

PRIVACY POLICY



onPlatinum ICT (ONP) provides a range of IT, communication and multimedia services to businesses. While the relationship with our customers is business to business, it is inevitable that we will collect Personal Information about the owners and employees of our customers, and potential customers, as part of providing these services and going about our business.

The *Privacy Act 1988* and the Australian Privacy Principles govern the way we collect, use, disclose, store, secure and dispose of Personal Information. This Policy outlines how we manage our obligations under these Principles.

Collection of Personal Information

Personal Information will be collected in multiple ways: directly from a customer or potential customer, through our website or customer support channels, from third parties, via registration and enquiry forms, from events that we sponsor or exhibit at, from computer devices we manage and monitor as part of our services to you, or from our own enquiries.

Personal Information collected in the normal course of providing our services will comprise some or all of: your name, work or personal mobile numbers, landline telephone number, job title, work address, work email address, personal email address and computer login/user names.

We may collect additional Personal Information at other times including, but not limited to: the credit rating and credit history of a director, principal or owner of the customer business, from information provided when you respond to surveys, promotions or newsletters, when you provide feedback to us, attend a function organised by us, or provide a credit card or bank account for payment of our services. Where we undertake identity or police checks, we will collect further information such as: date of birth, place of birth, employment history, previous addresses and driver's licence number.

If we collect or disclose Personal Information from / to third parties, this will be done with your consent and we will protect that information as set out in this Policy.

We use software which helps us remotely monitor and troubleshoot faults in the equipment we manage and maintain for you. In the course of remotely monitoring and troubleshooting, we may view files, documents, images or data saved by you or your employees on the equipment. This is purely incidental to the services we provide and we will not use or disclose their content or existence unless required to do so by a law enforcement authority or court order.

Other software used by us to provide services to you will collect information from your computer devices; this may include Personal Information as described above. An example of this type of software is that used for anti-virus and internet security, where this software constantly monitors for threats and potentially malicious activity. Alerts and data about possible cyber threats or malicious activity will be sent to us and the software provider. Any Personal Information collected in the course of this is purely incidental to the services we provide and will not be used or disclosed for any other purpose.

If you choose not to provide the Personal Information we require, or engage with us anonymously or by using a pseudonym, we will not be able to deliver our services to you or deliver them to the standard you expect.

Sensitive Information (as defined in the Act)

In the normal course of providing our services to you, we will not collect Sensitive Information about you. Any Sensitive Information we do collect will be done with your consent and used only for the primary purpose for which it was obtained. Any Sensitive Information collected will be deleted or de-identified when it is no longer required for the purpose it was collected.

Use of Your Personal Information

ONP will use Personal Information collected from you to: provide our services to you, provide information about service interruptions, system upgrades and maintenance, issue invoices and collect debts, verify your credit rating and history, inform you of new and additional services, and develop and improve our products and services.

We will contact you by telephone, email, sms or mail. Where we use your Personal Information to send you information and material of a purely marketing nature, you will have the option to optout of receiving further such communications from us. However, we will continue to send you important news and updates about service interruptions and upgrades affecting the services we provide to you. If you optout of these important communications, you will not be informed of any service interruptions or upgrade; this may affect you or your business.

When We Disclose Your Personal Information

Your Personal Information may be disclosed to persons and organisations outside of onPlatinum ICT, for example, suppliers, contractors and partners who help us deliver our services to you and provide benefits to you as a customer of ours. Only that information essential to deliver the service or benefit to you will be disclosed to these external parties.

We use external providers to process credit card and direct debit payments of our invoices. Your credit card or bank account details will be disclosed to these providers solely for this purpose.

We may also disclose the Personal Information we hold about you to: persons you authorise to contact us on your behalf, credit reporting agencies, debt collection agencies, any government, regulatory, police or other law enforcement agency as required by law, or any other party where we are ordered to by a court.

We take appropriate and reasonable steps to ensure that these external organisations have the necessary privacy and confidentiality procedures in place for the handling of Personal Information we disclose to them.

