



## Privacy Policy

### Privacy and Security Policy

Cirrus Networks Holdings Ltd (ACN 103 348 947) and all our related entities (collectively, Cirrus, us, we, our) have obligations to protect the privacy of your personal information in accordance with the Privacy Act 1988 (Cth), including the Australian Privacy Principles (APPs), and we seek to apply those principles in our dealings with personal information.

This policy is intended to provide a general overview of our approach to handling your personal information. Other policies may apply instead of or in addition to this policy in certain circumstances.

By using our website at [Cirrus Website \(Website\)](#) and/or providing your personal information to us, you consent to us handling your personal information in accordance with this policy.

Please keep in mind that, if you directly disclose personally identifiable information or personally sensitive data through Cirrus public discussion groups, including blogs, this information may be collected and used by others.

Cirrus encourages you to review the privacy statements of websites you choose to link to from our Website so that you can understand how those other websites collect, use and share your information. Cirrus is not responsible for the privacy statements or other content on websites other than our Website.

### Collection of your Personal and other Information

We collect personal information about you in the course of your dealings with us (for example, if you submit an online enquiry or purchase products and services from us).

The type of personal information we collect will depend on your dealings with us. Generally, we will collect your name, address, contact details (including telephone number, fax number and email address), business details (ABN, business name and your position within the company - if applicable), payment details and information about your use of the products and services that we supply.

Depending on your financial arrangements with us, we may also collect credit information about you in accordance with our credit policy.

We may also collect other personal and sensitive information from you (for example, if you are applying for a position with Cirrus then the personal information we collect may include your resume, qualifications, skills, education providers and history, work history and residency status).

We may also collect some types of information relating to you that is not your personal information as defined by the legislation, such as:

- anonymous demographic information, which is not unique to you, such as your post code, age, gender, preferences, interests and favourites; and/or
- information about your computer hardware and software. This information can include: your IP address, browser type, domain names, access times and referring website addresses. We use this information for the operation of and to maintain the quality of our service, and to provide general statistics regarding use of the Website.

Generally, we aim only to collect information that is necessary for our business functions. We also generally collect your personal information directly from you. However, sometimes it might be impracticable or unreasonable to collect information directly from you. Also, from time to time we might collect personal information about you from third parties (for example, our agents or contractors) as well as publicly available resources.

If we are unable to collect the personal information we require, or the information provided is incorrect or incomplete, this may affect our ability to provide products or services to you.



## **Purposes for which personal information is Collected, held, used and disclosed**

We generally use and disclose your personal information for the purposes for which we collected it, and for other related purposes that you would reasonably expect.

Generally, these purposes include responding to your enquiries, providing you with products and services, handling payments and refunds, providing you with marketing information or special offers for our products and services, obtaining your feedback on your customer experience, conducting marketing and other promotional activities and for our general business operations (for example, maintenance of our business records, compliance with our legal and insurance obligations and statistical purposes).

By providing us with your personal information, you consent to us using that information for the purposes set out above. You also agree that we may send you marketing and promotional information by post or by electronic means (including e-mail and SMS). You can opt out of those communications at any time using an opt-out mechanism in one of our communications, or by contacting Cirrus using the details below.

We do not sell, rent or lease our customer lists to third parties. We may exchange your personal information within the Cirrus corporate group, and may disclose your personal information to our licensees, agents, contractors and/or promotion partners for the purposes set out above. All such third parties are required to maintain the confidentiality of your information.

If we are considering selling our business, or any part of our operations or assets then, we may disclose personal information to a purchaser (or potential purchaser) in connection with that process or sale.

Apart from the above examples, we may also use and disclose your personal information with your consent and as otherwise required or permitted by law.

## **Sensitive information**

Generally, we will only collect 'sensitive information' with your consent.

Sensitive information is, but not limited to, information or an opinion about an individual's:

- racial or ethnic origin;
- membership of a professional or trade association;
- membership of a trade union;
- criminal record.

We will assume that you have consented to us collecting all information which is provided to us by you for use in accordance with this policy, including any 'sensitive information', unless you tell us otherwise at the time you provide it to us.

## **Information about third parties**

If you provide us with personal information about a third party, in doing so you will be representing to us that you have that person's consent for us to collect and handle their personal information in accordance with this privacy policy – and we will be collecting the information on that basis.

## **Storage and security of your personal information**

We may hold your personal information in electronic formats or in hard copy. Generally, we aim to store your personal information securely to ensure it is protected from unauthorised access, modification and disclosure, and from other types of misuse, interference and loss.



Generally, we will take reasonable steps to destroy or permanently de-identify your personal information if we no longer require it for any purpose for which it can lawfully be used or disclosed. We may retain your personal information for as long as necessary to comply with any applicable law, for insurance and corporate governance purposes, for the prevention of fraud and to resolve disputes. Your personal information may also be retained in our IT system back-up records.

We use encryption, such as Certificate based Secure Socket Layer & Transport Layer protocols, when transmitting personal information to other websites. However, the transfer of data over the internet is inherently insecure. We cannot guarantee the security, during transmission, of any personal information provided to us via any website (including our Website). Please bear this in mind when transmitting information by this means to us.

### **Access and correction of your personal information**

You may lodge a request to correct personal information that we hold about you if you believe it is inaccurate, incomplete, out-of-date, irrelevant or misleading, in which case please contact our Privacy Officer (see the contact details below).

You may also request that we provide you with access to the personal information we hold about you. Generally, we will provide you with access, except in limited circumstances where the law permits us to deny access. Any such request must be made in writing to Cirrus using the details shown below. We will not charge you a fee for requesting access, but if your request for access is accepted, we will inform you in advance of any fee that you will need to pay us for providing access.

### **Cirrus website**

Our Website uses 'cookies', which are text files placed on your hard disk by our web page server. The cookies cannot be used to run programs or deliver viruses to your computer. We also do not use the information stored in those cookies to collect information about you or your computer. The cookies are used for statistical purposes and to assist with your use of the Website. We may also collect click-stream data when you use the Website, such as the date and time of your visit, the pages you accessed, your IP address, the type of browser and operating system you are using and the websites you come from and move to. This information is collected for statistical purposes to assist us to find out how our Website is used and navigated and to improve our Website.

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Cirrus services or websites you visit.

Our Website may contain links to third party websites. We are not responsible for the privacy, security or handling of your personal information via those websites. You should review the privacy policy and terms of use for those websites each time you visit them.

### **Overseas Disclosure of your Personal Information**

There may be circumstances in which we will disclose your personal information overseas. The countries to which we are most likely to send your personal information include United States of America, Sri Lanka and New Zealand. By providing us with your personal information, you consent to the overseas disclosure of your personal information and acknowledge that the information may not necessarily be handled in accordance with the APPs.



### **Changes to our Privacy Policy**

We may amend, modify or replace this policy at any time. We recommend that you review our policy each time you visit our Website or provide us with personal information.

### **Complaints**

If you have a complaint about the way we handle your personal information, please contact us using the details below. We will confirm receipt of your complaint and set out the time frame we require to investigate your complaint and provide you with a response. Generally, we expect to be able to respond within 14 days of receiving your complaint.

### **More Information**

If you would like more information about the way we manage your personal information, please contact Cirrus using the following details:

#### **Head Office**

P (08) 6180 4222

E [info@Cirrus](mailto:info@Cirrus)

Level 28, 108 St Georges Terrace, PERTH 6000