



PRIVACY POLICY

RIOT, through its flexibility and customer partnering, provides security assurance to increase your business' digital maturity.

Version 1.3

RIOT

REVOLUTIONARY THINKING,
EVOLUTIONARY SECURITY.

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Document Control

Author	Role	Contact Details
Suzi Paradzik	Business Support Manager	Phone: 1300 744 028 Email: privacy@RIoTSolutions.com.au

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1. AIM, PURPOSE AND CONSENT

RIoT Solutions Pty Ltd (ABN 73 606 466 102) (**RIoT, we, us or our**) is committed to protecting the privacy of individuals' personal information. This Policy sets out how we manage personal information, in accordance with the *Privacy Act 1988 (Cth)* (**Act**). By accessing or utilising any of our services, you consent to us maintaining, using and disclosing personal information provided to us in the way described in this Policy. We may amend or update this policy. A current and up-to-date copy of this policy is available on our website or on request. It is your responsibility to review and understand our privacy policy as amended from time to time.

2. WHAT IS PERSONAL INFORMATION

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

An exact definition from the Act is as follows:

- *Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not.*

Personal information can include sensitive information. Sensitive information is defined as information or opinion about a person's race, ethnic origin, political opinions, membership of political associations and trade associations, religious or philosophical beliefs, sexual orientation or practices, criminal record, health information, genetic information about an individual that is not otherwise health information, biometric information that is used for the purpose of automated biometric verification or biometric identification and biometric templates.

3. PERSONAL INFORMATION WE COLLECT AND HOLD

We may collect personal information of potential and existing customers, their representatives, and end users.

We may collect the following types of personal information:

- Contact information including names, company, residential, postal, or email address(es), facsimile number(s), and telephone number(s);
- date of birth;
- driver's licence number;
- professional information including employment or business history, qualifications, accreditations and professional licences;
- business references;
- visual information;

- information provided when sending or receiving correspondence with us;
- information provided when accessing any of our services (including account information such as usernames, geolocation data, time stamps, access rights and log sources ingested);
- payment details used to complete payment to us, which may include credit card, debit card or other method of payment details;
- information recorded by our server which is sent by a browser when it connects to our website or services. The information provided may include Internet Protocol (IP) addresses, and browser type, version, and language. We may also collect information about usage (for example, by way of cookies) including when accessing our website or online service, other sites accessed from our website or online services, and content upload and download; and
- any other information which may be provided to us.

4. HOW WE COLLECT PERSONAL INFORMATION

We may collect personal information:

- directly from our potential or existing customers and their representative(s) (such as when we are contacted about our services or an agreement is signed for the provision of our services);
- through our online services and other electronic communication channels;
- from third parties, including our service providers, customer or end user service providers, and persons capable of verifying information we have collected through other means;
- from publicly available sources of information; and
- when we are required to do so by law.

5. HOW WE HOLD PERSONAL INFORMATION

We may store personal information we collect in hard copy or electronic format, in storage facilities that we own and operate ourselves, or that are owned and operated by our service providers. We take reasonable steps to maintain the security of any personal information we hold and to protect it from unauthorised disclosures.

6. HOW WE USE PERSONAL INFORMATION

We may use personal information we collect for the purposes of:

- providing our services to customers;
- providing information to potential or existing customers, their representatives, and end users, about our services and to assist with any enquiries about our service or requests for support;

- administering the services we provide, including to charge and bill our customers and to collect amounts our customers may owe us;
- marketing, promoting, and advertising our services and business;
- verifying information that has been provided to us;
- informing customers, their representatives, and end users, of additional products, services or information which may be of interest to them;
- providing contact details of our customers, their representatives, and end users, to our partners who have agreed to provide other offers, goods or services (if any);
- developing existing and new products and services;
- maintaining and updating our business infrastructure and systems;
- internal management and administration;
- security and occupational health and safety; and
- complying with any applicable law, regulation, legal process or government request.

These uses are necessary for our supply of our products and services and for our compliance with our legal obligations. If we do not collect and use personal information as set out in this policy, our ability to supply products or services to a customer (including its representatives or end users) may be limited.

We may also use endorsements provided by customers (including their representatives or end users), including any visual images provided, to promote and advertise our business, products, and services. We market our services to existing customers via mail or email. You or your representative can opt out from receiving such marketing by contacting us using the contact details provided in this Policy or on our website, or the "unsubscribe" feature provided in those messages.

We do not keep personal information for any particular period of time, unless we are required to do so by law.

