

FLAIM SYSTEMS - GLOBAL PRIVACY POLICY

In this policy, the words “we”, “us” and “our” means **Flaim Systems Pty Ltd ABN 71 620 462 946** of ManuFutures Building NP, Deakin University Campus, 75, Pigdons Road, Waurin Ponds, VIC 3216, Australia.

We are committed to protecting and respecting your privacy.

This Global Privacy Policy explains how and why we collect, use, hold and disclose your personal information, how we use the data and with whom we share it. You consent to us collecting, holding, using and disclosing your personal information in accordance with this policy.

Our privacy practices may vary among the countries in which we operate and to reflect local practices and legal requirements (“**Applicable Data Protection Laws**”). In most cases this will be the law of the country in which you are located.

It is important to acknowledge that we collect, hold, use and disclose personal information in accordance with the *Privacy Act 1988 (Cth) Australia* (**Privacy Act**) and other Applicable Data Protection Laws.

WHAT IS PERSONAL INFORMATION?

Personal information is any information or an opinion about an identified individual or an individual who can be reasonably identified from the information or opinion. Information or an opinion may be personal information regardless of whether it is true.

WHAT PERSONAL INFORMATION DO WE COLLECT AND HOLD?

We collect information about you and your interactions with us, for example, when you purchase any of our products, obtain quotes or complete orders for, or purchase or use any of our services, call us, email us or visit our website. The information we collect from you may include your contact details, your history of purchases, your use of our products and services and details of enquiries or complaints you make.

We may collect information about how you access, use and interact with our website. We do this by using a range of tools such as Google Analytics. This information may include:

- the location from which you have come to the site and the pages you have visited;
- technical data, which may include IP address, the types of devices you are using to access the website, device attributes, browser type, language and operating system.

COOKIES

We use cookies on our website. A cookie is a small text file that our website may place on your device to store information to remember something about you at a later time. We may use persistent cookies (which remain on your computer even after you close your browser) to store information that may speed up your use of our website for any of your future visits to the website. We may also use session cookies (which no longer remain after you end your browsing session) to help manage the display and presentation of information on the website. You may refuse to use cookies by selecting the appropriate settings on your

FLAIM

browser. However, please note that if you do this, you may not be able to use the full functionality of our website.

WHY DO WE COLLECT, HOLD AND USE YOUR PERSONAL INFORMATION?

We collect, hold and use your personal information so that we can:

- (a) provide you with products and services, and manage our relationship with you;
- (b) update and improve the functionality of our products and services;
- (c) develop new services and content, such as new and custom scenarios;
- (d) contact you, for example, to respond to your queries or complaints, or if we need to tell you something important;
- (e) comply with our legal obligations and assist government and law enforcement agencies or regulators; or
- (f) identify and tell you about other products or services that we think may be of interest to you.

If you do not provide us with your personal information, we may not be able to provide you with our services, communicate with you or respond to your enquiries.

HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

We will collect your personal information directly from you whenever you interact with us.

We may collect information from third parties such as:

- (a) Distributors and resellers of our products and services; and
- (b) Commercial partners, contractors and product champions authorised to represent us or deliver services on our behalf (as applicable).

HOW DO WE STORE AND HOLD PERSONAL INFORMATION?

We store most of your personal information in computer systems and databases operated by either us or our external service providers.

We implement and maintain processes and security measures to protect personal information which we hold from misuse, interference or loss, and from unauthorised access, modification or disclosure.

These processes and measure include:

- (c) the use of identity and access management technologies to control access to systems on which information is processed and stored;
- (d) requiring all employees to keep information secure;
- (e) monitoring and regularly reviewing our practises against our own policies and against industry best practice.

We will also take reasonable steps to destroy or de-identify your personal information once we no longer require it for the purposes for which it was collected or for any secondary purpose permitted under applicable laws.

TO WHOM DO WE DISCLOSE YOUR PERSONAL INFORMATION, AND WHY?

We may transfer or disclose your personal information to any related companies of ours, including our parent entity, Deakin University. Deakin University's privacy policy is accessible at <https://www.deakin.edu.au/footer/privacy>.

We may disclose your personal information to external service providers so that they may perform services for us or on our behalf. Some of our key service providers are:

- (a) **Microsoft** – which provides systems to run our business operations, whose privacy policy is accessible at <https://privacy.microsoft.com/en-gb/privacystatement>;
- (b) **Google Analytics**, mentioned above, whose relevant policies are accessible at <https://policies.google.com/privacy> and <https://firebase.google.com/policies/analytics/>;
- (c) **Hubspot**, our CRM system, whose privacy policy is accessible at <https://legal.hubspot.com/privacy-policy>;
- (d) **Unleashed**, our inventory management system, whose privacy policy is accessible at <https://www.unleashedsoftware.com/privacy-policy>;
- (e) **Xero**, our accounting system, whose privacy policy is accessible at <https://www.xero.com/au/about/legal/privacy/>; and
- (f) **VentraIP**, our website host, whose privacy policy is accessible at <https://ventraip.com.au/wp-content/uploads/2016/08/privacy-policy.pdf>.

