

PRIVACY POLICY

1. About this Policy

- 1.1 This privacy policy (**Privacy Policy**) sets out the principles that M1 Security Services Pty Ltd trading as M1 Security (ABN 24 631 974 493) together with each of their companies, businesses, brands and divisions (**M1**), will follow in the management of your personal information (**Personal Information**).
- 1.2 M1 at its absolute discretion, reserves the right to change this Privacy Policy in line with relevant legislation and / or business needs. Should this occur, the updated version of this Privacy Policy will be made available via our Human Resources Department. We may highlight changes to this Privacy Policy on our website/s, but you are encouraged to check this Privacy Policy for changes.
- 1.3 M1 is committed to protecting the privacy of individuals and is bound by the Privacy Principles set out in the *Privacy Act 1988* (Cth) (**Act**). M1 will only collect, use or disclose Personal Information in accordance with the Act and this Privacy Policy. A copy of the Act, the Privacy Principles and guidance from the Office of the Australian Information Commissioner are available at www.oaic.gov.au.

2. Definitions

- a) **Act** means the *Privacy Act* (Cth) 1988 as amended from time-to-time.
- b) **Personal Information** means any information or opinion about you or from which you are readily identifiable. This might include a person's name, address, date of birth, photograph and bank account details.
- c) **Employee Record** means Personal Information relating to the employment of an employee. An Employee Record includes information about:
 - (i) the engagement, training, discipline or resignation of an employee;
 - (ii) the termination of an employee's employment;
 - (iii) the terms and conditions of employment of an employee;
 - (iv) the employee's personal and emergency contact details;
 - (v) the employee's performance or conduct;
 - (vi) the employee's hours of employment;
 - (vii) the employee's salary or wages;
 - (viii) the employee's membership of a trade union;
 - (ix) the employee's leave history; and
 - (x) the employee's taxation, banking and superannuation affairs

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d) **Sensitive Information** is information that is Personal Information and also relates to an individual's:

- (i) racial or ethnic origin;
- (ii) political opinions and affiliations;
- (iii) religious beliefs or affiliations;
- (iv) trade union membership;
- (v) sexual orientation;
- (vi) criminal record;
- (vii) health information;
- (viii) genetic information; and
- (ix) biometric information.

3. Collection and use of Personal Information

3.1 M1 will, from time to time, collect Personal Information in the course of its business.

3.2 We may use your Personal Information for the following purposes:

- a) the purpose for which it was collected (and related purposes which would be reasonably expected by you);
- b) purposes to which you have consented; or
- c) as otherwise authorised or required by law.

3.3 Generally, we will only use the Personal Information that we collect about you for purposes connected with our business operations. These purposes may include:

- a) for the purposes of conducting our business, including disclosure between our related entities together with our other businesses, brands and divisions;
- b) contacting you (including via personal email, SMS, by post or by phone or in any other lawful manner);
- c) verifying your identity;
- d) addressing any issues, problems or complaints that we or you have regarding our relationship;
- e) developing and improving our services and business; or
- f) as otherwise required by law (for example, to legal and regulatory authorities (such as the tax office), to accountants, auditors, lawyers and other outside professional advisers, and to companies who provide products and services to the company (such as IT systems suppliers, superannuation scheme providers, information management or administration service providers).

3.4 M1 does not generally collect Sensitive Information about individuals. If you provide Sensitive Information to us for any reason (for example if you provide us with health information) you consent to us collecting, using and disclosing that information for the purpose for which you disclosed it and as permitted by the Act. We will handle any Sensitive Information that we receive in accordance with this Privacy Policy and the Act.

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- 3.5 The types of Personal Information M1 collects and the purposes for which that Personal Information is used will depend on the circumstances. Some examples of the types of information that M1 ordinarily collects in certain situations and how it is ordinarily used are set out below.