Your Personal Information will be disclosed to those of our employees involved in providing our services to you.

General information about our customers may be disclosed to a potential purchaser or investor in our business under an agreement to maintain confidentiality. Personal Information of customers that is immaterial to the purchase/sale process will not be disclosed.

If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our customer databases, together with any Personal Information contained in those databases. You will be advised in advance should this circumstance arise.

Security of your Personal Information

ONP is committed to ensuring that the information you provide to us is secure. To prevent unauthorised access or disclosure we have put in place appropriate physical, electronic and managerial procedures to safeguard and secure information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure. We routinely monitor the logs which record access to our information systems, for any unauthorised or improper access.

The transmission and exchange of information between you and us is carried out over public or third party infrastructure. Accordingly, we cannot guarantee the security of any information that you transmit to us, or receive from us over this infrastructure; it is at your risk. Although we take measures to safeguard against unauthorised access and disclosures of information, we cannot assure you that Personal Information we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

Storage of Personal Information

In providing our services to you, we use equipment located in external data centres as well as many software applications which are 'cloud-based'. Accordingly, Personal Information we collect may be stored, processed in, or transferred between us and other parties located in Australia and other

countries. We take all appropriate steps to satisfy ourselves of the security of these cloud-based applications and third party providers and, in turn, the security of any Personal Information stored by them.

We use these external and overseas providers purely to help us provide our services to you; some of these overseas providers may provide services to you or your computer devices under an agreement we have with them. These providers are predominately based in the USA and European Union.

Website and Social Media Pages

When you come to our website (onplatinum.com.au), we may collect certain information such as browser type, operating system, date and time of your visit, the website visited immediately before coming to our site, pages viewed, documents accessed, and demographic information. This information is used in an aggregated manner to analyse how people use our site, and to help us improve our service and marketing activities.

When you engage with us via our business social media pages, we may collect Personal Information as outlined above.

Cookies

We use cookies on our website. Cookies are very small files which a website uses to identify you when you come back to the site and to store details about your use of the site. Cookies are not malicious programs that access or damage your computer. Most web browsers automatically accept cookies but you can choose to reject cookies by changing your browser settings. However, this may prevent you from taking full advantage of our website.

Cookies on our website are used to analyse website traffic and help us provide a better website visitor experience. In addition, cookies may be used to serve relevant ads to website visitors through third party services such as Google Adwords. These ads may appear on this website or other websites you visit.

Third party sites

Our website has links to other websites not owned or controlled by us. These links are for your convenience only and do not constitute sponsorship or endorsement or approval of these websites. onPlatinum ICT is not responsible for the privacy practices of these other websites or the businesses they promote.

Access to your Personal Information

You may request details of any Personal Information that we hold about you in accordance with the *Privacy Act*. We will not charge a fee for providing this information. If you would like a copy of the information we hold about you or believe that any information we hold is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us by telephone on 07 5676 7215, email info@onplatinum.com.au or in writing to onPlatinum ICT, Suite 1402, 203 Robina Town Centre Drive, Robina Qld 4226. We will correct any error or out of date information as soon as we are aware of it.

We can refuse to provide you with Personal Information we hold about you in certain circumstances set out in the Privacy Act.

Complaints about Privacy

If you have a complaint about our privacy practices, please outline your complaint in writing and send it to: onPlatinum ICT, Suite 1402, 203 Robina Town Centre Drive, Robina, Qld 4226, or by email to info@onplatinum.com.au

Your complaint will be investigated promptly by a senior manager of our company. They will provide an initial response within 21 days.

Changes to this Privacy Policy

We may amend or modify this Policy at any time and all modifications will be effective immediately upon our posting of the modifications on our website. Please check the website for the most recent version of our Privacy Policy.

Consent

By providing us with your Personal Information, you consent to the way we collect, use, disclose, store, secure and dispose of your Personal Information as outlined in this Privacy Policy.

onPlatinum ICT® Pty Ltd (ACN 161 584 112)
01 September 2017