We may also disclose your personal information to others where:

- (a) we are required or authorised by law to do so;
- (b) you may have expressly consented to the disclosure or your consent may be reasonably inferred from the circumstances; or
- (c) we are otherwise permitted to disclose the information under applicable laws.

If the ownership or control of all or part of our business changes, we may transfer your personal information to the new owner.

DO WE DISCLOSE PERSONAL INFORMATION TO OVERSEAS RECIPIENTS?

We may disclose your personal information to recipients which are located outside Australia.

Some of our key service providers, including Hubspot and Xero operate in the United States of America.

Other key service providers, Microsoft and Google, are primarily located in the United States of America and but also operate in a range of other countries. You can refer to those providers' privacy policies (noted above) for further information.

DO WE USE YOUR PERSONAL INFORMATION FOR MARKETING?

We will use your personal information to offer you products and services we believe may be interest you, but we will not do so if you tell us not to. These products and services may be offered by us, our related companies, our other business partners or our service providers.

Where you receive electronic marketing communications from us, you may opt out of receiving further marketing communications by following the opt-out instructions provided in the communication.

ACCESS TO AND CORRECTION OF YOUR PERSONAL INFORMATION

Applicable Data Protection Law may give you the right to access personal data held about you. This will usually be the case where you are based in Europe. Any request should be made in writing, and the best way for you to do so is to contact us at the details below. As we must be able to identify the person making the request, we request that you confirm any request made by you via different means by contacting us at the address stated below.

You may access or request correction of the personal information that we hold about you by contacting us. Our contact details are set out below. There are some circumstances in which we are not required to give you access to your personal information.

There is no charge for requesting access to your personal information but we may require you to meet our reasonable costs in providing you with access (such as photocopying costs or costs for time spent on collating large amounts of material).

We may reject requests and/or charge a fee where we are entitled to do so under Applicable Data Protection Laws, which may include where the request is manifestly unreasonable, in particular due to its repetitive or systematic nature, require disproportionate effort and/or risks the privacy or confidentiality of others.

We will respond to your requests to access or correct your personal information in a reasonable time and will take all reasonable steps to ensure that the personal information we hold about you remains accurate, up to date and complete.

YOUR RIGHTS UNDER GDPR

Under Applicable Data Protection Law, you may have certain rights regarding the personal data we maintain about you. We also offer you certain choices about what personal data we collect from you, how we use that personal data, and how we communicate with you.

You can choose not to provide personal information to us. You also may refrain from submitting personal data directly to us. To the extent provided by Applicable Data Protection Law, you may withdraw any consent you previously provided to us, or object at any time to the processing of your information. We will apply your preferences going forward. In some circumstances, withdrawing your consent to our use or disclosure of Your Information will mean that you cannot take advantage of certain products or services.

The rights above are likely to apply to you if you are based in Europe. The General Data Protection Regulation (**GDPR**) applies when Your Information is collected by us in Europe, and in these circumstances you will have certain rights in relation to your "personal data". Under the GDPR, personal data means "any information relating to an identified or identifiable natural person".

Please refer to the Contact Details section of this policy if you wish to make a data subject rights request or have a related request. The rights in this part are likely to apply to you if you are based in Europe.

COMPLAINTS

If you have a complaint about the way in which we have handled any privacy issue, including your request for access or correction of your personal information, you should contact us. Our contact details are set out below.

We will consider your complaint and determine whether it requires further investigation. We will notify you of the outcome of this investigation and any subsequent internal investigation.

If you remain unsatisfied with the way in which we have handled a privacy issue, you may approach an independent advisor or contact the Office of the Australian Information Commissioner (www.oaic.gov.au) for guidance on alternative courses of action which may be available.

CONTACT DETAILS

If you have any questions, comments, requests or concerns, or you would like to update your data or preferences you provided to us, please email us at: info@flaimsystems.com or write to us at:

Data Protection Officer
FLAIM Systems
ManuFutures Building NP, Deakin University Campus
75, Pigdons Road, Waurin Ponds, VIC 3216, Australia.

CHANGES TO OUR GLOBAL PRIVACY POLICY

From time to time, we may change our policy on how we handle personal information or the types of personal information which we hold. Any changes to our policy will be published on our website.

You may obtain a copy of our current policy from our website or by contacting us at the contact details above.

ISSUE DATE: 23rd September 2020