

Manage Protect Privacy Policy

Manage Protect Pty Ltd ACN 131 201 486 (**Manage Protect, us, we, our**) considers transparency as a core tenant of our culture as an organisation. As part of this transparency, it is important for you to know what we do with the data that we receive from you, and also how we go about securing its privacy. We also seek to comply with our obligations under the *Privacy Act 1988 (Cth)* (**Privacy Act**).

Our Privacy Policy is all about your personal information – the things we know about you. If you are an Australian customer, this Privacy Policy explains how we collect your personal information, what we do with it, who we share it with and, most importantly, how it's protected.

What is personal information?

The data we collect from you and your customers is considered "personal information", which has the meaning set out in the Privacy Act. In general terms, personal information is information (whether fact or opinion) about an individual who is identified or reasonably identifiable.

When we talk about "sensitive information", we mean some types of personal information that are subject to additional protection under the Privacy Act. For example, these can include details about your race, ethnicity, politics, religious or philosophical beliefs, sexual preferences, health, genetics or criminal record.

Why we collect personal information

We collect personal information from you when it is reasonably necessary for a business purpose.

That means we collect personal information to supply you with the products and services you have asked for and to provide you with the best possible service.

Other reasons we collect personal information are to:

- understand you, and how we can meet your needs now and in the future, including by aggregating and processing personal information to generate new insights;
- receive goods or services from third parties;
- enable the proper operation and functionality of our products and services;
- to verify your identity (for example, if you request access to the personal information we hold about you);
- develop or evaluate our products;
- provide marketing materials and make ads more relevant to you, whether they're about our products or those of other companies (see "Advertising" section below);
- manage our business;
- consider you for a job at Manage Protect (whether as an employee or contractor) or other relationships with us;
- communicate with you and to address any issues or complaints that we or you may have regarding our relationship;
- contact you regarding the above, including via electronic messaging such as SMS and email, by mail, by phone or in any other lawful manner; and

- comply with our legal obligations (see "Legal obligations and other privacy exceptions" section).

Technical information and general analytics are used for the purpose of gauging visitor traffic, trends and delivering personalised content to you while you are on our websites, and to improve our websites and our products and services.

We may also use or disclose your personal information for other purposes to which you have consented.

The types of personal information we collect

Manage Protect collects different types of personal information which may include:

- if you are a customer – your name, billing or shipping address, date of birth, gender, occupation, interests, location, contact details (including email address and telephone number(s)), payment details (including credit card information or alternative payment method account information, as this information will be processed by our payment gateway providers), financial information, order details and information about how and where you purchase and use our products;
- if you have requested to receive news about exclusive offers, promotions or events – your name, mailing or street address, email address, and telephone number(s);
- if you have contacted us to make a complaint, provide feedback, submit an enquiry or request a call back – your name, mailing or street address, email address, and telephone number(s);
- if you use our website or apps – technical information and general analytics;
- if you are a prospective employee or contractor – information contained in your application or résumé, recorded during any interview, or obtained through any pre-employment checks, and government-issued identifiers such as tax file numbers; and
- if you are one of our suppliers or service providers – your name, mailing or street address, email address, telephone number(s), number of clients or users, the industry in which you operate and other business details.

Generally speaking, we don't collect, use or keep sensitive information about you. This kind of information will only be collected with your express consent, and we will only use it for the purpose for which you provided it.

There are a few different ways we collect this personal information.

What we collect straight from you

We collect most personal information directly from you, including during our relationship with you. For example, when you might:

- fill out a form online or in a store, or provide information to one of our representatives on the phone;
- access or use our websites or apps;
- order, purchase or use our products or services (including our technical support channels);
- pay your bill for our products or services;
- sign up to receive news and exclusive offers, promotions and events;

- make inquiries about us or our products or services or otherwise communicate with us by email, by telephone, in person, via a website or otherwise; and
- apply to work with us or are engaged by us as a contractor.

Of course, you can choose not to provide your personal information or may just want to deal with us anonymously. If this happens, we may not be able to provide you with the information, product or service you've asked for or give you the level of service you expect. For example, we will not be able to send you information you have requested if you have not provided us with a valid email address or telephone number.

