



*'Excellence in business data solutions'*

# Privacy Policy

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## Table of Contents

|    |   |   |
|----|---|---|
| 1  | PROTECTING YOUR PRIVACY .....                           | 3 |
| 2  | WHAT IS PERSONAL INFORMATION?.....                      | 3 |
| 3  | YOUR PERSONAL INFORMATION.....                          | 3 |
| 4  | COLLECTING YOUR PERSONAL INFORMATION .....              | 3 |
| 5  | USING YOUR PERSONAL INFORMATION .....                   | 4 |
| 6  | DISCLOSING YOUR PERSONAL INFORMATION .....              | 4 |
| 7  | PROTECTING YOUR PERSONAL INFORMATION .....              | 5 |
| 8  | BIOMETRIC INFORMATION .....                             | 6 |
| 9  | HOLDING ACCURATE INFORMATION .....                      | 6 |
| 10 | ACCESSING YOUR PERSONAL INFORMATION .....               | 6 |
| 11 | CONTACTING US IF YOU HAVE QUESTIONS OR COMPLAINTS ..... | 6 |
| 12 | ACCEPTANCE AND CHANGES TO THIS POLICY.....              | 7 |

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## 1 Protecting your Privacy

At iseek Communications (“iseek”), we are committed to providing you with the highest levels of customer service. This includes the protection of your personal information in accordance with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles.

Set out below is information regarding:

- what personal information we collect;
- how we collect personal information;
- how we use personal information; and
- who we disclose personal information to outside our organisation.

## 2 What is personal information?

Personal information is any information or opinion that identifies, or can be used to identify, an individual.

## 3 Your Personal Information

Personal information held by us may include your name, current and previous addresses, telephone or mobile phone number, email address, banking details, occupation, and your username or password. We also hold details of your iseek services (“the Services”), including their status.

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.

As such, collection of personal information is limited and will generally only occur incidentally to our provision of services to your business or agency, or performance of certain associated functions.

Our customers’ personal information is stored in our Customer Relationship Management (CRM) in the iseek network and data centres which are based in Australia. However, we also store personal information on our accounting system, which is hosted and stored by a third party service provider in the United States of America. Your personal information is accessible to this service provider but only for them to continue to provide services to us.

## 4 Collecting your Personal Information

We collect personal information in a number of ways, including:

- directly from you, for example, when you provide information by phone, email, in application forms, enquiry forms on our website or other agreements;
- when you use the Services;
- when you submit your personal details through our website;
- when you provide your fingerprint and photograph on our Biosecurity system at our data centres;

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- from third parties such as our related companies, credit reporting agencies or your representatives;
  - from publicly available sources of information;
  - from our own records of how you use the Services.

We also collect information in order to comply with our legal obligations (“Legal Requirements”), including obligations under the *Telecommunications (Interception and Access) Amendment (Data Retention) Act 2015* (Cth) and the Copyright Notice Scheme Code 2015, which may include but are not limited to:

- the IP address allocated to you during your use of our internet service;
- the dates and times that you used our internet service including the duration;
- device information;
- how you use our internet service.

## 5 Using your Personal Information

Your personal information may be used to:

- verify your identity;
- provide you with information that you request from us;
- provide you with security access to our data centres;
- assist you to subscribe to the Services;
- provide you with the Services, including support and technical assistance in relation to the Services;
- administration and management of the Services, including charging, billing and collecting debts;
- conduct appropriate checks for credit-worthiness and for fraud;
- conduct research and development to improve the Services;
- maintain and develop our business systems and infrastructure, including testing and upgrading of these systems;
- contacting you in the future in relation to products or services offered by us; and
- comply with Legal Requirements.

## 6 Disclosing your Personal Information

In order to deliver the services you require, we may disclose your personal information to other entities outside our organisation. Your personal information is disclosed to these organisations only in relation to us providing the Services to you, or for suppliers, in relation to the services provided by those suppliers.

