# Privacy Policy

CloudtechiT Pty Ltd (ABN 54643416666) and its related bodies corporate ("we", "our", "us") recognise the importance of protecting the privacy rights of the individual ("you" or "your") in relation to their personal information. This document is our Privacy Policy and explains how we collect, manage, and disclose your personal information. We respect to your rights under the Privacy Act and we comply with all the Privacy Act's requirements in respect of the collection, management, and disclosure of your personal information. For the purposes of the Privacy Policy, a reference to 'including' or 'for example' means including or for example without limitation.

#### Section 1 – Your information

In this Privacy Policy, personal information and sensitive information have the meaning defined in the Privacy Act. In general terms:

- personal information is any information that can be used to personally identify you. This may include your name, address, telephone number, email address and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.
- sensitive information is your health, genetic and biometric information and includes any of your
  personal information about race or ethnicity, political opinions/association, philosophical or religious
  beliefs/association, trade association or union membership, sexual orientation/practices, or criminal
  record.

#### Section 2 – Information we collect

Depending on the nature of your interaction with us, we may collect the following types of personal information:

- name
- mailing or street address
- email address
- telephone number
- facsimile number
- age or birth date
- profession, occupation, or job title
- details of the products and services you have purchased from us or which you have enquired about, together with any additional information necessary to deliver those products and services or to respond to your enquiries
- any additional information relating to you that you provide to us directly through our websites or indirectly through use of our websites or online presence, through our representatives or otherwise
- information you provide to us through our Support team, customer surveys or visits by sales agents representing our business, Cloudtechit Pty Ltd from time to time
- any information that is provided to us by, or that we have collected on behalf of, customers that have outsourced a business process function to us

We may also collect information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users use our websites.

We do not generally collect sensitive information. We may however do so to perform a specific function authorised by a third party organisation (for example, to perform a business process function that has been outsourced to us by a customer) provided that we will only do so if you have given your consent (either to us or to the third party) and it is reasonably necessary for the functions or activities of the collecting party.

Please do not hesitate to ask one of our authorised representatives if you would like to discuss the type of personal information we collect from you and the reason for the collection of such information.

## Section 3 – How we collect personal information

We collect your personal information directly from you unless it is unreasonable or impracticable to do so. We may collect personal information in many ways including:

- through your access and use of our websites
- during conversations between you or your organisation and our representatives
- when you or your organisation submit to us a document containing personal information (for example, emails, contact forms, order forms, credit applications, assets and liabilities statements, proof of identification, direct debit requests, agreements, statements of work, surveys, promotional forms, competition forms etc)

We may also collect personal information from third-parties including:

- from credit reporting agencies
- from law enforcement agencies and other government entities
- from agents, dealers and subcontractors that form part of our sales and/or service network
- from our customers that have outsourced a business process function to us
- from our service providers that collect information on our behalf

#### Section 4 – Cookies

A "cookie" is a small summary file containing a unique ID number which is sent to your internet enabled device, such as your computer. A web beacon is an electronic image which (whether alone or in conjunction with a cookie) is used to compile information about your website usage and your interaction with email. We use the term "cookies" to cover cookies, web beacons and similar technologies generally used in the market.

When you access any of our websites, we or our authorised service providers may use cookies to help provide you with a more enjoyable, relevant, faster and safer experience with us and our websites. Cookies may store information to help us recognise your internet enabled device (for example, the IP address of your device) and may collect information (for example, number of times a page is visited). In some cases, the information used by cookies may be considered personal information if you are reasonably identifiable based on information readily available to us.

A cookie will enable us to greet you each time you visit a website without bothering you with a request to register. A cookie also enables us to keep track of your interest in particular products or services on our websites, which we may use to tailor the relevance of news we send you. We also use cookies to measure traffic patterns, to determine which areas of our websites have been visited and to measure transaction patterns in the aggregate. We use this to research our users' habits so that we can improve our online products and services. We may log the information for analytical purposes, for example, to analyse trends, administer our websites, track user movements and gather broad demographic information.

If you do not wish to receive cookies, you can set your browser so that your internet enabled device does not accept them.

Section 5 – Consequences if we cannot collect personal information

If you do not provide us with the personal information described above, some or all of the following may happen:

- we may not be able to provide the requested products or services to you, either to the same standard or
- we may not be able to provide you with information about products and services that you may want, including information about discounts, sales, or special promotions

• we may be unable to tailor the content of our website to your preferences and your experience of our website may not be as enjoyable or useful

If you would like to know what the consequences would be if you do not provide us with the personal information we request in a particular scenario, please contact our representative that requested the personal information or contact our Privacy Officer via the details specified in Section 13 'How to contact us' below.