Employees

- 3.6 M1 may collect Personal Information from its employees in connection with their employment, such as an employee's name, address, date of birth, photographs and bank account details.
- 3.7 Any Personal Information held by M1 which is directly related to an employee's employment with M1 and deemed to be an Employee Record will be exempt from compliance with the Act. M1 may be required to disclose the Personal Information of its employees, from time to time, for the purposes of conducting its business or otherwise in accordance with this Privacy Policy.
- 3.8 M1 may, from time to time, obtain Sensitive Information about its employees, either directly or indirectly. Sensitive Information collected from employees may include health information and biometric data. Where M1 comes into possession of Sensitive Information relating to an employee the information will only be used for the purposes for which it was obtained. Where possible, M1 will notify employees before collecting Sensitive Information. M1 will also take reasonable steps to protect the Sensitive Information that it collects from employees.
- 3.9 Employees with responsibility for or access to Personal Information and / or Sensitive Information must not disclose that information in a way that is inconsistent with this Privacy Policy or the Act. Employees must take all reasonable and necessary precautions to maintain the secrecy of and prevent the disclosure of Personal Information and / or Sensitive Information. This includes the handling and storing of such Personal Information and / or Sensitive Information.
- 3.10 Employees found to be in breach of this Privacy Policy may be subject to disciplinary action, including termination of employment.
- 3.11 This Privacy Policy does not and will not form part of an employee's current or prospective employment agreement. The Privacy Policy operates in addition to any obligation as contained in the employee's employment agreement.

Clients

- 3.12 In general, M1 collects Personal Information from our clients, or individuals at a client's organisation, in the course of providing or offering services to our clients. We collect Personal Information from clients such as name, contact information (including postal and e-mail address and telephone numbers), service preferences, payment and banking details and other information relating to clients' dealings with us.
- 3.13 We generally use this Personal Information to assist in the supply of our services to clients, for promotional purposes and for our internal administrative purposes.

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- 3.14 M1 Collects Personal Information from clients in multiple ways including directly from a client when they provide it to us (or via our agents or contractors) including when a client:
- a) visits our websites, reads or clicks on an email from us;
 - b) engages with or procures our services;
 - c) responds to an email survey or other publication; or
 - d) otherwise contacts us.
- 3.15 We may also generate Personal Information about clients from information that we have. For example, by analysing our records of a client's use of our services or the client's previous dealings with us.
- 3.16 We may also collect Personal Information about clients from publicly available resources or (in circumstances where it is unreasonable or impractical to obtain it from the client directly) from third parties.

Applicants for employment

- 3.17 M1 collects a range of Personal Information about applicants for employment such as name, contact information (including postal and e-mail address and telephone numbers), employment and training history and any other information included as part of an application, resume or curriculum vitae. We may also obtain Personal Information from psychological or aptitude tests and from referees. This information is used to assess a person's suitability for available employment positions. This information is collected when an applicant submits an application for employment.
- 3.18 Applicants for employment agree to M1 collecting, using and disclosing the information for the purposes for which it was disclosed and to the extent permitted by the Act.
- 3.19 Where M1 holds Personal Information from a previous employment application, the applicant can request to access the Personal Information in accordance with clause 6 of this Privacy Policy. The request must be provided to M1 within a reasonable timeframe and must particularise the information sought and the purpose for which the information is sought. M1 will provide access unless an exception to access applies under the Act.
- 3.20 M1 will take reasonable steps to destroy all Personal Information it holds if the information is no longer required for the purpose for which it was obtained.

Suppliers and Contractors

- 3.21 The Personal Information M1 collects about suppliers or contractors who are individuals generally includes name, contact information (including postal and e-mail addresses and telephone numbers), payment and banking details. We use that information for our transactions with such persons, our internal administrative purposes related to our relationship with that person as a supplier or contractor and in building and managing our commercial relationships. This information is collected when a supplier or contractor contacts us, responds to a request for services, or otherwise offers to supply us with goods or services.

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General information collected from visitors to our websites

- 3.22 When you use our websites, M1 may also collect “clickstream” information (such as which areas of our websites you have accessed, the time and date of access, the type of browser software used, your IP address and the previous website you visited). We may also collect “cookie” information (such as user preferences relating to your use of the website). This information is used for a number of purposes including to customise and improve M1 websites. You can adjust your internet setting to disable “cookies” at any time. However certain aspects of our websites may require this information to function and may not be available or perform optimally if this information is not collected.

