenet IT Pty Ltd holds about you or the way we handle that personal information. Our contact details for privacy queries are set out below.

Privacy Officer
Securenet IT Pty Ltd
Suite 312, 20 Dale Street
Brookvale, NSW 2100
Australia

E: privacy@securenetit.com.au

P: + 61 2 8976 1028

12. Changes to this policy

We may amend this Privacy Policy from time to time. The current version will be posted on our website and a copy may be obtained free of charge from our Privacy Officer.