

PRIVACY POLICY

RESPECTING YOUR PRIVACY

Monitor Corporation Pty Limited ABN 16 617 555 647 and each of its related entities ("Monitor") takes its obligations under the Privacy Act, 1988 (Cth) ("Act") and the Australian Privacy Principles ("APPs") seriously. Monitor respects the right to privacy of its customers, suppliers, contractors, agents and others with whom it deals ("you/ your") and understands the need to protect your personal information.

Monitor is bound by the APPs and other Australian laws and codes relating to use and retention of personal information.

This Policy does not apply to information held by Monitor about its employees.

OUR PRIVACY POLICY

This Policy sets out how Monitor manages your personal information. It also describes, in general terms, the types of personal information Monitor holds, for what purpose and how that information is collected, used, stored and disclosed. This Policy applies to all your dealings with Monitor whether through our systems or infrastructure or directly with our personnel, agents or contractors. However, this Policy does not apply to the Personal Information You store within the products and systems we provide as part of our commercial offering to you ("Commercial Data"). Commercial Data is your property and will not be used or accessed by us for any purpose other than the provision, maintenance and security of the commercial systems we provide to you.

COLLECTING YOUR PERSONAL INFORMATION

We collect your personal information directly and indirectly from you and, in some cases, from other people or organizations.

As a provider of electronic information systems, personal information collected and maintained by Monitor generally comprises:

1. personal details required to identify you and your office such as name, address, drivers licence, date of birth and place of birth information;
2. contact details including phone number, fax number and email address;
3. credit card, financial institution and cheque information;
4. credit history including reports from credit reporting agencies;
5. business details such as company name, size and business type; and
6. unique identifiers such as user name, account number and password of your personnel.

This personal information is collected for the purpose of our commercial dealings with you including verification of the identity of your authorized personnel, performing credit worthiness checks in accordance with our credit policies and marketing our products and services.

Monitor does not collect information about a you or your personnel's racial or ethnic background, political views or persuasions, membership of any political, professional or trade association, trade union membership, religious belief or affiliation, philosophical belief, sexual preference or practice, criminal record or health information.

USE AND DISCLOSURE OF YOUR PERSONAL INFORMATION

Your personal information, as disclosed at the time of collection, is used by Monitor for the primary purpose of supplying you with our products and services. It is also used for ancillary purposes such as locating and identifying you and servicing our relationship with you.

Monitor may also use personal information collected for the purpose of marketing products and services, understanding your requirements, training our and your personnel and managing complaints or disputes. If you do not wish to receive direct marketing material from us, you may elect to "opt-out" by clicking on the link appearing on the marketing material or by notifying Monitor's privacy officer by email at privacy@monitorcorporation.com that you do not wish to receive marketing material.

Subject to the terms of this Policy, Monitor undertakes to you that it will not use or disclose your personal information unless such use or disclosure is authorised by you or in accordance with this Policy. Some examples of where such use or disclosure of your personal information would be authorised are:

1. as required or authorised at law;
2. as necessary to prevent a threat to life, health or safety;
3. as necessary to investigate suspected unlawful activity, to prevent or detect criminal activity or improper conduct;
4. as reasonably necessary for the preparation or conduct of court proceedings; or
5. where you have consented, either expressly or implicitly, to the disclosure of information about you.

Legislation under which Monitor may be authorised or required to collect or disclose your personal information includes the Anti-Money Laundering and Counter-Terrorism Financing Act 2006, Personal Property Securities Act 2009, Corporations Act 2001, Australian Securities and Investments Commission Act 2001, Income Tax Assessment Act 1997, Income Tax Assessment Act 1936, Tax Administration Act 1953, A New Tax System (Goods and Services Tax) Act 1999, Autonomous Sanctions Act 2011 and associated regulations and rules.

Your personal information may also be disclosed to or collected from:

1. customer, product, business and research organizations;
2. data partners, analytic consultants and data warehouses;
3. social media networks where people create, share or exchange information;
4. publicly available sources;
5. third parties Monitor has engaged to provide financial, accounting, administrative, advertising, marketing, internet communication, analytical and technology services ("Agents").

Whilst personal information may be provided to Agents to enable them to perform their tasks, such information remains the property of Monitor. By accepting the terms of this Policy, you consent to the disclosure of your personal information by Monitor in accordance with this Policy.

WEBSITE INTERNET TRACKING TECHNOLOGY & SECURITY

We use cookies and other tracking technologies on our websites. We may also partner with third party advertising networks to either display advertising on our website. Monitor and its partners may use cookies, tracking technologies, widgets and electronic images known web beacons (sometimes called single-pixel gifs) to collect information that does not contain personal information about you such as your browsing activities on our website and other websites in order to provide targeted marketing based on your interests. If You do not wish to have information

collected through the use of cookies, we recommend that you disable cookies in your browser. There are also web services available if You wish to control what information is collected about you, such as Google's Ads Preferences Manager.

Monitor's website may include links to other websites whose privacy practices differ from ours. If you submit personal information to any of those sites, your personal information is governed by their privacy terms (if any). Monitor encourages you to carefully read the privacy terms of each website you visit.