7. WHEN WE DISCLOSE PERSONAL INFORMATION

We do not disclose any personal information we collect to third parties except:

- when the relevant person asks us to do so;
- to our officers, employees, contractors, agents, consultants, insurers, suppliers, commercial partners, or affiliated companies, for the purpose of providing our or their products or services;
- to comply with any applicable law, regulation, legal process or government request; and
- for the purposes of facilitating or implementing a transfer/sale of all or part of our assets or business.

We do not disclose any personal information to overseas organisations.

8. INTEGRITY AND SECURITY OF PERSONAL INFORMATION

We endeavour to ensure that all personal information that we hold is accurate, complete and up-to-date. To assist us with this, individuals should contact us if any of their personal information changes, or if they believe that the personal information that we have is not accurate or complete.

When personal information that we collect is no longer required by us, we will destroy or de-identify that personal information within a reasonable time unless we are required by a law or a court/tribunal to retain the personal information.

We may retain personal information for so long as it is required for any of our business purposes, for the prevention of fraud, for insurance and governance purposes and in our ordinary back-ups and archival records.

We also take reasonable steps to protect personal information from misuse, loss, unauthorised access, modification or disclosure. However, the open nature of the internet is such that information exchanged via the internet may be accessed and used by people other than those for whom the data is intended. Any personal information is therefore sent via the internet or email at your own risk. You should also be aware that no system is completely secure against attack by malicious actors.

You should contact us immediately if you believe that there has been unauthorised access or disclosure with respect to any personal information that we hold about you.

9. NOTIFIABLE DATA BREACHES

We will notify affected individuals and the Office of the Australian Information Commissioner about any data breach that is likely to result in serious harm to the affected persons. There are exceptions where notification is not required, for example where we have already taken appropriate remedial action that removes the risk of serious harm to any person, or where that person's direct relationship is with a third party (in which case we will assist the third party to provide such notice to the affected person).

10. HOW TO ACCESS OR CORRECT PERSONAL INFORMATION

Individuals are entitled to have access to, and seek correction of, any personal information that we may hold about them, subject to the grounds for refusal under the Act.

If any individual would like to access their personal information we hold or would like to correct any errors in that information, please contact us with a written request addressed to our Privacy Officer via the details provided in this Policy, so that we can consider and respond to the request. We may apply an administrative charge for providing access.

We will take appropriate steps to verify the identity of the person requesting the information (or verify that the requestor is authorised to make the request on behalf of the individual concerned) before granting access to any personal information.

We will respond to a request for access to personal information within a reasonable time after receiving the request and, if access is granted, access will be provided within thirty (30) days from request. Where the request for access is accepted, we will provide access to the requested personal information in the manner requested, providing it is reasonable to do so.

Any request for correction will be dealt with within thirty (30) days (or such longer period as agreed).

We will accept a request for correction of personal information where we are satisfied that the personal information is inaccurate, out-of-date, incomplete, irrelevant or misleading.

Upon accepting a request for correction of personal information, we will take all steps that are reasonable in the circumstances, having regard to the purpose for which the information is held, to correct the personal information.

If we deny a request for access or correction, we will provide written details of the reasons for the refusal and the process for making a complaint about the refusal.

If we refuse to correct the personal information, the individual has the right to associate with the information a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading. We will take such steps as are reasonable in the circumstances to associate that statement with all records we hold that contain the relevant information.

11. HOW TO MAKE A PRIVACY COMPLAINT

The contact details provided below can also be used to contact us if an individual has a privacy complaint against us.

Attention: Privacy Officer
RIoT Solutions Pty Ltd

Office address: Level 4, 60 Edward Street
Brisbane CBD QLD 4000

Postal address: PO Box 10087
Adelaide Street
Brisbane, QLD, 4000

Phone: 1300 744 028
Email: privacy@riotsolutions.com.au

We are committed to acknowledging any such complaint in a prompt manner and will give an estimated timeframe (not more than thirty (30) days) for when we will respond to the complaint.

While we hope that we will be able to resolve any complaints, individuals may also lodge a complaint with a relevant regulator such as the Australian Information Commissioner (www.oaic.gov.au).

The contact details for the Office of the Australian Information Commissioner are:

Postal address: GPO Box 5218
Sydney NSW 2001

Phone: 1300 363 992
Facsimile: +61 2 9284 9666
Email: enquiries.oaic.gov.au

12. GENERAL

This Policy does not create any rights or obligations that may be legally enforced beyond the right and obligations provided by the Act.

This Policy may be amended by us from time to time. We will publish any updated versions of this Policy on our website. Each time an individual visits our website, use our services or otherwise provide us with personal information, they are deemed to have consented to any amended versions of this Policy that are published on our website.