



# **DATADOT TECHNOLOGY LIMITED**

## **PRIVACY POLICY**

DataDot Technology Ltd ('DDT') respects your privacy and is committed to protecting your personal information. We are committed to complying with the *Privacy Act 2014* ('Act') and the Australian Privacy Principles ("APPs").

This Privacy Policy outlines the general information handling practices you can expect from DDT. If you require any further information concerning privacy and the ways in which we handle your personal information, please contact us via the contact details set out below.

### **A COLLECTION OF PERSONAL INFORMATION**

- A.1 DDT only collects personal information that is necessary for one or more of our functions or activities.
- A.2 The types of personal information we collect and the purposes for collection will depend upon the particular circumstances. If you are a customer of DDT, we will obviously require details such as your name, contact details, the services that you require and such other personal information as may be necessary to enable us to provide our products and services to you.
- A.3 We also collect and use your personal information in order to keep you updated as to new products and services which we may offer you from time to time, to inform you about developments in our technology, to tailor our services to better suit your needs and for billing purposes.
- A.4 The specific types of information we collect and reasons for collection may vary depending upon the particular circumstances.
- A.5 If you provide DDT with incorrect information, we may not be able to provide services to you.
- A.6 If you are a visitor to our website, we will generally not collect personal information about you (for further information on our Internet Privacy practices, please see below).
- A.7 DDT will not collect sensitive information from its customers unless they specifically choose to provide us with that information. Sensitive information includes information

relating to racial or ethnic origin, political opinions, religious beliefs, sexual preferences, health and philosophical beliefs.

## **B USE AND DISCLOSURE OF PERSONAL INFORMATION**

- B.1 DDT's policy is to use your personal information only for the purpose or purposes for which it was collected.
- B.2 DDT will not rent, sell or trade your personal information to or with any third party without your consent.
- B.3 DDT may disclose personal information to third parties in the following circumstances:
- (a) disclosures to external service providers who help us operate our business, provided that, where relevant or if required, DDT will take reasonable steps to require those service providers to comply with the Act;
  - (b) if you have consented to the disclosure; and
  - (c) disclosures we are required or authorised to make by law or permitted to make under the Act.
- B.4 In general, the types of organisations to which DDT may disclose your personal information are those organizations that provide services that assist us in supplying to you, or in administering, the products and services you require.
- B.5 In addition, DDT may out-source some of the services it provides to you and that process may involve disclosing personal information about you to other organisations. Such organisations may include DDT's related entities, printing and mailing houses, accounting and legal advisors, collection agents, conveyancing and settlement agents and marketing consultants.
- B.6 It may also be necessary for DDT to disclose personal information to investors in or purchasers of equity in DDT itself.
- B.7 DDT will take all reasonable steps to ensure that any organisations to which your personal information is provided will use the information only to the extent which is necessary to provide the services we require from them or strictly for the purpose for which the information is provided and will ensure that all such organisations are subject to confidentiality agreements.
- B.8 DDT co-operates with law enforcement inquires and other third parties to enforce legal, intellectual property and other rights. DDT may be required to disclose information about you to law enforcement or other governmental officials as we, in our sole discretion, believe necessary, appropriate or as otherwise permitted under the Act in connection with



an investigation of fraud, intellectual property infringements, piracy or any other activity that is illegal or may expose us to legal liability.

- B.9 In some circumstances, DDT may be required to give some personal information about you to other government organisations, such as the Australian Taxation Office, to comply with our legal obligations.
- B.10 Where appropriate, DDT will seek your consent before complying with any third party requests for personal information.

## **C MARKETING INFORMATION**

- C.1 We will not use your personal information for direct marketing or disclose your personal information to another organisation for use in direct marketing unless we obtain your consent or you would reasonably expect us to do so.
- C.2 You may, at any time, advise us that you wish to opt out of any direct marketing communication by using the opt-out mechanism at the time of registering an asset on the electronic forms for registering assets or by sending an email to [info@datadotdna.com](mailto:info@datadotdna.com).

## **D CREDIT REFERENCES**

- D.1 In the event that you wish to obtain any of our goods and services on credit (payment being made in excess of 7 days of delivery of any products or services), we are allowed, under the Act, to give a credit reporting agency information about your or your company's credit application. The information, which may be given to an agency, is referred to in Section 18 of the Act and could include such matters as details of payments which become more than 60 days overdue or cheques drawn by you which have been dishonoured more than once.
- D.2 In the event that you wish to obtain any of our goods and services on credit, we may obtain from a credit reporting agency a credit report containing personal information about your credit worthiness.

## **E SECURITY OF INFORMATION**

- E.1 DDT takes reasonable steps to protect the personal information we hold about you from misuse, loss, unauthorised access, modification or disclosure.
- E.2 Specifically our security measures include:
- Firewalls to prevent hacking of our databases



- Clauses in employee agreements requiring confidentiality
- Appropriate security access to our office premises
- The use of passwords to access database information
- Document shredders for the disposal of written information

- E.3 If we hold personal information about you and that information is no longer needed by us, we will take reasonable steps to destroy or permanently de-identify the relevant information.
- E.4 Your personal information is kept on an electronic database which is accessible only by management and authorised personnel of DDT. Any hard copies (such as printouts) of your personal information will be retained securely and will only be accessible to DDT management and authorised personnel.