What we collect from your online activity

The Manage Protect websites and apps also use cookies and other digital identifiers to collect technical information and general analytics. These include:

- Site performance identifiers: these give us information about how our websites or apps are used. This helps us provide you with a more user-friendly experience.
- Analytics cookies: we use these to gather statistics about our site and apps. For example, they help us monitor how many users are on the site or app, and what sections are most popular.
- Advertising cookies: we use these cookies to improve our understanding of the kind of advertising that may be relevant to your aggregated segment.

When we talk about "cookies", we mean data files that are placed on your device and often include an anonymous unique identifier. It's important to know you can clear cookies or digital identifiers from your device and also disable future use of them by changing the security settings on your web browser. However, doing this might mean that parts of our websites and apps may not work as they should. For more information about cookies, and how to disable cookies, visit www.allaboutcookies.org.

By using our websites and apps, you are consenting to the use of these technologies in accordance with this Privacy Policy.

What we collect from others

Where it is reasonable and practicable to do so, we will only collect personal information about you from you directly and not from third parties. In limited circumstances, other people might give us personal information about you. For example, we might be given personal information by other members of your organisation or by your customers to assist with on-boarding.

We will take reasonable steps to make sure you know we have your personal information, how we got it and how we'll handle it.

Who do we share your personal information with?

We will only disclose personal information to others if you've given us permission, or if the disclosure relates to the main reason we collected the information and you'd reasonably expect us to do so (see the "Why we collect personal information" section). This may include disclosing your personal information to the following types of third parties:

- our related companies;
- any potential third party acquirer of our business or assets, and advisors to that third party;
- our professional advisers (such as lawyers, accountants or auditors) and insurers;
- our employees, contractors and third party service providers who assist us in performing our functions and activities (e.g. payment system operators and financial institutions, cloud service providers, data storage providers, telecommunications providers and IT support service providers);
- credit-reporting and fraud checking agencies, and credit providers (see "Outstanding payments" and "Credit related information" sections);
- organisations authorised by us to conduct promotional, research or marketing activities;
- third parties to whom you have authorised us to disclose your information (e.g. referees); and
- any other person as required or permitted by law.

If we disclose your personal information to third parties we will take reasonable commercial steps to ensure that they only use your personal information as reasonably required for the purpose of disclosure and in a manner consistent with applicable laws.

We sometimes team up with other companies to offer products. If you purchase a product that is delivered by one of our partners, we'll give them the personal information they need to provide it and manage their relationship with you. In these circumstances, we will use commercially reasonable endeavours to put arrangements in place with our partners that limit their use or disclosure of your personal information to these purposes.

We work with third parties to provide some types of software development, media communications, and marketing communications. They may have access to systems that include your personal information. We will use commercially reasonable endeavours to ensure that these companies are subject to strict controls that protect your information from unauthorised use or disclosure, and to limit their access to your personal information to the extent necessary to do their job.

Access to personal information from overseas

Your personal information is stored within our Customer Relationship Management systems (**CRM**), [salesforce.com](https://www.salesforce.com) and www.hubspot.com. Both Salesforce and HubSpot provide their CRM services to us from servers in Singapore, New Zealand and the USA.

Your and your customers' information are stored as follows:

- MPmail (*emails*): all within Australia.
- MParchive (*email archive*): stored in Australia and New Zealand.
- MPweb (*web filtering*): all within Australia.
- MPsoonr (*fileshare*): all within Australia.
- MPexchange (*managed exchange*): all within Australia.
- MPaudit (*auditing*): all within Australia.
- MPaware (*cybersecurity*): USA.

Except where an exception applies under the Privacy Act or other relevant legislation, we will take commercially reasonable steps to ensure that overseas recipients to whom we disclose personal

information do not breach the Australian Privacy Principles stated in the Privacy Act in relation to such information.

Outstanding payments

In some circumstances, we may need to refer or sell overdue debts to debt collectors or other companies. If we do this, we'll give them secure access to the personal information they need to handle the debt.

We may also update credit reporting agencies about some types of payment defaults, although we'll always tell you before we do this.

