

1 Introduction

- (a) This Privacy Policy describes the personal information that we envisage may be collected by Australis M2M, and the way we conduct our business in compliance with laws on privacy and data. We hope this Privacy Policy will help you understand what personal information Australis M2M collects, how it is used and with whom it might be shared.
- (b) If you have any questions not addressed in this policy, please feel free to contact us.
- (c) The term Australis M2M or Australis M2M Pty Ltd, or "Us" or "We" or "Our" refers to:
Australis M2M Pty Ltd
ABN: 43 626 409 489
- (d) The term "You" or "Your" refers to any Customer, Website, Service or Product user of Australis M2M.

2 What Information does Australis M2M Collect?

- (a) In the course of its business activities and providing Products and Services, Australis M2M will need to process personal data. "Personal Data" is any information that can directly or indirectly be used to identify a natural person. You, or your authorised representatives provide most of your Personal Data directly to Australis M2M, for example:
 - i) Contact information, such as your name, address, e-mail address and phone number;
 - ii) Financial information, such as your bank account number, payment status, invoices;
 - iii) Identification information, such as your driver's licence number;
 - iv) Account information, such as log-in details, for services provided by Australis M2M or our Suppliers
 - v) Mobile Network Information, including PIN numbers, user names and passwords
 - vi) Information related to shipment and services, such as shipment tracking number, shipment routing information, location data, status of a shipment, delivery location, packaging type, number of pieces, weight, picture of the parcel and customs information;
 - vii) User and preference information, such as shipping amounts, complaints, history of purchases and related commercial activities, communication, survey information etc.

3 How We Collect Personal Information

- (a) We collect personal information in a number of ways, including:
 - i) directly from you, for example;
 - (1) you fill in an application form;
 - (2) deal with us by email, the telephone or over web chat;
 - (3) purchase a Product or Service;
 - (4) create an account with us;
 - (5) register for, or use, one of our or our suppliers' online services;
 - (6) respond to an online promotion or advertisement
 - (7) provide us with feedback
 - (8) complete an online survey

- ii) from third parties such as our related companies, credit reporting agencies or your representatives, for example;
 - (1) from the organisations identified under "Who has Access to Your Personal Data";
 - (2) from publicly available sources of information;
 - (3) from our own records of how you use Australis M2M or our Suppliers online services and
 - (4) when legally required to do so.
- (b) We will collect personal information from you by lawful and fair means.
- (c) If you choose to not provide your personal information when requested, we may not be able to deliver the product or service that you have requested. We will endeavour to make this as clear as possible for each service.
- (d) Occasionally, you may need to provide personal information about other individuals to us (e.g. about your authorised representatives). If so, we rely on you to inform those individuals that you are providing their personal information to us and to advise them that we can be contacted for further information.

4 Why does Australis M2M Process Personal Data?

- (a) Personal Data shall be collected, used, stored or otherwise processed if necessary within the framework of responsible, efficient and effective operation of Australis M2M's business and legitimate business activities. Specifically, Australis M2M may use Personal Data for the following activities:
 - i) Provision of the products and services ordered. This includes tracking deliveries, communication with individuals and other parties regarding services, responding to requests for (further) information, dispute resolution and preparing agreements.
 - ii) Verification of Customer or Service user identity
 - iii) Product development, research and improvement or rectification.
 - iv) Relationship management and marketing for commercial activities such as informing you of product changes and or new product development.
 - v) Administration and management of Services and Customer accounts, including credit checking, charging, billing and collecting debts;
 - vi) Maintenance and development of our business systems and infrastructure, including testing and upgrading of these systems
 - vii) Compliance with legal obligations. This addresses the processing of Personal Data as necessary for compliance with laws, regulations and sector specific guidelines to which Australis M2M is subject (e.g. matching names of clients, suppliers and business partners against denied parties' lists).

5 Who has access to your Personal Data?

- (a) Australis M2M may share your Personal Data with third parties, including providers of services to Australis M2M in the following circumstances:
 - i) To facilitate the provision of Product or Services and efficient operation of Australis M2M's business. For example, your contact details may be provided to a courier to complete a delivery, or to a services' supplier via their online platform to allow for operation of a Service provided to you, or your information may be stored on a third-party site, such as a CRM, or Accounting System supplier. Purposes for which a third party may have personal data disclosed to and use, in compliance with their privacy policies, include:

- (1) to enable them to fulfil their obligations under their agreements with us;
 - (2) for the efficient provision of a Product or Service to Us for legitimate business operational requirements
 - (3) to contact you as required to fulfil their responsibilities in provision of the Product or Service being supplied;
 - (4) to enable them to manage and administer their internal systems and procedures;
 - (5) to enable them to continue to provide a Service to you following expiry or termination of their agreement(s) with Us;
 - (6) any other requirement as communicated in writing to you;
- (b) These third-party organisations may carry out, on our behalf:
 - i) customer enquiries, and relationship management functions;
 - ii) customer account and/or credit management activities including billing and debt recovery functions
 - iii) mailing operations;
 - iv) information technology services;
 - v) network usage monitoring;
 - vi) market research and marketing activities;
 - vii) Service management functions;
 - viii) support ticketing operations; and
 - ix) web usage and lead generation analysis.
- (c) We take reasonable steps to ensure that these organisations are bound by confidentiality and privacy obligations in relation to the protection of your personal information.
- (d) In addition, we may disclose your information to:
 - i) your authorised representatives or your legal advisers (e.g. when requested by you to do so);
 - ii) credit-reporting and fraud-checking agencies;
 - iii) credit providers (for credit related purposes such as credit-worthiness, credit rating, credit provision and financing);
 - iv) our related companies;
 - v) our professional advisers, including our accountants, auditors and lawyers;
 - vi) other telecommunication and information service providers (for example, if you obtain services from other providers, we may need to disclose your personal information for billing purposes);
 - vii) government and regulatory authorities and other organisations, as required or authorised by law; and
 - viii) organisations who manage our business and corporate strategies, including those involved in a transfer/sale of all or part of our assets or business (including accounts and trade receivables) and those involved in managing our corporate risk and funding functions (e.g. securitisation).
- b) You can request a current list of third parties with which we are currently dealing with and may have supplied Your personal data to.

