

Privacy Policy

In this Privacy Policy, 'us' 'we' or 'our' means **NCSI (Australia) Pty Limited ACN 089 983 317** and our related bodies corporate. We are committed to respecting your privacy. Our Privacy Policy sets out how we collect, use, store and disclose your personal information.

By providing personal information to use, you consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy and any other arrangements that apply between us.

Personal information includes information or an opinion about an individual that is reasonably identifiable. For example, it may include your name, age, gender, postcode and contact details. It may also include financial information, including your credit card information.

What personal information do we collect?

We may collect any personal information that may be required to assist your details and interactions with us, including (but not limited to):

- financial information (including bank account details, your income and credit standing);
- information about your preferences or requirements that are relevant to our services and offerings;
- information about your identity (including name, date of birth, gender, visa or residency status, identification documents, address, email, telephone and mobile number);
- your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;
- details of the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries;
- any additional information relating to you that you provide to us directly through our website or app or indirectly through your use of our Wi-Fi services, our website or app or online presence or through other websites or accounts from which you permit us to collect information;
- information you provide to us through surveys; or
- any other personal information that may be required in order to facilitate your dealings with us.

How do we collect personal information?

We generally collect personal information in the following ways:

- directly, or indirectly from you (when you interact with us);
- indirectly from you, when you communicate with us by telephone, mobile, email, face to face or through online and social media interactions;
- when you share information with us from other social apps, services, or websites
- when you participate in our surveys;
- when you use our Wi-Fi services, our website, services and content; or
- when you invest in our business or enquire as to a potential purchase in our business (and vice versa)

Your personal information may also be collected from third parties, such as:

- credit reporting bodies, law enforcement and government entities;
- medical professionals (for example, if you are involved in an accident);
- marketing agencies, data collection and research organizations; and
- other individuals.

In addition, when you apply for a job or position with us, we may collect certain information from you (including your name, contact details, working history and relevant record checks) from any recruitment consultant, your previous employers and others who may be able to provide information to us to assist in our decision on whether or not to make you an offer of employment or engage you under a contract.

No obligation

You do not have to provide personal information to us. You can choose to deal with us anonymously. However, if you decide not to provide your personal information, we may not be able to provide you with products, services or offerings that are tailored to your needs.

Why do we collect, use and disclose personal information?

We may collect, hold, use and disclose your personal information for the following purposes:

- to enable you to access and use our website, services and offerings;
- to operate, protect, improve and optimize our Wi-Fi networks, our website, services and offerings, business and our customer's experience, such as perform analytics, conduct research and for advertising and marketing;
- to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- to send you marketing and promotional messages and other information that may be of interest to you, including information sent by, or on behalf of, our business partners that we think you may find interesting;
- to administer rewards, surveys, contests, or other promotional activities or events sponsored or managed by us or our business partners;
- to do business with you;
- to investigate incidents (including potential incidents) which occur on or at our premises;
- to comply with our legal obligations, resolve any disputes that we may have with any of our customers or suppliers, and enforce our agreements with third parties; and
- to consider your employment application.

We may also disclose your personal information to a trusted third party who also holds other information about you. This third party may combine that information in order to enable it and us to develop anonymized consumer insights so that we can better understand your preferences and interests, personalize your experience and enhance the products and services that you receive.

We will not use or disclose your personal information for any purpose other than the purpose it was collected for (or a related purpose) unless we first obtain your consent to that purpose, or we are permitted to do so by law.

Free Wi-Fi Service

We may offer free Wi-Fi service at certain office premises. If you are carrying a Wi-Fi enabled device within range of one of our Wi-Fi networks, we may pick up certain data that is transmitted from your device whether or not you join our Wi-Fi network, including:

- your device ID, device type, IP address and MAC address;
- geo- location information and any movement of your device throughout our premises;
- any other information which you may voluntarily provide to us while accessing our Wi-Fi networks, for example, your name, electronic mail address, the details of the websites or apps whilst you are connected to our network.

We may also link this type of information to your provided personal information if we hold a common identifier such as your unique device identifier.

In each case, we will only use information or data collected via our free Wi-Fi network service in accordance with, and for the purposes set out in this Policy, or as permitted by law.

If you do not want this information collected, you can disable Wi-Fi and Bluetooth on your device and should not sign into the Wi-Fi network.

Do we use your personal information for direct marketing?

We and/or our carefully selected business partners may send you direct marketing communications and information about our services, products and offerings. This may take the form of emails, SMS, mail or other forms of communication, in accordance with the *Spam Act 2003 (Cth)* and the *Privacy Act 1988 (Cth)*. You may opt-out of receiving marketing materials from us by contacting us using the details set out below or by using the opt-out facilities provided (for example, an unsubscribe link).

When you provide us with your contact details, you consent for us and our business partners to send you direct marketing communications and information.