Legal obligations and other privacy exceptions

We give access to personal information where we are permitted or obliged to do so by Australian law. For example, in some circumstances we will use or disclose personal information to react to unlawful activity, serious misconduct, or to reduce or prevent a serious threat to life, health or safety. We are obliged to cooperate with law enforcement bodies in some circumstances. We may disclose personal information, including information about emails and service use, when we receive an access request or warrant that is authorised under Australian law.

Advertising

We will occasionally communicate with you about our products in the form of our newsletter and promotional emails. We'll make sure that any marketing emails, texts and letters we send you clearly tell you how to opt out, or you can contact us (see "Getting in touch" section below).

You can opt out of receiving advertising material sent by us to you at any time by clicking on the opt out symbol displayed at the bottom of the online ad or by calling us on 1300 657 500.

When you opt out, you can choose to opt out of particular direct marketing, or all direct marketing. Of course, there are some types of marketing that you can't opt out of on an individual basis, like online ads that are not targeted specifically to you.

Credit related information

Manage Protect uses personal information to assess your credit situation when you apply for our services or to become a partner.

After you become a customer, we store the crucial bits of information from the credit report and our own credit assessment. We may continue to use this information to manage credit, and to make sure we're offering and providing the right services to you.

Manage Protect doesn't use credit related information to generate marketing lists.

You can get access to credit related information we hold about you, ask us to correct it, or make a complaint, as described below in this Privacy Policy. If we agree that our records need to be corrected, and we've previously disclosed that information to a credit reporting agency or other person, we'll tell them about the correction too.

You can ask the credit reporting agencies not to use or disclose the information in their files if you think you have been or are likely to become a victim of fraud.

You can find out more about the credit reporting agencies Manage Protect works with at www.veda.com.au and www.dnb.com.au. These websites give the credit reporting agencies' contact details and policies about the management of your personal information.

Security

We're committed to protecting your personal information and will take commercially reasonable steps to protect it from misuse, loss or unauthorised access, modification or disclosure.

Some of the security measures we use include:

- firewalls and access logging tools that protect against unauthorised access to your data and our network;
- secure work environments and workflow systems that prevent unauthorised access and copying of your personal information;
- secure server and closed network environments;
- encryption of data in transit;
- virus scanning tools;
- management of access privileges, to ensure that only those who really need it can see your personal information; and
- ongoing training and security reviews.

These measures are robust, but security risks do change. We will remain vigilant in our efforts to protect your personal information.

However, as the Internet is inherently insecure, we cannot guarantee the security of transmission of personal information you disclose to us online. Accordingly, you transmit your personal information to us online at your own risk.

Please notify us immediately if you become aware of any breach of security.

How long do we keep your personal information?

Generally, we will retain your personal information for the period necessary for the purposes for which your personal information was collected (as outlined in this Privacy Policy) unless a longer retention period is required by law or if it is reasonably necessary for us to comply with our legal obligations, resolve a dispute or maintain security.

How to access your personal information

If you ask us, we will usually give you access to the personal information we hold about you. We will always confirm your identity before giving access to your personal information.

You can ask for access by calling us on 1300 657 500.

There are circumstances under the Privacy Act where we may not give you access to the personal information we hold about you. For example, we can't give you access if it would unreasonably affect someone else's privacy or if giving you access poses a serious threat to someone's life, health or safety.

There is generally no cost for accessing the personal information we hold about you, unless the request is complex or resource intensive. If there is a charge, it will be reasonable and we will let you know what it is going to be so that you can agree to it before we go ahead.

Quality of personal information

We aim to keep the personal information we hold about you accurate, up-to-date and complete. If you think our records need to be corrected, please call us on 1300 657 500.

How to complain about a breach of privacy

If you have any questions, concerns or complaints about our collection, use, disclosure or management of your personal information, please contact us in writing using the contact details below.

We will make inquiries and your complaint will be assessed by an appropriate person with the aim of resolving any issue in a timely and efficient manner.

If you are unsatisfied with the outcome, we will advise you about further options including, if appropriate, review by the Privacy Commissioner within the Office of the Australian Information Commissioner.

Getting in touch

We recognise that your personal information is important to you, so please let us know if you have any questions or concerns about this policy or our practices.

You can get in touch with us by:

Phone: 1300 657 500 or info@manageprotect.com

Last updated: 4 September 2023