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6 Use or Disclosure of Personal Information for Direct Marketing

- (a) Australis M2M has a legitimate interest in processing your personal information for promotional purposes, that relate to the Products and Services offered to, or discussed with you.
- (b) Australis M2M may utilise in house or third-party marketing communications services for the purpose of informing you about: our Product and Services, upcoming promotions and events, or other opportunities that may interest you, or as otherwise permitted under applicable privacy laws.
- (c) If you do not want to receive direct marketing communications, you can opt-out at any time by contacting Us or using the opt-out functionality contained in electronic messages received.
- (d) Australis M2M will not disclose personal information to any third party for non-related marketing activities and will not itself use personal information for marketing activities not related to the Products and Services offered to or discussed with you.

7 How Your Personal Data is Stored and Secured

- (a) Personal information is stored in paper-based files and in electronic databases used by Australis M2M and its third-party Suppliers. Due to the nature of our business and the Product and Services we provide to our clients, this data may be held in locations outside the country where you reside and/or where the data was collected.
- (b) Personal information may be collected in paper-based documents and converted to electronic form for use or storage, with the original paper-based documents either archived or securely destroyed.
- (c) Australis M2M will only disclose your personal information outside the jurisdiction it was collected where we are permitted to do so under applicable privacy laws. Generally, this means we will take reasonable steps to ensure your personal information is treated securely and in accordance with applicable privacy law (including the Australian Privacy Act 1988 and the EU General Data Protection Regulation).
- (d) There are other circumstances where we may disclose your personal information to an overseas recipient. For example, you have provided your consent, or we are otherwise permitted to do so under the Australian Privacy Principles or other relevant laws.

8 How Long Will Personal Information be Kept

- (a) Australis M2M will only keep the personal information we collect for as long as is necessary for the purposes set out in this Privacy Policy or as required to comply with any legal obligations to which we are subject. Retention periods considered include:
 - i) legal and regulatory requirements;
 - ii) limitation periods that apply in respect of taking legal action;
 - iii) our ability to defend ourselves against legal claims and complaints;
 - iv) good practice; and
 - v) the operational requirements of our business.
 - vi) regulations applying to the Products and/or Services supplied
 - vii) requirements imposed by third parties such as telecommunications suppliers

- (b) We take steps to destroy or de-identify information that we no longer require or as required by an applicable law.

9 What rights can you exercise in relation to your Personal Data?

- (a) Based on the law applicable to the use of your Personal Data, you may be able to exercise a number of rights in relation to your Personal Data. Note that in many cases, your rights are not absolute, and we may not be required to comply with your request. Examples of such rights:
 - i) Right of access. You are entitled to a copy of the Personal Data we hold about you and to learn details about how we use it.
 - ii) Right to rectification. If you believe the information we hold is not accurate, you can ask us to update or amend it.
 - iii) Right to erasure. In certain circumstances, you have the right to ask us to erase your Personal Data. However, this will need to be balanced against other factors. For example, we may not be able to comply with your request due to certain legal or regulatory obligations.
 - iv) Right to restriction of processing. In certain circumstances, you are entitled to ask us to (temporarily) stop using your Personal Data.
 - v) Right to data portability. In certain limited circumstances, you may have the right to ask that we transfer Personal Data that you have provided to us to a third party of your choice.
 - vi) Right to object. You have the right to object to processing which is based on our legitimate interests. Unless we have a compelling legitimate ground for the processing, we will no longer process the Personal Data on that basis when you file an objection. Note however, that we may not be able to provide certain services or benefits if we are unable to process the necessary Personal Data for that purpose.
 - vii) Rights relating to automated decision-making. You have the right not to be subjected to automated decision-making, including profiling, which produces legal effect for you or has a similar significant effect. If you have been subject to an automated decision and do not agree with the outcome, you can contact us using the details below and ask us to review the decision.
 - viii) Right to withdraw consent. We may ask for your consent to process your Personal Data in specific cases. When we do this, you have the right to withdraw your consent at any time.

10 Resolving Complaints and Contacting Us

- (a) You are entitled to complain if you believe your privacy has been compromised by Australis M2. You can contact us as below. If you believe your complaint has not been satisfactorily dealt with you may apply to the Office of the Australian Information Commissioner (OIAC) or the relevant supervisory authority in the jurisdiction that is applicable.
- (b) If you need to contact us for any reason you can do so at:
Australis M2M Pty Ltd
email: info@australism2m.com.au