#### Section 6 - Purposes for which we collect, hold, use and disclose personal information

We collect personal information about you so that we can perform our business activities and functions and to provide best possible quality of customer service.

We collect, hold, use and disclose your personal information for the following purposes:

- to provide products and services to you and/or your organisation and to send communications requested by you or your organisation
- to answer enquiries and provide information or advice about existing and new products or services
- to provide you with access to protected areas of our websites
- to assess and improve the performance, operation and relevant of our websites
- to perform business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties
- to process and respond to any complaint made by you
- for the marketing (including direct marketing), planning, product or service development, quality control and research purposes of Fuji Xerox Australia Pty Ltd, its related bodies corporate, contractors or service providers
- to update our records and keep your contact details up to date (including updating the records of our contractors)
- if we determine that it is reasonably necessary to:
  - comply with any law, rule, regulation, binding determination, decision or direction of a regulator or in co-operation with any governmental authority of any country, for example, the anti-money laundering legislation
  - o protect any person from death or serious bodily injury
  - o protect our rights

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

## Section 7 – Disclosure of personal information by us

We may disclose your personal information to our related bodies corporate and to various third-party organisations. Except as permitted under the Privacy Act, we will only disclose your personal information for one of the purposes set out in this Privacy Policy.

These third-party organisations include:

- any third-party organisations involved in our sales and support network, for example:
  - o our authorised sales agents
  - o our authorised third-party finance
  - o our authorised service providers and subcontractors (for example, delivery services providers)
- any third-party organisations involved in our business processing functions, for example:
  - o mail houses
  - payment processors
  - o credit reporting bodies
  - o debt collection providers

- any third-party organisations involved in the operation, hosting and management of our information technology infrastructure (including our website), for example:
  - web hosting providers
  - o IT systems administrators
  - o electronic network administrators
- any third-party professional advisors, for example, accountants, solicitors, business advisors and consultants
- any third-party organisations that perform advertising or marketing related services on our behalf, for example, advertising agencies and our authorised agents and dealers
- suppliers and other third parties with whom we have commercial relationships for business related purposes
- any third-party organisation if we determine that it is reasonably necessary to:
  - comply with any law, rule, regulation, binding determination, decision, or direction of a regulator or in co-operation with any governmental authority
  - o protect any person from death or serious bodily injury
  - o protect our rights
- (in addition to the above examples) any other third-party organisation expressly authorised by you

We may combine or share any personal information that we collect from you with personal information collected by any of our related bodies corporate or by any organisations within our authorised sales and support network.

We will not disclose any sensitive information to third parties, except to third-party organisations that have authorised our collection of such information on their behalf, for example, our customers that have outsourced a business process function to us.

#### **Section 8 – Consent**

From time to time we may seek your consent to a particular proposed collection, handling, use and disclosure of your personal information. If we decide to bundle multiple requests for your consent, you may withhold your consent to any or all such requests.

If you have consented to a particular purpose for our use and disclosure of your personal information, then we may rely on your consent until you withdraw your consent or until we become aware of a material change of circumstances. You may withdraw your consent by contacting our representative to whom you originally gave your consent or by contacting our Privacy Officer via the details specified in Section 13 'How to contact us' below.

Your refusal to, or withdrawal of, consent may affect our ability to provide (to the same standard or at all) products, services, or communications to you and/or your organisation subject to the relevant consent.

#### **Section 9 – Direct marketing materials**

We may collect, hold, use and/or disclose your personal information (other than sensitive information) to send you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms, including (without limitation) mail, SMS, fax and email, in accordance with applicable marketing laws.

At any time you may opt—out of receiving marketing communications from us by using the unsubscribe facilities specified in our direct marketing communications or by using the contact details in Section 13 'How to contact us' below. We will then ensure that your details are removed from the relevant marketing contact list you have elected to unsubscribe.

We do not provide your personal information to other organisations for the purposes of direct marketing.

#### Section 10 – Accessing and correcting personal information

With respect to any personal information we hold about you, you may request that we:

- provide you with access to the personal information; and/or
- amend personal information that you believe is inaccurate, outdated, incomplete, irrelevant, or misleading.

We will take all reasonable steps to comply with such requests.

Requests for access or correction should be made by using the contact details specified in Section 14 'How to contact us' below.

To enable us to review and respond to requests in a timely manner, your request should contain the following details (as a minimum):

- your full legal name and contact telephone number
- a description of the personal information you are requesting to access and/or correct
- a date range of when you believe the personal information was supplied to us
- any details of how the personal information was supplied to us originally (for example, when you completed an online competition entry form etc)
- (where correction is required) details of the correction requested

We may contact you for additional information if required (for example, to clarify your request, to confirm your identity etc).

