

# **Privacy Statement**

## 1. General

- (a) This is the Privacy Statement relating to the website of Saleems Consulting Pty Ltd (trading as SecurlQ') (SecurlQ Website).
- (b) In this Privacy Statement:
  - SecurlQ, Us, We or Our means Saleems Consulting Pty Ltd (ABN 80 145 039 961) (trading as SecurlQ) and each of its related bodies corporate, any of their respective employees or any person contributing to the SecurlQ Website;
  - (ii) SecurlQ Website means the SecurlQ public website with the url: <u>https://www.securiq.com.au</u>.
  - (iii) You, Your or Their means the person accessing the SecurIQ Website, Your agents and Your and their employers and each of their related bodies corporate, and any of their respective employees;
- (c) We understand the importance of protecting Your Personal Information and We are committed to the protection of Your Personal Information.
- (d) This Privacy Statement describes how We collect and use Your Personal Information, who We share it with, and Your choices and rights in relation to Your Personal Information. It applies to Personal Information that We collect from You during Your interactions with Us, whether online, including through the SecurIQ Website (including mobile sites and mobile applications) and social media sites (the SecurIQ Website any communications services and social media sites collectively are referred to in this Privacy Statement as **Sites**), that link to or are referred to in this Privacy Statement, in writing or orally, or personal data that We may collect offline or receive from third parties.
- (e) This Privacy Statement applies in general terms to the collection, storage, use and disclosure by Us of Your Personal Information, and to how You may access Your Personal Information kept by Us or complain about a suspected privacy breach.
- (f) By accessing or otherwise using the Sites and Our products and services, You agree to the terms and conditions of this Privacy Statement, which is incorporated into and forms a part of the <u>Terms and</u> <u>Conditions</u> of the SecurIQ Website and the SecurIQ<u>Terms and Conditions</u>.

## 2. What Personal Information do We collect?

- (a) We collect and use Personal Information from customers, users or visitors of the Sites, or any other individual who interacts with Us, including information or opinions which are reasonably capable of identifying individuals, whether or not such information is true or recorded in a material form (**Personal Information**). The type of Personal Information that We collect and use depends on the type of dealings that You have with Us and includes the following non-exhaustive list:
  - (i) full name;
  - (ii) mobile and telephone number;
  - (iii) email and postal address;
  - (iv) information about the products or services You have ordered;
  - (v) information from enquiries You have made with Us;
  - (vi) the content of any communications between You and Us;
  - (vii) log-in and account information for authentication purposes and access;
  - (viii) any other Personal Information provided by You to Us when making an enquiry or subscribing to Our products, services and/or the Sites.
- (b) We may also collect other information that does not personally identify You. Such other information includes browser and device information, website and application usage data, IP addresses, demographic information such as marketing preferences, geographic location, primary language, and information collected through cookies and other technologies or information that has been anonymised or aggregated. If We link this information with Your Personal Information, We will treat that linked information as Personal Information.

- (c) You can choose not to provide Personal Information to Us when requested. However, if this is necessary to provide You with access to Our Sites or Our products and services, or to perform administrative functions, We may be unable to do these things.
- (d) We do not intend to collect sensitive personal data about You, e.g. information relating to Your health, religion, political beliefs, race or sexual orientation and ask that You do not send or provide this information to Us.

# 3. How do We collect Personal Information?

- (a) We collect Personal Information about You in a number of ways, including:
  - (i) directly from You when You:
    - A. order products or services from Us;
    - B. visit Our Sites or submit information through Our Sites;
    - C. contact Us with a query or request information about Our products or services, or provide feedback;
    - D. participate in surveys or promotions; or
    - E. when you register for our events, workshops and seminars or subscribe to our mailing lists and newsletters;
  - (ii) from third parties (including related bodies corporate, business partners, service providers, customers, employees, contractors, suppliers, consumers, and other users of the Sites);
  - (iii) from publicly available sources of information (including, but not limited to, social media sites, public databases, third parties that provide list enhancement or similar services); and
  - (iv) when otherwise legally authorised or required to do so by law.