These organisations carry out our:

- customer enquiries;
- data centre security;
- billing and debt-recovery functions;
- information technology services; and

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- installation, maintenance and repair services.

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.

In addition, we may disclose your personal information to:

- our third party security services provider;
- your authorised representatives or your legal advisers (e.g. when requested by you to do so);
- credit-reporting and fraud-checking agencies;
- credit providers (for credit related purposes such as credit-worthiness, credit rating, credit provision and financing);
- our dealers;
- our related companies and affiliates for the purpose of providing additional services you request in addition to the Services;
- our professional advisers, including our accountants, auditors, lawyers and insurers;
- 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);
- the Integrated Public Number Database;
- government and regulatory authorities and other organisations, as required or authorised by law;
- copyright content owners pursuant to a court order or a scheme that deals with copyright notifications; and
- 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).

## **7 Protecting your Personal Information**

We take information security very seriously. isek is certified to ISO27001, which is the international standard on information security management systems. All of our data centres have information security controls to protect your information from unauthorised access, destruction, use, modification or disclosure.

For information that is stored on electronic databases, we use secure servers, firewalls, and restrict access by only allowing those personnel that need to know the information, access to that information using passwords.

For information that is not stored electronically, isek's document classification policy ensures that isek's employees and contractors understand that personal information is only to be reproduced strictly where necessary and always stored and treated confidentially.

Online or electronic data transmission (whether it be information that you transmit to us or that we transmit to you using your personal information) is not 100% secure and we cannot

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guarantee the security of online transactions and communications. Therefore, any online activity by you in connection with our website is conducted at your own risk despite our best endeavours to ensure the security of the information that is transmitted between us.

## **8 Biometric information**

For customers, suppliers and visitors of our data centres, iseek uses a state of the art biometric system. This is to ensure the physical security of the data centre and that only authorised personnel are given access. We require each personnel (including contractors and sub-contractors) of our customers and suppliers to provide a fingerprint and a photograph that will be used by us and our third party security services provider for verification purposes whenever visitors attend our data centres. We only store the metadata associated with fingerprints, not the images of fingerprints. We store fingerprint metadata and photographs indefinitely for security reporting and auditing purposes, including customer requests for visitor log reports.

Biometric information is stored in our biometric servers with restricted onsite access to our third party security provider.

## **9 Holding Accurate Information**

We take all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date.

However, the accuracy of that information depends to a large extent on the information you provide. We recommend that you:

- keep us up-to-date with changes to your personal information such as your name or address; and
- advise us if there are any errors in your personal information.

You may request us to correct your personal information by contacting us via the contact details below. We will respond to your request within a reasonable period after receipt.

## **10 Accessing your Personal Information**

You have a right to access your personal information, subject to exceptions allowed by the *Privacy Act*. If you would like to do so, please let us know via the contact details below. You will be required to put your request in writing for security reasons. We will respond to requests for access within a reasonable period after receiving the request.

We reserve the right to charge a fee for searching for and providing access to your information.

## **11 Contacting us if you have questions or complaints**

If you have any questions in relation to your information, or if you wish to make a complaint if you believe your privacy has been breached, please contact the General Counsel on 1300 661 668 between 9.00am and 5.00pm (AEST), Monday to Friday. Alternatively, you can email [privacy@iseek.com.au](mailto:privacy@iseek.com.au) or post your letter to:

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The General Counsel  
iseek Communications Pty Ltd  
PO Box 15087  
City East QLD 4002

We will respond within a reasonable period after receiving a complaint.

## **12 Acceptance and changes to this Policy**

The use of the Services, or your provision of services to isek, indicates your acceptance of this Privacy Policy.

We may vary this policy by publishing an updated version on our website. We encourage you to visit this policy regularly so that you can familiarise yourself with any changes.

Your continued use of the Services, or your continued provision of services, indicates your acceptance of updated versions of this policy.