



Our Commitment to Privacy.

We care about your privacy and this policy details the practices we have adopted to protect your privacy so that you can feel confident about how we handle your personal information. IMTG Australia Pty Ltd (**IMTG** or **we**) respect your rights to privacy under the *Privacy Act 1988* (Cth) (the **Privacy Act**). We are required to comply with the Australian Privacy Principles in the Privacy Act (the **APPs**) in respect of the collection, use, disclosure and handling of personal information from individuals.

This Privacy Policy sets out IMTG's policies on how it manages personal information.

What kind of personal information do we collect and hold?

Personal information is any information or opinion that identifies, or can be used to identify, an individual. IMTG's target markets are the corporate and government sectors and our customers are almost exclusively business entities or government agencies. 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.

The personal information that we collect and hold about you may include:

- your contact details (such as your name, telephone and email address), your position in your organisation and your date of birth;
- opinions that you have communicated to us, particularly where that information may help us to improve the Services and better understand your preferences;
- user names, passwords and certain technical information that you may make available when using our website Services or communicating with us online (as explained further below); and
- other personal information that you may choose to disclose in your interactions with us.

You can always refuse to give IMTG any of the personal information we request, but that may mean that we will not be able to provide you with some or all of the Services, assistance or information you require.

How do we collect personal information?

We generally collect personal information directly from the individual concerned. IMTG collects personal information in a number of different ways, including:

- When you interact with us, including over the phone, in meetings with us, via email and social media channels, and in surveys or requests for information that you answer relating to our business and the Services, or when you place an order for, or apply to receive, our Services;



- When you apply for a job with us, so we can review and assess your application;

Collection via the site:

- In messages sent to IMTG via the Site or our blog, including via the live Online Chat function, our email addresses including info@imtg.com.au and enquiries you submit using the online form at the 'Contact Us' section of the Site. In order to process your enquiry, we may request that you provide certain personal information via an online form, such as name, address and contact numbers. If you send an email instead, we will require the same information; and

From time to time, we may also acquire marketing databases from reputable third party providers, but you will always have an opportunity to opt-out of receiving marketing from us (see below).

What do we do with the information?

Once collected, the personal information is stored in specific databases and in records kept on our premises. We generally only use personal information for the purpose(s) for which we collected it, or for related purposes.

Your personal information may be used to:

- Verify your identity and for us to contact you;
- Assess requests for the provision of Services;
- Provide you with assistance relating to the provision of the Services and answer any requests you may have;
- Administer and manage the Services, including for sales, charging, billing and collecting debts;
- Analyse your use of the Services so that we may improve the Services and our understanding of how you use them and your cloud services needs;
- Conduct appropriate checks for credit-worthiness and security purposes;
- Deliver targeted and non-targeted marketing information to you about the Services and conduct general marketing and promotional activities. When we contact you for the purpose of direct marketing, however, we will give you the express opportunity to decline receiving any further marketing communications from us. You can also contact us as outlined below, to request that we do not send you any further information.

If we wish to use any of your personal information for purposes other than those listed above, or as otherwise permitted by law, we will only do so with your prior consent. Do we disclose your personal information to others?



IMTG does not share, sell, rent or otherwise disclose your personal information except in the following circumstances:

- To other service providers and contractors: In order to provide the Services and perform certain functions in relation to the Services, we may exchange information with other carriers, carriage service providers and contractors. Our standard terms and conditions for the supply of services contain an authorisation from our customers to exchange information in these circumstances;
- To credit providers: We may use and disclose information (including to credit reporting bodies) for credit related purposes such as checking credit-worthiness, credit reporting, fraud checking, collection activity and registration of security interests on the Personal Property Securities Register. Our standard terms and conditions contain an authorisation from our customers to disclose such information for these purposes;
- To government, regulatory authorities, law enforcement agencies and other third parties: Where we are required or allowed by law, regulation or industry codes, or where we think it is reasonably necessary for public health or safety reasons or where we reasonably believe that you are in breach of the terms of use of the Site or are engaging in illegal activities.

Where we share your personal information with our contractors we will take reasonable steps to ensure they use the information only for the purposes of providing the Services or performing the functions required by us, and store the information securely.