# 4. How do We use Your Personal Information?

- (a) We use Your Personal Information for the purposes for which the information is collected.
- (b) We use Your Personal Information to provide Our products, services and Sites to You and to monitor your use of the Sites. We also use it to improve or develop Our products, services and Sites, to operate, maintain, test and upgrade Our systems and to notify You of opportunities that We think You might be interested in.
- (c) We may provide Your Personal Information to Our related bodies corporate, business partners, joint venture partners, commercial partners, service providers, sponsors, third party contractors, agents or suppliers and to authorised third party service providers who perform functions on Our behalf, such as marketing and analysis organisations, hosting companies, Web developers, internet service providers, telecommunication providers, customer service providers, customer support specialists, fulfilment companies, external business advisors (such as auditors and lawyers), research and data analysis firms, debt collectors and insurers (**Partners and Affiliates**). In all circumstances where Your Personal Information is disclosed to Our Partners and Affiliates, We will ensure that these Partners and Affiliates undertake to protect Your privacy.
- (d) We may also use Your Personal Information to:
  - (i) provide or deliver products or services to You;
  - (ii) administer and manage Our products and services;
  - (iii) perform administrative and business functions and internal reporting;
  - (iv) inform You about Our Sites, products, services, special offers, promotions, questionnaires or surveys or other matters which We believe may be of interest to You;
  - (v) obtain feedback from You about Our Sites, products and services;
  - (vi) charge and bill You for the use of Our products and services;
  - (vii) provide You with a more personalised experience when You interact with Us;
  - (viii) enable You to subscribe to Our newsletters and mailing lists;
  - (ix) enable You to register for Our events, workshops and seminars;
  - (x) assess the performance of the Sites and to improve their operation;
  - (xi) customise the content on our Sites and to contact You about Our products and services;
  - (xii) share with Partners and Affiliates;
  - (xiii) verify Your identity;
  - (xiv) update our records and keep contact details up to date;
  - (xv) achieve our business purposes and analyse information, for example, to:

- A. establish, manage, and maintain our business relationship with you;
- B. compile usage statistics for Our Sites;
- C. process and respond to privacy requests, questions, concerns and complaints; and
- D. fulfil legal and contractual obligations.
- (e) We may disclose Personal Information to a Partner or Affiliate and they may in turn provide Us with Personal Information collected from You.
- (f) We engage in these activities to manage Our contractual relationship with You, to comply with Our legal obligations, or for Our legitimate business interests.

# 5. When do We disclose Your Personal Information?

- (a) Our Site may allow You to publish and display content and information which is made available and accessible to other users of the Sites.
- (b) We may disclose any information, including Personal Information, We deem necessary, in our sole discretion:
  - (i) to Our Partners and Affiliates to perform functions consistent with our Privacy Statement on our behalf;
  - (ii) to third party providers of goods and services with whom We have a commercial relationship;
  - (iii) with goods and service providers to provide operational services or goods or facilitate transactions on Our behalf, including but not limited to processing of orders, assisting with sales-related activities or post-sales support, client support, email delivery, data analytics and auditing;
  - (iv) where You consent to the sharing of Your Personal Information;
  - in connection with, any joint venture, merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of Our businesses by or to another company;
  - (vi) for other legal reasons;
  - (vii) to law enforcement bodies or regulatory authorities to assist with their functions, courts of law or as otherwise required or authorised by law.
- (c) We may also share non-personal, de-identified and aggregated information for research or promotional purposes. We may disclose Personal Information to a Partner or Affiliate and they may in turn provide Us with Personal Information collected from You.

# 6. Direct Marketing

- (a) Where We have Your express or implied consent, or where We are otherwise permitted by law, We may use Your Personal Information to send You direct marketing communications about the products and services We offer, as well as other information. We may send this information in a variety of ways, such as by mail, email, SMS, telephone, social media or by customising online content and displaying advertising on our Sites.
- (b) You may opt out of receiving direct marketing material from Us at any time and manage Your communication preferences by:
  - (i) following the unsubscribe instructions included in each marketing email or SMS text message from us;
  - (ii) sending an email to info@securiq.com.au,

including Your details and a description of the marketing material You no longer wish to receive from Us. We will comply with Your request as soon as is reasonably practicable.

(c) If You opt out of receiving marketing related communications from Us, We may still send You administrative messages as part of Your ongoing use of Our products and services, which You will be unable to opt out of.

# 7. Our Sites

- (a) When You visit Our Sites, Our systems may record certain information about Your use of Our Sites (such as which Web pages You visit and the time and date of Your visit). We use this information to help analyse and improve the performance of Our Sites.
- (b) In addition, We may use "cookies" on Our Sites. Cookies are small text files that help a website to remember Your preferences and improve Your experience of using that website. Using cookies is standard practice for most large websites. In some cases, the cookies that We may use may collect some Personal Information about You. We will treat this information in the same way as other Personal Information We collect about You. If You prefer, You may be able to disable cookies on Your internet browser. However, if You do so, You will not be able to enjoy the enhanced user experience that our cookies may offer.
- (c) We may also collect Internet Protocol (IP) addresses relating to You when You access and use the Sites. IP addresses are assigned to computers on the internet to uniquely identify them within the global network of computers which makes up the internet. We may collect and manage IP addresses for internet session management and security purposes.

