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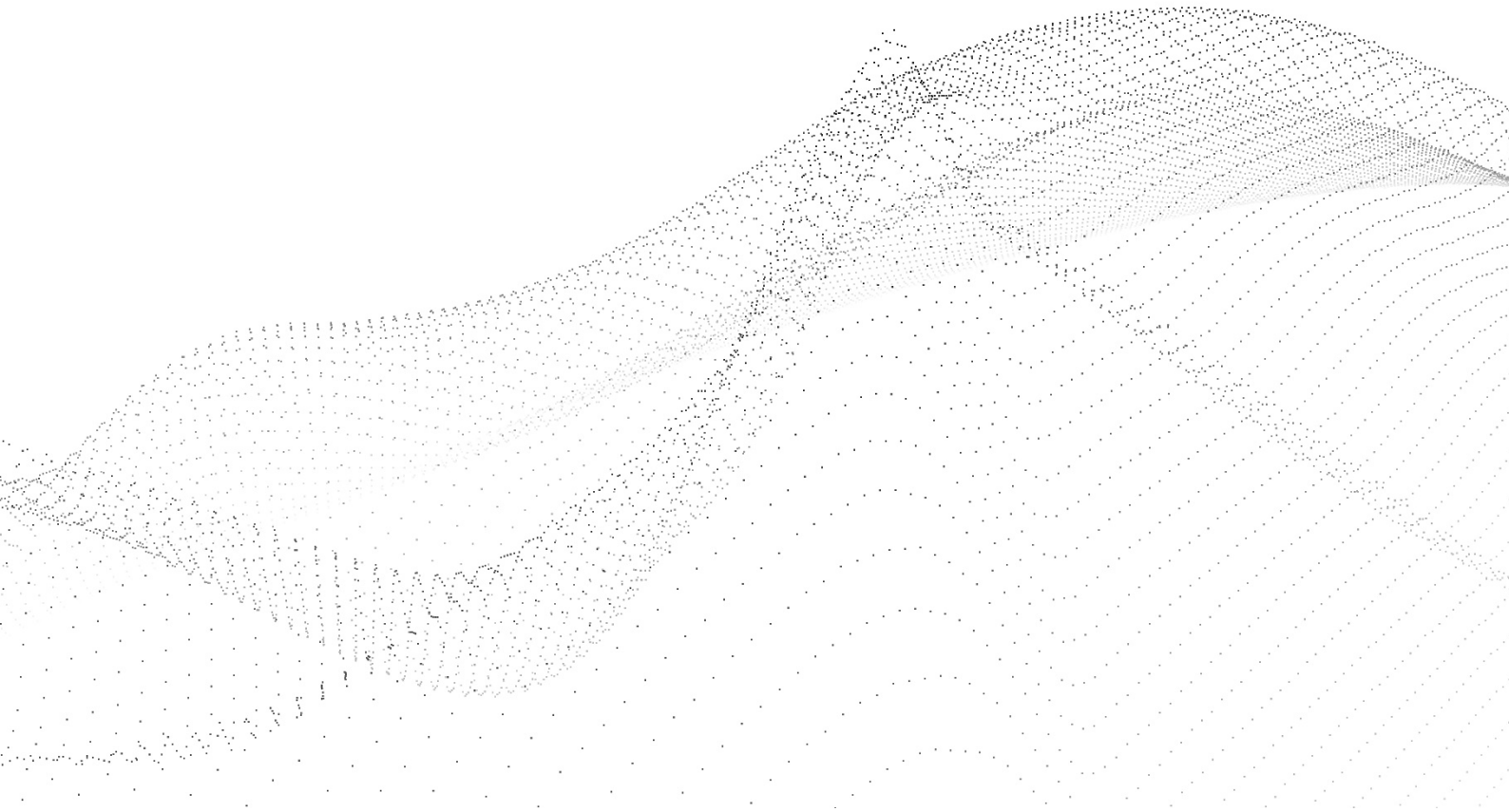

ATSYS

External Privacy Policy

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Delivering Excellence in Operational Technology for Critical Infrastructure

ATSYS Pty Ltd

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1 Privacy Policy

1.1 Introduction

This Privacy Policy (**Policy**) explains how ATSYS Pty Ltd ABN 42 123 208 659 (**ATSYS, the Company, we**, or **us**) handle your personal information. We are committed to complying with the Australian Privacy Principles (**APPs**) in the *Privacy Act 1988* (Cth), and to being open and transparent about our personal information handling practices. We respect the confidentiality of your personal information and ensure that the appropriate steps are taken to safeguard that information.