Our website may include widgets which are interactive mini-programs that run on the site to provide specific services from another organisation (e.g. to display news, commentary, etc). Personal information, such as your email address, may be collected through a widget. Information collected by the widget is governed by the privacy terms of the organisation that created the widget.

Our website may offer publicly accessible blogs or community forums. You should be aware that any information you provide in these forums may be read, collected and used by others who access our website. Monitor will not be responsible for such use of your information.

OVERSEAS DISCLOSURE

Monitor may use Agents whose operations, systems or databases are located outside Australia including in the United Kingdom and United States of America ("Overseas Recipient"). Prior to disclosing personal information to an Overseas Recipient, Monitor will take reasonable steps to seek assurance that the Overseas Recipient will not breach the APPs in relation to personal information provided by DKS. Subject to the APPs, Monitor will only disclose personal information to Overseas Recipients in accordance with this Policy. You consent to such disclosure.

Monitor will not disclose your Commercial Data to any Overseas Recipient without your express written consent.

PERSONAL INFORMATION SECURITY

Monitor keeps personal information about its customers secure and takes reasonable precautions to minimize the likelihood of loss, misuse or unauthorised access, modification or disclosure or alteration of such information.

USE OF GOVERNMENT IDENTIFIERS

In certain circumstances, Monitor may be required to collect government identifiers from you such as your tax file number or in the case of your officers, verification information such as drivers licence, medicare, health or pension card number etc. Monitor does not use or disclose this information other than as required or authorised by law.

DESTRUCTION OF PERSONAL INFORMATION

Monitor takes all reasonable steps to ensure that personal information about its customers and their personnel is destroyed when it is no longer required.

ACCESS TO YOUR PERSONAL INFORMATION

Monitor will give you access to the personal information which it holds about you. Your right to access your personal information as held by Monitor is subject to certain exceptions permitted by law. Your right to access your personal information may be affected by matters such as:

1. the information being commercially sensitive to Monitor;
2. access posing a threat to life or health of any individual;
3. access having an unreasonable impact on the privacy of others;
4. access being unlawful;

5. access prejudicing enforcement activities relating to criminal conduct or other breaches of law;
6. a frivolous or vexatious request by you or some other person on your behalf;
7. the existence of a legal dispute or potential legal dispute; and
8. denial of access being required or authorised by law.

If Monitor denies you access to your personal information, Monitor will provide an explanation for doing so. For most requests, your information will be provided free of charge, however Monitor may charge a fee to cover its reasonable costs of retrieving and supplying that information.

STORAGE OF PERSONAL INFORMATION

Monitor stores your personal information on its systems. Monitor has adopted appropriate steps to minimize the risk of loss, misuse, unauthorized access to, interference with, modification of or unauthorized disclosure of your personal information. Where personal information is no longer required appropriate steps are taken to destroy or de-identify that information. Whilst the utmost care is taken with your personal information, Monitor cannot guarantee that personal information stored or transmitted using Monitor systems will not be lost, misused, intercepted, interfered with, subject to unauthorized access or disclosure or otherwise secure.

OPT-OUT IN RESPECT OF MARKETING MATERIALS

Monitor acknowledges and respects its customers' choice to "opt-out" of direct marketing communication activities undertaken by US. If you do not wish to receive direct marketing or other promotional material from US, please contact our privacy officer by email at privacy@monitorcorporation.com and indicate the particular marketing or promotional material you do not wish to receive.

MAINTAINING YOUR PERSONAL INFORMATION

Monitor aims to ensure that all personal information held about you is collected and used in accordance with this Policy. This means that from time to time, Monitor may contact you to see if there are any changes to your personal information.

The accuracy and completeness of personal information we hold about you will depend on you providing accurate, complete and up-to-date personal information to us when you have dealings with Us. Monitor will take reasonable steps to ensure that the personal information we hold about you is accurate and up-to-date. If you believe personal information we hold about you is not accurate, complete and up-to-date or is otherwise misleading, please contact us and we will take steps to correct the information.

OBTAINING MORE INFORMATION ABOUT YOUR PRIVACY RIGHTS

More information about your privacy rights, the Act or the Australian Privacy Principles is available from the Federal Privacy Commissioner's website at www.privacy.gov.au.

RESOLVING YOUR PRIVACY CONCERNS

We have nominated a Privacy Officer, to manage any privacy complaints. If you have any questions about our privacy practices or wish to make a complaint about how your personal information is managed, please contact our Privacy Officer by email at privacy@monitorcorporation.com. Any privacy complaint will be handled by Monitor in accordance with this Policy. Monitor will respond to complaints as soon as practicable.

CHANGES TO THIS POLICY

We reserve the right to make changes to this Policy from time to time. Any changes to the Policy will be published on our website. We encourage you to periodically review this Policy for the latest information on our privacy practices.

CONTACTING US

To review and update your personal information or to obtain a copy of this Policy, please contact our Privacy Officer by email at privacy@monitorcorporation.com.

Monitor Corporation Pty Limited
ABN 16 617 555 647