

## Privacy Policy

### Protegas Australia Pty Ltd

#### 1. Overview

Thank you for using Protegas Australia Pty Ltd (**Protegas**), a platform that delivers intelligence professional services to industry and the public sector. Your privacy is important to us and we are committed to protecting your privacy in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**), which includes the Australian Privacy Principles (**APPs**) and any related privacy codes.

This Policy outlines how we collect, use, disclose and store your personal information and lets you know how you can access that information. This Policy applies to our obligations when handling information in Australia.

Please read this Policy carefully and contact us using the details below if you have questions.

#### 2. What personal information do we collect and why do we collect it?

Information Collected	Why we collect it	How we collect it
<b>About our users</b>		
<ul style="list-style-type: none"> <li>Your name, email address and phone number.</li> <li>Date of birth.</li> <li>Gender identity.</li> <li>Your nationality and which countries you hold citizenship of.</li> <li>Educational details, such as schools you have attended, any qualifications you have received, transcripts and/or English language test results.</li> <li>Employment details, such as a CV, qualifications attained or examples of work.</li> <li>Study and career aspirations, such as where you want to study or what qualifications you hope to achieve.</li> <li>Any photos that you upload, such as a profile picture.</li> <li>Your device ID, device type and information, geo-location information, Internet Protocol (IP) address, standard web log information browser session data, device and network information, statistics on page views, acquisition sources, search queries, browsing</li> </ul>	<ul style="list-style-type: none"> <li>For the purpose for which the personal information was originally collected.</li> <li>To identify and interact with you.</li> <li>To perform administrative and operational functions.</li> <li>To comply with any legal requirements, including any purpose authorised or required by an Australian law, court or tribunal.</li> <li>For any other purpose for which you give your consent.</li> </ul>	<p>Directly from you when you:</p> <ul style="list-style-type: none"> <li>use our services;</li> <li>set up a profile with us through our learning management system;</li> <li>interact or share personal information with us via our platforms and social media; and</li> <li>communicate with us.</li> </ul> <p>Through our third party service providers when you or we provide the relevant personal information to them so that they can create a profile for you on their platform.</p>

behaviour and information gathered through internet cookies. <ul style="list-style-type: none"> <li>Information contained in any communications between you and us.</li> </ul>		
<b>About our general users that have may not subscribed to our Service but interact with us</b>		
<ul style="list-style-type: none"> <li>Information you have provided in communications we have with you.</li> <li>Information about your access and use of our website, including browser session data, device and network information, statistics on page views, acquisition sources, search queries, browsing behaviour and information gathered through internet cookies.</li> </ul>	<ul style="list-style-type: none"> <li>To identify and interact with you.</li> <li>To perform administrative and operational functions.</li> </ul>	
<b>About contractors or prospective staff members</b>		
<ul style="list-style-type: none"> <li>Your name, email address and phone number.</li> <li>Your nationality and which countries you hold citizenship of.</li> <li>Educational details, such as schools you have attended, any qualifications you have received, transcripts and/or English language test results.</li> <li>Employment details, such as a CV, qualifications attained or examples of work and relevant financial institution/details for wage/superannuation payments.</li> </ul>	<ul style="list-style-type: none"> <li>To enable us to carry out our recruitment functions.</li> <li>To correspond with you.</li> <li>To fulfil the terms of any contractual relationship.</li> <li>To ensure that you can perform your duties.</li> </ul>	

If you choose not to provide information as requested, we may not be able to service your needs. For example, it will not be possible for us to provide you with our service if you want to remain anonymous or use a pseudonym. We sometimes receive unsolicited personal information. In circumstances where we receive unsolicited personal information we will usually destroy or de-identify the information as soon as practicable if it is lawful and reasonable to do so unless the unsolicited personal information is reasonably necessary for, or directly related to, our functions or activities.

### **3. Sensitive information**

We may ask for or collect sensitive information from individuals. We will only collect sensitive information to provide our services to you or for the purposes of your employment. Examples of sensitive information we may collect include dietary requirements and police checks.