This Policy sets out:

- how and why we collect, store, use and disclose your personal information;
- how you can access and update your personal information held by us; and
- how you can make a complaint if you have any concerns about how we have handled your personal information.

1.2 The types of personal information we collect and hold (and why)

To provide our services and effectively run our business, we may collect the following personal information from you:

- name and contact details (including address and email).
- occupation.
- our suppliers' and contractors' names and contact details; and
- personal information provided to us in applications for employment with us (including candidate and referee details).
- audio, video, shared content and transcript content, where you take part in a meeting, call or webinar with us that is recorded or transcribed.

We may also collect your contact details and email address for marketing purposes, in accordance with privacy and/or spam legislation.

We do not generally collect sensitive information (as defined in section 6(1) of the Privacy Act 1988 (Cth)). Where we need to collect sensitive information (for example, as part of recruitment or where required by law), we will only do so with your consent or where the collection is otherwise permitted under the Privacy Act.

We may also collect the personal information of third-party individuals whose data our Clients have engaged us to process under a contract. Where we do this, we will only process the personal information in accordance with our Clients' instructions.

1.3 How we collect personal information

Where it is practicable to do so, we aim to collect personal information about you directly from you. We may also collect personal information about other individuals indirectly because it is collected in a communication with us. Some examples of how we collect personal information include (but are not limited to):

- directly from individuals during telephone calls and/or emails.
- directly from individuals who register with us for copies of our materials and/or to attend our events, including webinars.
- directly from individuals who sign up to receive information about us via the Contact Us form on our website.
- directly from individuals, or via our Clients, where we are contracted to process personal information on our Client's behalf; and
- via our official social media pages.

Meetings, calls and webinars conducted using our online meeting platform may be recorded or transcribed, and notes or summaries may be generated with AI assistance. Where this occurs, you will be notified and, depending on the device or service you join from, asked to agree before your audio, video and shared content are included. If you do not agree, you can remain in the meeting on a view-only basis and your audio, video and shared content will not be captured. Recordings, transcripts and generated outputs are held and used in accordance with this Policy and retained in line with our Information Retention Schedule.

1.4 Storage and security of personal information

We take the security of personal information we hold seriously. All personnel handle personal information sensitively and in accordance with the APPs.

We take all reasonable steps to protect the personal information we hold from misuse, interference, and loss, and from unauthorised access, modification, or disclosure. These steps include technical and organisational measures such as access controls, encryption in transit and at rest, multi-factor authentication, logging, vendor due diligence, staff training, and documented incident response procedures.

If we no longer need the personal information, we hold physical copies of, we take reasonable steps to destroy or deidentify that information. It may be necessary for us to retain personal information to comply with our legal obligations, or for insurance or audit purposes. Personal information may be retained for as long as necessary for legal, audit or backup purposes, in line with our Information Retention Schedule.

1.5 How we use personal information and for what purpose

We use the personal information we collect primarily to deliver our services to our clients.

We use personal information of individuals who register (including via our websites) for copies of our materials and/or to attend our events to facilitate their request, and to contact those individuals for marketing purposes.

Where we use your personal information for marketing purposes, you may opt-out of receiving marketing communication from us at any time by clicking the 'unsubscribe' link on a communication.

We may process your personal information where we have been contracted by a Client to do so, in accordance with our contract with that Client and the Client's instructions.

We may also use your personal information for internal training, audit, and quality assessment for the purpose of improving our product and service offering.

1.5.1 Sharing on social media

If you click on a link to a social media site or post from our websites or click on a link to our websites from our social media pages, we may share your personal information (including username, profile picture, likes and posts) with the social media service provider, other users and your friends or followers. If you do not want your personal information shared in this way, you can choose not to connect via your social media profile with our websites or configure your web browser to block cookies (which may affect the functionality of some features).

If you interact with us using your social media account, that personal information will be subject to the privacy policy of the social media site.

1.5.2 To meet our legal obligations

We may also use personal information for the purpose of:

- complying with any applicable laws (for example, any obligations we may have under legislation).
- fulfilling our obligations under contracts with you or third parties.
- where necessary, protecting our rights or the rights of others, including for fraud or risk management purposes; and/or
- complying with requests from government authorities.