## **F ACCESS AND CORRECTION**

- F.1 Upon request, you may be provided with access to the personal information DDT holds about you.
- F.2 If you would like to make a request for access, please set out your request in writing and send it to our Privacy Compliance Officer at the contact details set out below. We reserve the right to charge any reasonable costs incurred by us in providing access.
- F.3 If you feel that any personal information DDT holds about you is not accurate, complete and up-to-date, please contact our Privacy Compliance Officer at the contact details set out below. We will then take reasonable steps to ensure that your personal information is corrected.

## **G INTERNET PRIVACY**

- G.1 In general, you can visit our website without revealing personal information about yourself. However, some other types of information may be automatically collected, which do not personally identify you to DDT.
- G.2 When you visit our website, our internet service provider and website managers may make a record of your visit, logging information such as your email address and/or the domain name of your internet service provider (if applicable), the date and time of your visit, the pages accessed, the domain where you clicked through from, the type of browser you have used and the type of computer operating system you are using. This information is collected for trend and statistical purposes, and so that DDT can enhance its website's functions and capabilities by understanding its customers better.
- G.3 Our website makes use of cookie technology to provide you with a better and more efficient service next time you visit our website, and to help us tailor the website or



advertisement to better match your interests and preferences. Cookies are unique identifiers which are sent from our website to your computer or system (PC), tracking the web pages you have visited. Cookies enable us to relate your use of the website to information that you have specifically provided to us (such as a password for any service we may provide via the website) and allow your web browser to track searches you have performed on our website. Cookies are stored on your PC, not on our servers. You can generally elect to disable cookies, erase cookies from your computer hard drive, or receive a warning before a cookie is stored. This may be done through your internet browser setting options.

- G.4 DDT's websites contain links to other websites and DDT accepts no responsibility for the content of those sites or the privacy practices of the operators of those sites.
- G.5 If you enter into an online transaction with DDT, that transaction will be governed by the terms of this policy.

## **H ONLINE ORDERING**

- H.1 Our Online Ordering facility uses Secure Sockets Layer (SSL) protocol to safeguard your information during online transactions. This 128-bit SSL protocol allows for messages to be encrypted (scrambled) so that the information sent between your computer and ours is meaningless to anyone else. We only use 128-bit security. If a customer tries to access our Online Ordering facility with a browser that does not support 128-bit SSL, they are advised as such and cannot continue.
- H.2 As part of the Online Ordering facility, when you log on, a session object is created to pass encrypted (secured) information from one screen to another. This session ID is not written to your hard disk, but stored in memory. Once your Online Ordering session is terminated, the session object is destroyed. However, to be able to utilize a session object, your browser must have cookies enabled.

## **I CHILDREN UNDER 18 YEARS OF AGE**

- I.1 DDT does not intend to collect personal information from individuals under 18 years of age.
- I.2 Unless otherwise disclosed during collection, DDT will not provide any personally identifying information it knowingly receives from individuals under 18 to any third party for any purposes whatsoever.
- I.3 Where appropriate, DDT will specifically instruct individuals under 18 not to submit such information on our websites or advertisements without the consent of a parent or guardian.



## **J TRANSFERRING INFORMATION OUT OF AUSTRALIA**

- J.1 In dealing with your personal information in any of the ways contemplated in this privacy policy, it may be necessary for DDT to transfer that information to a recipient overseas. The countries in which such recipients are likely to be located are the United Kingdom and United States of America.
- J.2 Subject to J.3, before we disclose personal information to an overseas recipient we will take such steps as are reasonable in the circumstances to ensure the overseas recipient does not breach the APPs. J.3 The provisions of clause J.2 will not apply in the event:
- (a) we reasonably believe that the overseas recipient is subject to a law or scheme that has the effect of protecting the information in a way that overall is at least substantially similar to the way in which APPs protect the information and there are mechanisms you can access to take action to enforce that protection of the law or binding scheme; or
  - (b) we expressly inform you that if you consent the provisions of clause J.2 will not apply and after being so informed you consent to the disclosure.

## **K DDT CONTACT DETAILS**

- K.1 The Act gives you rights to access the personal information we hold about you and you can obtain this information by providing us with a written request. You can also ask us to correct any information which is inaccurate.
- K.2 To contact the Company about privacy issues or consents please contact our Company Secretary as shown below:

The Company Secretary  
DataDot Technology Ltd  
P.O Box 6245  
Frenchs Forest DC  
NSW 2086

Telephone: (02) 89774900  
Email: [info@datadotdna.com](mailto:info@datadotdna.com)

## **L COMPLAINTS**

- L.1 If you have a complaint about a breach of APPs then you can address that complaint in writing to:

The Company Secretary



DataDot Technology Ltd  
P.O Box 6245  
Frenchs Forest DC  
NSW 2086

Email: [info@datadotdna.com](mailto:info@datadotdna.com)

- L.2 Alternatively, if you an employee of DDT then you can discuss the complaint with the Company Secretary who will make a record of the complaint in sufficient detail to enable it to be properly investigated.
- L.3 Upon receipt of a complaint DDT will:
  - (a) immediately acknowledge receipt of the complaint;
  - (b) thereafter investigate the matter; and
  - (c) respond to the complaint within a maximum of 45 days of receipt of the complaint advising of the outcome of your complaint.
- L.4 In the event that DDT finds there has been a breach of the APPs, then DDT will take immediate steps to rectify the breach and/or prevent the breach continuing.
- L.5 In the event you are not satisfied with DDT's response to your complaint then you can request that DDT refer the complaint for external dispute resolution.

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