S-Tech Holdings Pty Ltd ABN 25 162 575 804

Privacy Policy &

**Collection Statement** 

# S-Tech Holdings Pty Ltd

## PRIVACY POLICY

#### Introduction

This is the privacy policy of S-Tech Holdings Pty Ltd (ABN 25 162 575 804) ('S-Tech', 'we', 'our', or 'us' as the context may require). The purpose of this policy is to clearly state how S-Tech intends to meet its obligations under the Australian Privacy Principles ('APPs') set out in the *Privacy Act 1988* (Cth) ('Privacy Act') in relation to the personal data it collects from all its customers from around the world, and other related laws where applicable.

Our Privacy Policy details the sort of information S-Tech may collect about you, how S-Tech manages, uses and discloses your personal information, sets out some of your privacy rights in relation to personal information and advises how you can contact us with privacy queries.

S-Tech recognises the trust you place in our company through your dealings with us across our various platforms and brands, and we do everything we can to maintain that trust, and we will only use your personal information in a manner consistent with this policy.

By accessing, browsing or using any website owned and/or operated by S-Tech (each a '**Site**') or otherwise providing your information to us, you acknowledge that you have read, understood and agree to be bound by this Privacy Policy. Since this Privacy Policy is subject to change without prior notice, you should check back on this Privacy Policy regularly. All changes are effective from the date we post the revised Privacy Policy. In particular, by continuing to use the Site(s) after the Privacy Policy has been varied or by otherwise providing your information to us, you agree to be bound by the variation.

### Collection of Personal Information

We collect personal information from you in a variety of ways, being when you knowingly provide it to us, such as through our Site(s), via email correspondence, when you enter competitions, when you purchase goods or services, when you subscribe to mailing lists or other services, or otherwise as allowable under law. We aim only to collect personal information that is necessary to carry on our business and to supply you with the goods and/or services that you have contracted or requested us to provide. However, we may also collect information about you to do internal research and to conduct market research for our own purposes.

We may collect the following personal information:

- your name and contact details, such as your telephone or mobile phone number, email, social media handles, or postal address; and
- other information that you provide to us, workplace/place of business, date of birth, title or gender.

While we endeavour to only collect personal information from you directly, we may also collect information from the following sources that you may be unaware of including:

- third parties (such as agencies on our behalf or our commercial partners);
- public directories and listings;
- personal interactions with S-Tech employees; and
- electronic information from email or the Internet.

Before collecting information of a sensitive nature or information relating to an individual's health, we will seek consent from the individuals concerned. For instance, we may collect information regarding your racial or ethnic origin, political opinions or associations, religious or philosophical beliefs, trade union membership or associations, sexual orientation or practices, criminal record, health or genetic information or some aspects of your biometric information, with your consent.

We may collect your credit card or banking details in order to procure payment for goods or services you request, however such financial information will be treated in a different manner to the rest of your personal information, as detailed below.

### Use and Disclosure of Information

S-Tech will generally only use and disclose your personal information if the disclosure is necessary to answer your enquiry or request, to supply you with goods and/or services requested, or to complete the services we provide.

When S-Tech collects personal information from you, we will use it for the reasons we collected it and for other reasonable business purposes, which may include:

- to database, store and process your personal information to provide you with the goods and/or services you have requested;
- to enable us to improve and develop our products and services;
- to understand your needs, to customise services to meet your needs and preferences, and to provide you with a better service;
- market research;
- to assess suitability for a position at S-Tech;
- development of websites and other value-added services for our customers;
- development of programs or material that may benefit our customers;
- connecting you with third parties that provide goods and services you are likely to be interested in, based on our interactions with you; and
- tailoring communication in order to confer information that is relevant and useful.

We may disclose your personal information to third parties:

- where we have sought your consent or as is otherwise allowed or required by law;
- to our related companies, contractors, suppliers or service providers for the purposes of providing products and services on our behalf and performing our administration and other operations, including accounting and finance checks, IT, marketing, record keeping and statistical purposes, market research, safety purposes, fulfilment services and/or Site traffic analysis;
- to any entity to which we propose to assign any part of our business; or
- or to other organisations with whom we have contractual agreements.

We will only use sensitive information we hold about you for the primary purpose for which it was collected or for a purpose directly related to the primary purpose, and where you would reasonably expect us to use or disclose it for that purpose.

We will never sell or disclose your credit card or financial information to third parties.