We will generally respond to requests for access or correction within 30 days. Our ability to do so will depend on the scope and clarity of your request, whether the personal information can be readily located and assembled and whether consultation with you or other parties is required. For example, if we hold personal information on behalf of a third-party organisation that has outsourced a business process function to us then we will need to consult with that third-party beforehand.

Where we hold personal information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by email, by phone, in person, or in hard copy).

We will not charge you to make a request for access. We may however charge you for our reasonably incurred costs in complying with your request, including:

- our staff costs for searching, locating, and retrieving the requested personal information and deciding which personal information to provide
- our staff costs for copying and giving access to the personal information
- expenses we have incurred in giving access (for example postage costs)

To the extent practicable, we will advise you in advance prior to charging you in these circumstances and give you an indication of the likely amount.

We will not charge you to make a request for correction. If we are satisfied that the personal information requires correction, we will not charge you for correcting the personal information pursuant to your request.

There may be instances where we may refuse your request for access or correction. For example

• we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality

 we may need to refuse a correction request if we are not satisfied that the personal information requires correction

If we refuse your request, we will give you a written notice setting out:

- the reasons for the refusal (to the extent it is reasonable for us to do so) and
- the steps that can be taken to lodge a complaint in respect of our refusal.

#### Section 11 – Internet security and third-party websites

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification, or disclosure. We may hold your information in either electronic or hardcopy form. Personal information is destroyed or de-identified when no longer needed.

As our websites are linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information communicated online and in particular cannot guarantee that the information will not be intercepted while being transmitted over the internet.

Our websites may contain links to other websites operated by third-parties. We make no representations or warranties in relation to the privacy practices of any third-party website and we are not responsible for the privacy policies or the content of any third-party website. Third party websites are responsible for informing you about their own privacy practices.

#### Section 12 – Complaints about a breach of privacy

If you believe we have failed to comply with the Privacy Act or this Privacy Policy in relation to our handling of your personal information or sensitive information, then you must first lodge your complaint with us using the contact details in Section 14 'How to contact us' below and follow the procedure specified below.

To enable us to review and respond to requests in a timely manner, your request should contain the following details (as a minimum):

- your full legal name and contact telephone number
- a description of the incident (including any relevant dates) so that we can review and/or investigate the complaint
- a description of how you believe we have breached our obligations under the Privacy Act or this Privacy Policy
- We may contact you for additional information if required (for example, to clarify your request, to confirm your identity etc).

Our procedure for investigating and dealing with complaints is as follows:

- Complaints should be made no later than six (6) months from the date the incident occurred. We may consider later applications if there is an acceptable reason for the application not being lodged before.
- If your complaint relates to personal information or sensitive information that we hold on behalf of a third-party organisations (for example, on behalf of a customer that has outsourced a business process function to us) then we may forward your complaint to that third-party organisation for consultation.
- We will treat your complaint confidentially. Our representative will review your complaint and contact you within a reasonable time after receipt of your complaint to discuss your complaint and the options available to you to resolve it.
- We will endeavour to ensure that your complaint is resolved within a reasonable time of receiving your complaint. Please allow up to 30 days before contacting us about your complaint.
- As a final measure, you may take your complaint directly to the Office of the Australian Information Commissioner (for more information, please see <a href="https://www.oaic.gov.au">www.oaic.gov.au</a>).

#### Section 13 – How to contact us

To contact us regarding any request to access or correct personal information, any complaint regarding the treatment of your personal information or sensitive information or if you have any questions regarding this Privacy Policy, then you may contact our Privacy Officer by using use the web form available under the 'Contact Us' page of our website at <a href="www.cloudtechit.com.au">www.cloudtechit.com.au</a>. To ensure your contact is directed to our Privacy Officer in a timely manner, please type 'Privacy Issues' in the message section of "Contact Us" field. Alternatively, you may contact our Officer using any of the methods specified below.

## Post:

Attention: Privacy Officer

Cloudtechit Pty Ltd

PO Box 4173

**ASHMORE QLD 4214** 

Email: complaints@cloudtechit.com.au

Tel: 1300 357 888 (for general enquires only. Please submit correction requests and complaints in writing).

## Section 14 – Changes to our Privacy Policy

We may change this Privacy Policy from time to time, including in order to comply with any future amendments to the Privacy Act or related laws or regulations. Any updated versions of this Privacy Policy will be effective from the date of posting on our website at <a href="https://www.cloudtechit.com.au">www.cloudtechit.com.au</a>.

This Privacy Policy was last updated on 3<sup>rd</sup> September 2020.

### **Section 15 – Customer Retention**

- This service is only provided for the customers in Australia.
- Those who are outside of Australia, we do not provide any services.