

# **External Privacy Policy**

# 1. Privacy Policy

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.

# 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).

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

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.





# 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.

# 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 using appropriate electronic and physical security measures.

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 stored electronically may be stored securely indefinitely for IT back up and electronic audit trail purposes.

# 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.

# 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.

#### 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.

### 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.





Issue Date: 08/03/2024

# 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.

#### 6.1 Service Providers

We use third party suppliers to provide us with services to support our business. These Service Providers may perform services on our behalf or assist us to provide services to you. For example, we engage Service Providers to provide us with IT services, advertising, payment processing, marketing, and marketing analytics services (including Google Analytics).

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.

### 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.





### 7. Overseas disclosures

We may disclose personal information to personnel and/or Service Providers located overseas. Where we do so, we take steps to ensure that the personnel, or any third parties, involved in the handling of personal information comply with the APPs and with this Privacy Policy.

#### 8. Cookies

Our websites use cookies to analyse website traffic and help us provide a better website visitor experience. A cookie is a text file containing small amounts of information which is downloaded to your device when you access a website. This information may include your IP address, information and actions taken on the site including details about when you accessed the site. The text file is then sent back to our server each time your browser requests a page from the server. Information generated by cookies about the use of our websites may be transferred to, and stored by, a web analytics service Google Analytics, which may be based overseas. You can configure your browser to reject cookies, but this may affect the functionality of the websites.

We use website analytics service providers, including Google Analytics, that use cookies to analyse traffic to our websites. These analytics service providers collect information and statistics about the website, including by counting the number of visitors and tracking how visitors use the website. This type of analysis helps us make our websites more effective to use, for example by improving how easy it is for visitors to find what they are looking for on the websites or fixing any issues users have with the websites. Information supplied by analysis cookies helps us to understand how our visitors use our websites in order to improve the user experience.

### 9. How to update, correct, or request deletion of, or access to 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.

# 10. 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.





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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

# 11. Currency

This Privacy Policy was last updated in March 2024.

#### 12. 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 1, 5-7 King William Road, Unley SA 5061

### 13. 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.