IMTG may de-identify your personal information and combine this de-identified information with the de-identified information of others and use this combined information to monitor usage of the Site, market to partners and to improve the Site and IMTG's products and Services. This combined information will not be identified as your personal information.

How do we protect your personal information?

We take all reasonable steps to maintain the security of your personal information that we collect. We use a variety of secure techniques 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, IMTG takes steps to ensure that our employees and contractors understand that personal information is only to be reproduced strictly where necessary and always stored and treated confidentially. IMTG has procedures and controls in place in order to maintain the security and confidentiality of the limited amount of personal information that it stores. Online or electronic data transmission (whether it be information that you transmit to IMTG or that we transmit to you using your personal information) is not 100% secure and IMTG cannot guarantee the security of online transactions and communications. Therefore, any online activity by you in connection with the Site is conducted at your own risk despite our best endeavours to ensure the security of the information that is transmitted between us. Our secure hosting data centres in Australia is accredited with ISO27001. ISO27001 is a standard that focuses on how to assure the integrity, availability and confidentiality of information



assets. Customer content containing personal information that is stored and transmitted via the servers located in our hosting data centres is extremely secure.

COOKIES AND OTHER INFORMATION ABOUT THE SITE.

We collect certain data when you access the Site, however this data is generally not personal information and is not used by us to personally identify you. Such data is collected:

- By the Site's server, relating to your navigation of the Site. The types of information collected may include details of the type of browser you are using, your IP address, the URL you have come from and your domain type and server; and
- From "cookies" used in some sections of the Site. A "cookie" is a small text file that is placed on your computer or other device that enables this Site to customise its services to each individual user. It also tracks your navigation of the Site and stores that information on your hard drive. You should be able to "opt out" of receiving cookies by setting your browser to recognise when a cookie is offered and opting-out of receiving it. More information on cookies and how you can alter your internet web browser's settings can generally be found in the "help" (or similar) section of your computer's browser. Any "cookies" used at the Site are only used only to facilitate use of this Site. IMTG does not use "cookies" to collect and distribute information for any other purpose.

Accessing your personal information and making complaints.

You have the right to request access to personal information that we hold about you, and to request its correction. We will handle requests for access to personal information in accordance with the APPs. To:

- request access to, or correction of, your personal information; or
- make a complaint in relation to privacy, the handling of your personal information or your request to access it,

please contact us by email or post at the addresses set out below.

Requesting access and correction.

You may request that we change any of your personal information in order to update the information. Once we receive your written request, to the extent possible, we will provide you with a copy of that part of your personal information you requested or an accurate summary of your personal information. We will also invite you to request any correction of the personal information and we will confirm with you once we have corrected the personal information. Ordinarily, we will not charge you for the cost of providing this type of access to our



records, and we will generally respond to access requests of this type within 30 days of receiving your request. If responding to your request is going to take longer than 30 days or if there are any fees payable for processing the request (for example where voluminous records are requested or we have to access archived records), we will let you know as soon as possible after your request has been made. We reserve the right to retain information if required to do so by any applicable laws or industry codes.

Complaints.

If you believe we may have breached this policy, or any of the APPs, then you should make a complaint to us in the first instance. You should address your complaint in writing to our Privacy Officer (contact details are set out below), and you should include as much detail as you can about the personal information affected, and the circumstances that you believe amount to a breach of this policy or the APPs.

We will undertake an internal investigation, and we may contact you if we need to obtain any further information in relation to your complaint. We will generally provide a written response to your complaint within 30 days.

If you are unhappy with our response to your complaint, you have the right to make a complaint to the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner can be contacted by telephone on **1300 363 992**. Full contact details for the Office of the Australian Information Commissioner can be found on its website at www.oaic.gov.au.

Contacting us.

If you have any questions about our privacy policy, a request for access to or correction of personal information held by us or any complaint regarding the treatment of your privacy by us, please email us at info@imtg.com.au or write to us at:

Attention: The Privacy Officer (Legal Department)

IMTG Australia Pty Limited

Level 29 Chifley Tower, 2 Chifley Square

Sydney NSW 2000

We may change this privacy policy from time to time and will notify you by posting an updated version of this policy on the Site at IMTG.com.au

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