Aside from when we ask you to, you should not upload sensitive information to your account.

#### **4. Disclosing your personal information**

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We may disclose your personal information to the following third parties:

- (a) our business or commercial partners;
- (b) our professional advisers, dealers and agents;
- (c) third parties and contractors who provide services to us, including customer enquiries and support services, IT service providers, data storage, webhosting and server providers, marketing and advertising organisations, payment processing service providers;
- (d) payment system operators and debt-recovery functions;
- (e) third parties to collect and process data, such as ACORN, Google Analytics; and Amazon Web Services.
- (f) any third parties authorised by you to receive information held by us.

If you are a contractor, we may disclose your information to payment system operators and debt-recovery functions.

We may also disclose your personal information if we are required, authorised or permitted by law.

#### **5. Using your personal information for direct marketing**

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From time to time, and in support of our future development and growth, we may use your personal information to contact you to promote and market our products and services.

You can opt-out from being contacted for direct marketing purposes by contacting us at [contact@protegas.com.au](mailto:contact@protegas.com.au) or by using the unsubscribe facility included in each direct marketing communication we send. Once we receive a request to opt out from receiving marketing information, we will stop sending such information within a reasonable amount of time.

#### **6. Security**

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We take all reasonable steps to protect personal information under our control from misuse, interference and loss and from unauthorised access, modification or disclosure. We hold your personal information electronically in secure databases operated.

Our servers are hosted with industry leading providers and are rebuilt with each deployment to prevent persistent access to rogue services. Server access and deployment are limited to revokable access keys that can only be regenerated on a master account. Access to servers can only be gained by using industry standard encryption keys that are generated and regularly updated, including when employees leave Protegas.

User logs redact certain types of information, such as passwords, before they are logged to prevent user information leaking to third parties.

Servers and databases are limited to internal access only to prevent database access to the public, unless it relates to certain whitelisted services or for monitoring and troubleshooting

While we take reasonable steps to ensure your personal information is protected from loss, misuse and unauthorised access, modification or disclosure, security measures over the internet can never be guaranteed.

We encourage you to play an important role in keeping your personal information secure, by maintaining the confidentiality of any passwords and account details used on our website.

## **7. Accessing or correcting your personal information**

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If you would like to access your personal information, please contact us using the details below. In certain circumstances, we may not be able to give you access to your personal information, in which case we will write to you to explain why we cannot comply with your request.

We try to ensure any personal information we hold about you is accurate, up-to-date, complete and relevant. If you believe the personal information we hold about you should be updated, please contact us using the details below and we will take reasonable steps to ensure it is corrected if appropriate.

## **8. Destroying or de-identifying personal information**

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We destroy or de-identify personal information when we no longer need it unless we are otherwise required or authorised by law to retain the information.

## **9. Making a complaint**

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If you believe your privacy has been breached or you have a complaint about our handling of your personal information, please contact us using the details below.

We take privacy complaints seriously. If you make a complaint, we will respond within 5 days to acknowledge your complaint. We will try to resolve your complaint within 30 days. When this is not reasonably possible, we will contact you within that time to let you know how long we will take to resolve your complaint.

We will investigate your complaint and write to you to explain our decision as soon as practicable.

If you are not satisfied with our decision, you can refer your complaint to the Office of the Australian Information Commissioner by phone on 1300 363 992 or online at [www.oaic.gov.au](http://www.oaic.gov.au).

## **10. Changes**

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We may, from time to time, amend this Policy. Any changes to this Policy will be effective immediately upon the posting of the revised Policy on our website. By continuing to use the services following any changes, you will be deemed to have agreed to such changes.

## **11. Contact us**

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All questions or queries about this Policy and complaints should be directed to:

Privacy Officer

Phone: 1300 INTEL AU

Email: [contact@protegas.com.au](mailto:contact@protegas.com.au)

This Policy was last updated in August 2023.