1.5.3 Other purposes

We may use your personal information for other reasons, which we will explain when we collect it, or with your consent. We will only use your personal information in accordance with applicable privacy and data protection laws.

1.6 Disclosure of personal information

To conduct our business, we may disclose personal information to third parties. We may disclose your personal information:

- where you agree to the disclosure.
- where the disclosure is for the purpose your personal information was collected, and in circumstances where you would reasonably expect this disclosure to occur; and/or

- where required to do so by law.

We may also disclose personal information in order to comply with legal obligations or where necessary to protect our rights or the rights of others, including for fraud or risk management purposes.

1.6.1 Service providers

We use third-party suppliers to support our business. These Service Providers may provide information technology, hosting, communications, payment processing, marketing or website analytics services.

Our Service Providers may need to access your personal information in connection with providing us with these services. The Service Providers we use may be based in Australia or overseas. We only disclose your personal information to our Service Providers in accordance with this Privacy Policy and applicable privacy laws. We do not authorise their use or disclosure of your personal information for any other purposes other than in connection to the provision of their services to us.

1.6.2 Links to external websites or services

Our electronic messages or online services may contain links to other websites. We are not responsible for the handling of your personal information by those websites and recommend you review the privacy policies of those websites.

1.7 Overseas disclosures

We may disclose personal information to personnel or Service Providers located outside Australia. Before doing so, we take reasonable steps appropriate to the circumstances to ensure the information is handled consistently with the APPs. Where practicable, likely recipient countries are identified in this Policy, an applicable collection notice or other current privacy information. ATSYS does not name a country or provider unless the disclosure has been verified.

1.8 Cookies

Our websites may use cookies or similar technologies that are necessary for website operation or that help us understand website use and improve performance. Depending on the technology used, information may include an IP address, browser or device information, pages visited and interaction data. You can control cookies through your browser settings; restricting cookies may affect website functionality.

If ATSYS uses a website analytics provider, the provider may process usage information on ATSYS's behalf. ATSYS will keep its website notice or cookie settings current with the analytics service in use and make any available preference or opt-out controls accessible there.

1.9 Use of automated systems

ATSYS does not currently use automated systems (including artificial intelligence or rules-based programs) to make decisions, or to substantially assist in making decisions, about you. From 10 December 2026, the Privacy Act 1988 (Cth) will require organisations that use automated decision-

making in this way to disclose specific details about it in their privacy policies. If we begin to use such systems, we will update this Policy accordingly.

1.10 Data breaches

If we become aware of an eligible data breach that is likely to result in serious harm to any individual, we will notify the Office of the Australian Information Commissioner and affected individuals as required under Part IIIC of the Privacy Act 1988 (Cth) (the Notifiable Data Breaches scheme).

1.11 How to access, update or correct your personal information

You can request to update or correct personal information we hold about you which you believe is inaccurate or out of date by contacting us at the address under Contact Details. We may need to verify your identity before actioning your request.

1.12 How to make a privacy complaint

We handle your personal information in accordance with this Policy and the APPs. However, if you have any concerns about the use of your personal information you can contact us using the address at Contact Details so that we can try and resolve the issue with you quickly and directly.

If we are unable to resolve your complaint to your satisfaction, you can contact the Office of the Australian Information Commissioner at:

GPO Box 5218

Sydney NSW 2001

www.oaic.gov.au

You may also have a separate right to commence court proceedings under the statutory tort for serious invasions of privacy (Schedule 2 of the Privacy and Other Legislation Amendment Act 2024 (Cth)), which came into force on 10 June 2025. This is independent of any complaint made to us or to the OAIC.

1.13 Contact details

To request access to the personal information we hold about you, or to make a privacy complaint, contact us at:

Email: privacy@atsys.com.au

Telephone: +61 8 7099 3000

Address: Level 6, 95 Grenfell Street, Adelaide SA 5000

1.14 Defined Terms

Client means a client or customer that we are engaged to provide services to under a contract.

Personal information has the meaning given to that term in the *Privacy Act 1988* (Cth).

Service Provider means a third party we engage to provide us with services to support our business.

Website means www.atsys.com.au and any other websites operated and/or managed by us.

We or **us** or **Company** or **ATSYS** means ATSYS Pty Ltd, ABN: 42 123 208 659.