

PRIVACY POLICY OF IWEB SYSTEMS PTY LIMITED



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PRIVACY POLICY

1. YOUR PRIVACY IS IMPORTANT TO US

- 1.1 This document comprises the Privacy Policy of iWeb Systems Pty Limited ACN 605 303 302 ("**iWeb Systems**"), and outlines the manner in which we collect, use, disclose and manage personal information.
- 1.2 We treat your privacy very seriously and recognise the importance of protecting personal information at all times.
- 1.3 iWeb Systems is committed to ensuring the privacy of the personal information you have provided to us. We are bound by the Australian Privacy Principles ("**APPs**"), established under the *Privacy Act* 1998 ("**Act**").

2. HOW DO WE COLLECT PERSONAL INFORMATION?

- 2.1 Through our IT consultancy business, we may collect personal information from you from a variety of sources, including not limited to when you:
 - (a) Inquire about our products and services;
 - (b) Use our products and services;
 - (c) Subscribe to receive our alerts, newsletters or other publications, completing forms, or participating in surveys, research, promotions and competitions on our website;
 - (d) Contact us for any reason including, but not limited to, reporting a problem with our website, requesting further services or seeking our assistance; and
 - (e) Apply for employment with us directly, via an SNS site (eg. LinkedIn) or through your nominated referees.
- 2.2 Note that this list is not exhaustive as there may be other situations or circumstances in which we may be required to collect personal information from you. We will endeavour to notify you when we collect your personal information before, during or as soon as practicable. We will not collect any personal information from you except when you have knowingly provided that information to us or you have authorised a third party to provide that information to us.
- 2.2 We may also be required to collect your personal information as a consequence of a legal or regulatory requirement such as under the Privacy Act and APPs.

3. TYPES OF INFORMATION WE MAY COLLECT

- 3.1 The information collected will generally be records of information that identifies you, such as your name, date of birth, address, telephone number, email, ID copy, or any other information that may be required for payment or identification purposes.
- 3.2 If you do not provide us with the information asked for we may not be able to provide the product or service you have requested.

4. USE OF YOUR PERSONAL INFORMATION

- 4.1 We will only collect personal information that is reasonably necessary for, or directly related to, one or more of our functions and activities such as provision of the products and services you have requested. As a general rule we do not collect sensitive information. However if we do, we will seek your consent before collection.
- 4.2 We will not use information about you other than for a purpose made known to you, a purpose you would reasonably expect, a purpose required, authorised or permitted by law, or a purpose otherwise authorised by you. These purposes include:
 - (a) Verification of your identity in order to provide the products or services you have requested;
 - (b) Administration of those products and services;
 - (c) Compliance with laws and regulations; and
 - (d) Providing you with information about products and services that are most relevant to you.

5. DISCLOSURE OF YOUR PERSONAL INFORMATION

- 5.1 We may disclose your personal information in the following circumstances:
 - (a) Where we have contracted an external organisation to provide us with support services. Such services may include but are not limited to processing applications or orders, marketing support, market research, debt collection, insurance, information technology arrangements, records management, regulatory monitoring, auditing, compliance and screening.
 - (b) To related companies within the iWeb Systems Group with an intention to better understand your needs and provide you with information about products and services from across the iWeb Systems Group that are most relevant to you;
 - (c) To comply with our legal obligations, such as under the Privacy Act and APPs; and
 - (d) Where we suspect that unlawful activity has been or may be engaged in and the personal information is a necessary part of our investigation or reporting of the matter.
- 5.2 We may disclose your personal information only with your consent in the following circumstances:
 - (a) Where organisations cooperate with us in offering products and services;
 - (b) To service providers such as credit reporting agencies in order to conduct credit and/or compliance verification checks; and
 - (c) To anyone else you authorise us to disclose information to, from time to time.
- 5.3 Only information pertinent to the supply of our products or services is provided and strict confidentiality requirements are adhered to. Where personal information is disclosed to an external company operating in a foreign country, we will take all reasonable steps to

ensure that the overseas recipient does not breach the APPs in relation to your information.

6. QUALITY OF PERSONAL INFORMATION

- 6.1 We collect and verify your information directly from you, or from independent specialist sources, thereby upholding the quality and accuracy of your personal information.
- 6.2 Before we use or disclose your personal information, we will take reasonable steps to ensure that your personal information is accurate, complete, relevant, up-to-date, and is not misleading. If you believe the information we hold about you is inaccurate, incomplete or out-of-date, contact us and we will endeavour to either correct the information in our systems, or if necessary, discuss alternative action.

7. STORAGE AND SECURITY OF INFORMATION

- 7.1 We are committed to keeping secure the personal information you have provided to us. We will take all reasonable steps to protect your personal information from loss, misuse, unauthorised access, modification or disclosure. For example, your personal information is stored in secure premises and access to these premises is strictly controlled.
- 7.2 We understand that our customers require peace of mind when it comes to the security of using the Internet. We use modern security measures such as secure firewalls, servers, databases and data encryption to safeguard the personal information provided by you.
- 7.3 We will not keep your information for longer than necessary, and where we no longer need your information, we will take reasonable steps to destroy or de-identify it.

