



CIC Technology Privacy Policy

Our Commitment:

We are committed to protecting your personal information, and ensuring its privacy, accuracy and security.

This Privacy Policy outlines how the Company manages the personal information that we collect, how we use and disclose it, how to seek access to and correct personal information we hold about you, how to contact us and how we manage your personal information.

The Company is bound by the Privacy Act 1988 (Cth) (the Privacy Act) including the Australian Privacy Principles (APPs) in the Privacy Act.

By using any of our products or services, visiting our websites or giving us your personal information, you agree to your information being collected, stored, used and disclosed as set out in this Privacy Policy.

Scope:

This Privacy Policy applies to the collection, storage, use and disclosure of personal information collected by the Company.

Personal Information:

Personal information is defined as:

“information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not, and whether or not recorded in a material form”

Sensitive Information:

Sensitive information, a type of personal information is defined as:

“information or an opinion about an individual’s race or ethnic origins, political opinions and associations, religious beliefs or affiliations, philosophical beliefs, sexual preferences or practices, trade or professional associations and memberships, union membership, criminal record, health or genetic information or biometric information.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent, or where required or authorised by law.

Collecting personal information

We may collect personal information from a range of sources, including directly from you, recruitment agencies, contractors, business partners and government agencies, eg we may collect your personal information when you request or acquire a product or service from us, provide a product or service to us, apply for employment with us or communicate with us via our website.

When we are requesting personal information, we will where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

Collection of other Information

Website

If you visit our website, some of the information we collect about your visit to our website is not personal information because it does not reveal your identity. Information of this nature can include:

- Site visit information – general information about your visit which may include your IP or MAC address, server address, the date and time of your visit, the pages you have accessed, the information you downloaded and the type of internet browser you used. We may use this information in an aggregated anonymous form for statistical purposes only. This will assist us with improving the quality and usability of our website.
- Cookies – small strings of information that a website transfers to your browser for identification purposes. When you browse our website, cookies will be placed on your computer so that we can understand what you are interested in.
- Analytics – from time to time, we use data provided by a trusted third-party analytics platform to help us understand the usage habits of users and members. Our analytics provider does not identify you personally or associate your IP address with any other data held by third party platforms or cloud-based services.

Direct Marketing

From time to time we may use personal information to inform our customers, prospective customers and other persons with whom we interact about our products and services, or about special offers, promotions and events that we think maybe of interest to you.

We may provide this information using any contact phone number or address provided by you. We will generally provide you the opportunity to opt out of receiving marketing communications.

Types of personal information we collect and hold

The types of personal information we collect, and hold will depend on how you engage with us. It may include name, addresses, email addresses, date of birth, phone number, payroll information, credit card details, bank account information and occupation and other information to assist us in conducting our business and providing and marketing our products and services.

Additionally, we may store your information securely including title, name and number plate details in our internal back-end system. This information is not passed to anyone outside our organisation.

Use of Personal Information

We collect personal information:

- Necessary for us to provide you with the products and services you have requested from us
- For marketing purposes and to provide you with information about products and services that maybe of interest to you
- To improve the products and service we provide
- To enable us to conduct our business, including meeting our legal and regulatory obligations.

We use personal information we collect for reasons which may include:

- Communicating and providing you with information, products or services you have requested
- Managing and administering any accounts you have with us
- Researching the needs of our customers and to market our products and services with a better understanding of your needs and the needs of customers generally
- Conducting research for the purposes of improving existing products or services or creating new products or services
- Processing any job application submitted by you
- If you are an employee or other representative of a customer to which we provide our products and services or a supplier or service provider to us, to communicate with you about your or your employer's engagement with us and otherwise as specified in this Policy
- Sharing your personal information with our related entities, business partners and selected third parties as set out in this Policy.

Disclosure of Personal Information

Your Personal Information may be disclosed in a number of circumstances including:

- Third parties – where you consent to the use or disclosure; and
- Where required or authorised by law

Security of Personal Information

Policies and procedures are in place to ensure your personal information is kept secure. Your information will be stored in a manner that reasonably protects it from misuse, loss and from unauthorised access, modification or disclosure, this includes:

- Restricting access to personal information to employees who need to it to perform their role
- Technology products that prevent unauthorised computer access or damage to electronically stored information eg firewalls, passwords and anti-virus software
- Maintaining physical security over paper records.

When your personal information is no longer required for the purpose which it was obtained, the Company will take reasonable steps to destroy or permanently de-identify your personal information.

Disclosing your identity when dealing with us

Where lawful and practicable, we will provide you with the option of interacting with us anonymously or using a pseudonym. However, it maybe impracticable to deal with you or your organisation's personnel on an anonymous basis when providing our products and services.

Accessing your Personal Information

You may request access to the personal information that we are holding about you by contacting the Privacy Officer as outlined below.

Updating your Personal Information

If you become aware that the personal information, we hold is incorrect, incomplete or not current, you may request that we update or correct your information accordingly by contacting the Privacy Officer as outlined below.

Changes to this Privacy Policy

We reserve the right to revise this Privacy Policy or any part of it from time to time.

By continuing to use or access our website, products or services you agree to the updated version of our Privacy Policy. You may also obtain a copy of our latest Privacy Policy by contacting us at the contact details below.

Contact Us

Please contact us if you:

- have a query or concern about this Privacy Policy or our Personal Information handling processes;
- wish to make a complaint in relation to a breach of your privacy;
- would like to access your Personal Information held by us; or
- would like to correct your Personal Information held by us.

CIC Technology Privacy Officer
Via email – trentl@torus-technology.com

Version Control

Version:	Date:	Comments:
1	May 2020	Privacy Policy created
2	July 2021	Policy updated to reflect current business practices