## 8. Third party websites and advertising

- (a) Our Sites may contain links to other websites. Please be aware that We are not responsible for the privacy practices or the content of such other websites and We make no representations or warranties in relation to the privacy practices or content of any third party websites and applications. We encourage Our users to read the privacy statements of each and every website they visit.
- (b) This Privacy Statement applies solely to information collected by Us through Our Sites and does not apply to these third-party websites. The ability to access information of third-parties from Our Sites, or links to other websites or locations, is for Your convenience and does not signify Our endorsement of such third-parties, their products, their services, other websites or their content.

# 9. Security and storage

- (a) Your Personal Information may be stored in storage facilities (owned and operated either by Us or Our services providers) in hard copy or electronic format. We will use Our reasonable endeavours to store Your Personal Information securely and to make Our Sites and storage facilities as secure as possible against unauthorised access.
- (b) We will use Our commercially reasonable endeavours to protect and maintain the security of Your Personal Information. Our officers, employees, agents and third party contractors are expected to observe the confidentiality of Your Personal Information.
- (c) Despite Our commercially reasonable endeavours, We are unable to ensure or warrant the security of any Personal Information transmitted to Us via the internet. Accordingly, all Personal Information disclosed by You to us is at Your own risk and We are not liable for any unauthorised access to and disclosures of the Personal Information.
- (d) If We determine that Personal Information is no longer needed for any purpose, We will take commercially reasonable steps to destroy or permanently de-identify that Personal Information, unless We are required by law or a court or tribunal to retain the information.

## 10. Access to Your Personal Information

- (a) We will use Our commercially reasonable endeavours to keep Your Personal Information that We collect accurate, up-to-date and complete. If You find that the Personal Information We hold about You is inaccurate, incomplete or out-of-date, please contact Us immediately (Our contact details are set out below) and We will take reasonable steps to ensure that it is corrected.
- (b) Subject to some exceptions provided by law, You have the right to access Your Personal Information. If You wish to access or change Personal Information which We have collected about You, We require You to put Your request in writing to us. Proof of identity may be required before such information will be provided. If We do not allow You access to any part of the Personal Information We hold about You, We will tell You why. We will not charge You for lodging a request to access Your Personal Information, but We may charge You for Our reasonable costs in supplying You with access to this information.

## 11. Retaining Your Personal Information

(a) We will retain Your Personal Information for as long as is necessary to fulfil the purpose for which it was collected unless a longer retention period is required to comply with legal obligations, resolve

disputes, protect Our assets, or enforce agreements. The criteria We use to determine retention periods include whether:

- We are under a legal, contractual or other obligation to retain Personal Information, or as part of an investigation or for litigation purposes;
- (ii) Personal Information is needed to maintain accurate business and financial records;
- (iii) there are automated means to enable You to access and delete Your Personal Information at any time;
- (iv) the Personal Information is sensitive personal data in which event We will generally retain this for a shorter period of time;
- (v) You have consented to Us retaining Your Personal Information for a longer retention period, in which case, We will retain Your Personal Information in line with Your consent.

#### 12. How to contact us

- (a) If You would like to access the Personal Information that We hold about You, have any questions in relation to this Privacy Statement or have a complaint, You can contact us in any of the following ways:
  - (i) through the Site, by clicking on the <u>Contact Us</u> option; or
  - (ii) by e-mail: info@securiq.com.au
- (b) We take all privacy complaints seriously and We will investigate Your complaint in a confidential manner and You will be informed of the outcome of the investigation within a reasonable period of time.

#### 13. Changes to our Privacy Statement

- (a) We may, in our sole discretion, amend or update this Privacy Statement from time to time. If We do, We will update the "last modified" section at the bottom of this Privacy Statement. The current version of Our Privacy Statement will be posted on our Sites and a copy may be obtained from Our Privacy Officer, and any changes will be effective when posted on, or via, the Sites.
- (b) Your continued use of Our products, services or Sites following any such amendment will be confirmation of Your acceptance of the amendments. We reserve the right to modify this Privacy Statement at any time, so please review it frequently.

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