You can unsubscribe from any, or all, of the direct marketing communications at anytime by contacting us using the details set out below. For electronic mail communications, you will be able to find a link to unsubscribe, usually towards the bottom of the email.

If we are providing products or services to you, there may still be a requirement for certain communications to be made to you in providing these services or products as required by law.

To whom do we disclose your personal information?

We may disclose personal information for the purposes described in this privacy policy to:

- our employees and related bodies corporate;
- third party suppliers and service providers (including providers for the operation of our websites and/or our business or in connection with providing our products and services to you);
- professional advisers, dealers and agents;
- our existing or potential agents, business partners or partners;
- our sponsors or promoters of any competition that we conduct via our services;
- anyone to whom our assets or business (or any part of them) are transferred;
- specific third parties authorized by you to received information held by us; and/or
- other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorized or permitted by law.

Disclosure of personal information outside of Australia

We are a wholly owned subsidiary of Singapore Telecommunications Limited (incorporated in the Republic of Singapore) Company Registration Number 199201624D. We may disclose personal information outside of Australia to our parent company and related bodies corporate (operating

globally). We may also disclose your personal information to third party suppliers and cloud providers located outside of Australia where necessary to improve or give effect to products and services that you receive from us.

When you provide your personal information to use, you consent to the disclosure of your information outside of Australia and acknowledge that we are not required to ensure that the overseas recipients handle that personal information in compliance with Australian Privacy Law. We will, however, take reasonable steps to ensure that any overseas recipient will deal with such personal information in a way that is consistent with the Australian Privacy Principles.

Using our website and cookies

We may collect personal information about you when you use and access our website.

While we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit and the internal protocol address assigned to your computer.

We may also use 'cookies' or other similar tracking technologies on our website that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, television, mobile phone or other device. They enable the entity that put the cookie on your device to recognize you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser, but our websites may not work as intended for you if you do so.

We may also use cookies to enable us to collect data that may include personal information. For example, where a cookie is linked to your account, it will be considered personal information under the Privacy Act. We will handle any personal information collected by cookies in the same way that we handle all other personal information as described in this Privacy Policy.

Security

We may hold your personal information in either electronic or hard copy form. We take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorized access, modification or disclosure and we use several physical, administrative, personnel and technical measures to protect your personal information. For example:

- staff training on applicable privacy laws and how to keep your information safe and secure;
- systems and safeguards to prevent security breaches in our network and database systems (such as firewalls, virus scanning software tools, strict verification processes to prevent unauthorized access to personal information);
- storage on secure premises;
- limiting access to personal information to a need-to-know basis;
- destroying any personal information when we no longer need it;
- encrypting personal information before sharing it; and
- retaining personal information for only as long as there is a business, legal or regulatory reason to do so.

However, given the nature of the internet, there is always a risk that an unauthorized party may find ways to overcome our security measures, and it is not possible to guarantee the security of your personal information. You should also be aware that electronic mail communications are usually not

encrypted and should not be considered secure. Where required by law, we will notify you and the relevant authorities of data breaches affecting your personal information.

Links

Our website may contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policy that apply to those websites may differ substantially from our Privacy Policy, so we encourage you to read them before using those websites.

Accessing or correcting your personal information

You can access the personal information we hold about you by contacting us using the information below. Sometimes, we may not be able to provide you with access to all of your personal information and, where this is the case, we will tell you why. We may also need to verify your identity when you request your personal information.

If you think that any personal information we hold about you is inaccurate, please contact us and we will take reasonable steps to ensure it is corrected.

Making a complaint

If you think we have breached the Privacy Act, or you wish to make a complaint about the way we have handled your personal information, you can contact us using the details set out below. Please include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint within a reasonable period of time.

If you think that we have failed to resolve the complaint satisfactorily, you can contact the Office of the Australian Information Commissioner:

- by telephone to 1300 363 992;
- by email to enquiries@oaic.gov.au; or
- by post to: Office of the Australian Information Commissioner, GPO Box 5218, Sydney NSW 2000.

Please visit the Office of the Australian Commissioner's website at www.oaic.gov.au for further information.

Contact us

For further information about our Privacy Policy or practices, or to access or correct your personal information, or to unsubscribe from our direct marketing communications, or to make a complaint, please contact us using the details set out below:

- via the 'Contact Us' page on our website [\[insert\]](#); or
- by post to: NCSI (Australia) Pty Limited, 1 Lyonpark Road, Macquarie Park NSW 2113.

Changes to our Privacy Policy

We may update our Privacy Policy from time to time to take into account new laws and technology, and changes to our business or operational practices. The most current version of this Privacy Policy is

available on our website [\[insert\]](#) and we encourage you to check periodically to ensure that you have the most up to date version.

Effective: July 2021