4. Disclosure of Personal Information

- 4.1 M1 may disclose or provide access to your Personal Information to third parties in connection with the purposes described in section 2 of this Privacy Policy. We may disclose your Personal Information:
- a) for the purposes of conducting our business, including disclosure between our related entities together with our other businesses, brands and divisions;
 - b) to third party contractors appointed by M1 to perform services for us or on our behalf (such as marketing agencies, customer service organisations, parties who provide credit card processing services and website and data hosting providers);
 - c) to our professional advisors, accountants, insurers, lawyers and auditors on a confidential basis;
 - d) in the unlikely event that we, or any of our assets, are or may be acquired by a third party, to that third party and its advisors;
 - e) in certain circumstances, to third parties that require information for law enforcement or to prevent a serious threat to public safety;
 - f) as required or authorised by law; or
 - g) otherwise with your consent.
- 4.2 M1 requires our contractors to keep Personal Information confidential and not to use or disclose it for any purpose other than performing services for us or on our behalf.
- 4.3 You should be aware that some information that you upload to parts of our websites or to our social media pages may be available to be viewed by the public. You should use discretion in deciding what information to upload to such sites.

5. Direct marketing

- 5.1 Direct marketing involves communicating directly with you for the purpose of promoting the sale of services to you. Direct marketing can be delivered by a range of methods including mail, telephone, email or SMS. We may use and disclose your Personal Information for the purpose of sending you direct marketing materials where:
- a) you have consented to us doing so; or
 - b) it is otherwise permitted by law.
- 5.2 You can unsubscribe from receiving direct marketing materials from us at any time by contacting us (see section 8 of this Privacy Policy).

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6. Security

- 6.1 M1 will take reasonable steps to ensure the Personal Information it holds about you is secure. However, except to the extent that liability cannot be excluded, we exclude all liability for the consequences of unauthorised access to your Personal Information.
- 6.2 You are required to notify us immediately on becoming aware of any actual or possible unauthorised disclosure of Personal Information or a contravention of this Privacy Policy.

7. Seeking access

- 7.1 You have the right to seek access to Personal Information which M1 holds about you or to update or correct that information.
- 7.2 M1 will grant access to Personal Information in accordance with the Act. There are a limited number of circumstances in which M1 may decline to grant such access. These are set out in the Act.
- 7.3 To request to access, verify, correct, or update any Personal Information we hold about you, please contact us (see section 8 of this Privacy Policy).
- 7.4 M1 will endeavour to acknowledge such requests as soon as practicable. If M1 is required to or otherwise agrees to grant access to the Personal Information, we will give access within a reasonable period of time. M1 will notify you of the method by which it will give you access to the information. Where permitted by law, M1 may charge an administrative fee for granting access to information. You will be notified prior to incurring this administrative fee.
- 7.5 If M1 refuses to grant access to Personal Information, it will inform you of the grounds on which access is denied and advise you of your options to seek to have that decision reviewed.

8. Complaints about privacy

- 8.1 If you are concerned that M1 may have breached its privacy obligations, the Act or this Privacy Policy please contact us (see section 8 of this Privacy Policy). When contacting us, please provide as much detail as possible in relation to your issue or complaint.
- 8.2 All complaints will be taken seriously and will be assessed by an appropriate person with the aim of resolving any issue in a timely and efficient manner. We request that you cooperate with us during this process and provide us with any relevant information we may require.
- 8.3 If you are not satisfied with our handling of your complaint, you may refer the issue to the Office of the Australian Information Commissioner (at enquiries@oaic.gov.au).

9. Questions about privacy

- 9.1 If you have any questions or concerns about M1's collection, use or disclosure of your Personal Information or if you would like to access, update or correct the information we hold about you, please contact Human Resources as follows:

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P: 03 9310 4066
E: operations@m1security.com.au