

GCOMM Pty Ltd Privacy Policy

GCOMM Pty Ltd (“we”, “our” or “us”) respects your right to privacy (“you” and “your”) and we are committed to protecting your personal information. This Privacy Policy explains how we collect, use and manage your personal information in accordance with the Australian Privacy Principles (“APP”) and the *Privacy Act 1988* (Cth) (collectively the “Privacy Act”).

About this Privacy Policy

This Policy explains the following:

- the kinds of personal information that we collect and hold about you;
- how we collect your personal information;
- how we hold your personal information;
- the purposes for collecting, holding, using and disclosing your personal information;
- how you may access your personal information held by us and seek corrections to that information;
- how you make a complaint about the way we collect, hold, use or disclose personal information, and how we will deal with privacy-related complaints; and
- whether we will or are likely to disclose your personal information to overseas recipients and the countries where such recipients may be located.

What We Collect

We will collect and hold information on the individuals that we interact with that is reasonably necessary for the activities and functions of our business. We will collect and hold the name and contact details of the individuals that we deal with, including individuals who are customers, prospective customers, prospective employees, suppliers, resellers, service providers, partners and contractors.

To satisfy our obligations under the laws under which we operate, we may need to retain your information after a particular transaction has ended. We will only hold your personal information that identifies you for as long as reasonably necessary and permitted under Australian law.

Sensitive information is personal information about a person’s racial or ethnic origin, political opinion, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, genetic information or health information. We will not collect, use or disclose sensitive information about you unless we need the information for one of our functions or activities and we have your consent (or we are legally required to do so).

We allow you to interact with the www.gcomm.com.au website anonymously and use a pseudonym if the inquiry is general in nature. If you wish to interact with us in relation to business that you are doing with us, then we will need to identify you before we engage with you. If you wish to obtain information from us about our software products, solutions and services, then through our website we will ask for your name, email address and company name and if you call our offices or email us, we will ask for similar information.

How We Collect Your Personal Information

We will collect personal information directly from you in person or by telephone, email, the Internet, fax or when you complete an inquiry or contact form on our website.

In some situations, we may collect your personal information from one of our related companies or from a third party. We will only do this where it is impracticable or unreasonable for us to collect it directly from you. Like most businesses, we may collect personal information about you from recruitment consultants, suppliers, resellers, service

providers, partners, someone that you have authorised to act on your behalf or from one of our related or associated companies or businesses in Australia or overseas.

How We Hold Your Personal Information

We protect your personal information from unauthorised access, modification, misuse, interference and loss. We do this by:

- securing all personal information;
- limiting access to those people in our company that need access; and
- using firewalls and other Internet security measures (such as identification codes and passwords) to control access to our computer systems.

Why We Collect, Hold, Use and Disclose

We collect, hold, use and disclose your personal information so that we can perform our functions and activities and manage and administer our business, which involves offering software products, solutions and services to our customers, who may be businesses or individuals. If we did not collect your personal information, then we may not be able to deal with you and provide you with our products, solutions and services.

If you are a customer or employee of a customer, then we hold your personal information in order to communicate with you and notify you of information about the products or services that you have obtained from us. We also hold your personal information in order to identify you when you communicate with us. You may also be a contractor, prospective employee, supplier, reseller, service provider, partner or a party with whom we do or have done business, or may do business with in the future and we hold your personal information for communication and identification purposes.

We will seek your consent if we need to use your personal information for a purpose that is not related to the purpose for which we originally collected your information.

Direct Marketing

As part of our service to you, we may use your personal information that we have collected to inform you about a product, solution or service that may be of benefit to you. We may send you marketing materials about products, solutions or services that may be of interest or send you notifications in relation to the products and services that you are currently using.

If you do not want your personal information to be used for direct marketing purposes, please use the "Contact Us" form on our website and "opt out" of receiving our direct marketing. Once you notify us that you want to opt out, we will remove you from our mailing lists.

How You Gain Access to Your Personal Information

You are entitled to find out what personal information we hold about you. The simplest way is to telephone one of our offices and ask to speak to one of our sales or customer service representatives. If your request is complex, then we may ask that you make the request in writing. You can make the request by email to privacy@gcomm.com.au.

If you believe that the information that we hold about you is inaccurate, incomplete or out-of-date, then please let us know so that we can promptly correct it. You can ask us to correct your personal information by email to privacy@gcomm.com.au.

In certain situations, we may not agree to a request to correct information we hold about you. If this occurs, we will advise you of this and our reason for not agreeing to the correction request.

Resolving Your Concerns

You may make a complaint about our handling of personal information if you believe that your privacy has been compromised or that we have breached the Privacy Act. If you have a privacy complaint, please contact the person at the relevant company that you have been

dealing with by telephone or email. Alternatively, you can make a complaint by email to privacy@gcomm.com.au.

If the complaint remains unresolved, you may refer the matter to the Office of the Australian Information Commissioner (the "OAIC"). The contact details for the OAIC are:

The Office of the Australian Information Commissioner
GPO Box 2999
Canberra ACT 2601
Australia
Phone: 1300 363 992
Fax: 02 9284 9666
Website: www.oaic.gov.au

Whether We Hold Information Overseas and Where

To offer you the best possible service, we will from time to time share your personal information with our related companies, some of whom are located overseas. We may also disclose personal information to organisations located overseas who are our service providers or we may use cloud-based services that have data centres overseas.

These related companies, overseas service providers and data centres are located in the USA, Japan, Singapore and Serbia.

Use of Our Website

We may collect non-personal information from you when you use our website such as your browser type, operating system and web pages visited in order to help us manage and optimise our website. We may use "cookies" and other Internet technologies to manage our website. A "cookie" is a packet of information that allows our website server to identify and interact more effectively with your computer. When you access our website, we may send you a temporary or "**session cookie**" that gives you a unique identification number. A different identification number is sent each time you use our website. Shortly after you complete your interaction with our website, the cookie expires or "crumbles". This means it no longer exists on your computer and therefore cannot be used for further identification or access to your computer.

Our website may also contain links to websites of third parties. We provide these links for convenience only and you should be aware that the privacy policies and information handling practices of these other websites may differ from ours. As a result, we cannot guarantee the privacy practices of other websites to which we provide a link.

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