8. ACCESS AND CORRECTION OF YOUR PERSONAL INFORMATION

- 8.1 You have the right to access the personal information we hold about you.
- 8.2 If you wish to access your information then we ask you to contact us. We will need to verify your identity prior to meeting your requests. Unless a lawful exception applies, we will endeavour to grant you access to personal information which we hold about you within 30 days.
- 8.3 If you find that the information we hold about you is inaccurate or out-of-date then we will endeavour to correct it within 30 days upon receiving your request in writing.
- 8.4 In the event that we are unable to grant you access to your personal information, or are unable to correct your personal information, we will provide you with a written explanation as well as the complaint mechanism available to you. Exceptions to this include:
 - (a) where providing access will provide a serious threat to life or health of any individual or pose an unreasonable impact on the privacy of an individual;
 - (b) your request for access or correction is frivolous or vexatious;
 - (c) where information relates to existing legal proceedings between us and you; or
 - (d) where providing access would be unlawful or may prejudice an investigation of possible unlawful activity.

9. CHANGES TO THIS POLICY

- 9.1 iWeb Systems may make changes to this Policy from time to time and for any reason including, but not limited to, the introduction of new legislation.
- 9.2 Any changes to this Policy will be updated regularly through brochures and/or our website.

10. LINKS TO EXTERNAL SITES

- 10.1 Our website may contain links to other websites whose operators may or may not adhere to a Privacy Policy or be governed by privacy laws. We are not responsible for the content or practices of websites operated by third parties that are linked to our sites. These links are for the user's convenience only. Links to third party sites do not constitute approval by us of the content, policies or practices of those third party sites. Once you have left our site via such a link, you should check the applicable Privacy Policy of that site.
- 10.2 We may establish relationships with business partners that allow visitors to our website to link directly to sites operated by these partners. Some of these sites may be "cobranded" with iWeb Systems; however these sites may not be operated or maintained by us or on our behalf. These sites may collect personal information from you that may be shared with us.
- 10.3 This Privacy Policy will apply to any personal information we obtain in this manner.

11. USE OF COOKIES, WEB BEACONS & OTHER SOFTWARE

- 11.1 We use cookies, web beacons and measurement software and tools on our website. Our service providers, business partners and other associated third parties also do the same. We use and disclose the information collected through the use of cookies, web beacons and measurement software and tools in accordance with this Privacy Policy.
- 11.2 A cookie is a small amount of data that is sent to your computer or mobile device browser and is stored on your device's hard drive. Please note unless you have adjusted your browser settings to refuse cookies, our system will automatically issue cookies when you access our website. A notification is displayed on our website to alert you of the use of cookies.
- 11.3 We use cookie information to track usage patterns and provide us with statistics to analyse and improve our website for a better browsing and usage experience. Such information can be the number of users who visit our site, the date and time of visits, the number and type of pages viewed and navigation patterns.
- 11.4 Cookies do not identify individual users, although they do identify a user's browser type, Internet Protocol address, location, screen size, etc. You have the ability to configure your browser to accept or decline all cookies or notify you when a cookie is sent. If you disable or reject some or all cookies you may not be able to view or use parts of our website, and you may not have full access to all of the applications and information on our website.

12. HOW TO OPT OUT OF MARKETING ACTIVITIES

12.1 You may be contacted by mail, telephone or email regarding our products, promotions, newsletters, customer surveys and similar materials that we may conduct or distribute from time to time. If you do not wish to receive any such communications, you may advise us that you wish to opt out:

- (a) By utilising the unsubscribe (opt-out) functionality or link provided in the direct marketing communications we send you;
- (b) by sending us an email to info@iwebsystems.com.au; or
- (c) by mail addressed to the Privacy Officer, iWeb Systems Pty Ltd, PO Box 470, Ryde NSW 1680.

13. LODGING A PRIVACY COMPLAINT

- 13.1 While we will always strive to do our best, we recognize that we are not perfect: there will be times when we may not meet your service expectations. We are, however, fully committed to providing you with a fair and efficient process for the handling of any complaints that you might have.
- 13.2 If you wish to complain about any breach or potential breach of this Policy or the APPs, you should contact us and request that your complaint be directed to the Privacy Officer.
- 13.3 We will use our best endeavours to respond and resolve any complaint to your reasonable satisfaction. If you are unhappy with our response, you may apply to the Office of the Australian Information Commissioner (OAIC) to have your complaint investigated.
- 13.4 For more information on how you may lodge a complaint with the OAIC, please contact the Commissioner's hotline service on 1300 363 992, or visit their website on www.oaic.gov.au.

14. HOW TO CONTACT US

- 14.1 For more information please see our website www.iwebsystems.com.au.
- 14.2 If you have any privacy-related enquiries, you may contact us by:
 - (a) calling us on: 1300 651 153;
 - (b) sending an email to: info@iwebsystems.com.au; or
 - (c) Mail addressed to: Privacy Officer, iWeb Systems Pty Ltd, PO Box 470, Ryde NSW 1680

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