If any such third parties collect your information they will have their own obligations regarding treatment of your information, and if you have any concerns about those parties you should liaise with them directly.

If you wish to adjust your marketing preferences, our Sites may provide you with opt-in/opt-out preferences and if so you should use those to tailor your experience to your liking.

#### Cookies

The use of cookies and other information is used on our Sites to optimise the viewing experience, troubleshoot any problems and better serve content. A cookie is a piece of information that our web server may send to your machine when you visit our Sites. The cookie is stored on your machine, but does not identify you or give us any information about your computer, so is not personally identifiable information under Australian law. A cookie helps us to recognise you when you re-visit our Sites and to co-ordinate your access to different pages on the Sites. With most Internet browsers, you can erase cookies from your computer hard drive, block all cookies, or receive a warning before a cookie is stored. If you want to do this, refer to your browser instructions or help screen to learn more.

#### Transfer of Information Outside of Australia

Personal information which we collect and hold is stored within our locally housed data servers in Australia. We utilise some cloud-based service providers for specific functions, such as email and accounts, who may store certain information on our behalf on servers based in United States of America. These service providers are engaged pursuant to terms of service requiring stringent privacy compliance in respect of this data.

Some of the companies we may disclose your personal to are located overseas, including United States of America. In all instances of overseas disclosure, we shall ensure that the transfer of your personal information is carried out in accordance with all applicable privacy and data protection laws.

We will not send your personal information outside of Australia unless:

- It is necessary (including to provide the personal information to a third party) to provide our goods and/or services to you;
- You have provided your consent;
- We believed on reasonable grounds that the organisation involved would only deal with your personal information in a similar manner to the requirements under the APPs; or
- Where otherwise allowed by the Privacy Act.

#### Links to Other Websites

Our Sites may contain links to other websites of interest. However, once you have used these links to leave our Site, you should note that we do not have any control over that other website. Remember, this Privacy Policy is strictly limited to our collection, storage and use of personally identifiable information collected via the Sites or otherwise in the course of our business, and does not apply to any third parties. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such websites and such websites are not governed by this Privacy Policy. You should exercise caution and look at the privacy statement policy applicable to the website in question.

#### Storage and Security

Any information that we no longer use for the purposes contained in this policy is destroyed. The exception to this may be information required for possible data analysis at a future date, or information we are legally required or advised to hold for specific time periods. Wherever practicable subject to the above, the information will be retained in a form that does not allow you to be identified.

The security of your information is important to us. When we have collected information about you it cannot be seen or modified by anyone other than those authorised to access the information for the purposes stated above. We will endeavour to make reasonable efforts to ensure information is stored securely both in electronic and physical forms and to keep this information accurate, up to date, complete and relevant. We ensure only those necessary have access to your personal information. Physical, electronic and managerial procedures have been put in place to reasonably secure any information collected from misuse, interference or loss, and in order to prevent unauthorised access, modification to or disclosure of that information. We utilise systems, services and third party platforms to manage and store your personal information that are located outside of Australia. However, we will never lose effective control of your personal information other than as detailed in this Privacy Policy.

# Your Rights, Access and Correction of Information

You may request details of personal information held about you by S-Tech except where law allows us to refuse your request, in which case we will provide reasons why we have refused. A small access fee may be payable to provide this information. We may provide you with this information verbally or in writing, as may be appropriate. If you would like a copy of the information held on you, please send an email to our Privacy Officer (details can be found at the base of this document).

We will take reasonable steps to amend or correct your personal information to keep it accurate and up to date. If you believe that any information we hold about you is incorrect or incomplete, please write or email us as soon as possible (details can be found at the base of this document). We will promptly correct any information found to be incorrect.

# Privacy Concerns or Complaints

If you have any queries or concerns about your personal information, or would like to make a privacy or personal information related complaint, please contact our Privacy Officer for assistance (see details below). We will treat your complaint confidentially, investigate your complaint and aim to ensure that we contact you and that your complaint is resolved within a reasonable time or the time required by the Privacy Act.

If we are unable to satisfactorily resolve your concerns or complaint, you can contact the Office of the Australian Information Commissioner at <u>www.oaic.gov.au</u>.

## Contact us

You can contact us at the following address:

Privacy Officer S-Tech Holdings Pty Ltd 1 Forum Avenue, Canning Vale, Western Australia, 6155

Ph: 08 9330 8485

Email: support@s-tech.com.au