

This Policy governs how we may collect, use, hold and disclose your personal information, as well as how we maintain the quality and security of your personal information. It also explains how we may share information between any Related Body Corporate and with our network of approved suppliers.

### Personnel residing within the European Union

For the Privacy and Data Protection of personnel who reside within the European Union, compliance to the General Data Protection Regulation (GDPR) must be adhered to.

### Personal Information

Personal information is information about an individual whose identity is apparent or can reasonably be ascertained from the information. Personal information is not company information but may be information about an individual representative of a company.

If you provide us with your personal information you agree to us collecting, using, holding and disclosing your personal information in accordance with this Privacy Policy.

The information we collect about you will depend on the product or service you require. If you do not allow us to collect the information we require, we may not be able to provide you with our products or services.

You may interact with us anonymously or provide us with a pseudonym; however, we may not be able to deliver you our products and services if you do so.

### What type of personal information do we collect and hold, and why?

When you request our products and services, and sometimes when you visit our website and complete a web form, we may collect personal information such as your name, address (including the country), email address, phone number and the company you represent (if applicable). We will only collect personal information for the primary purpose of supplying you with our products and services, including after-sales service, and for:

- Promoting our products and services;
- Informing you about special events and offers that might interest you;
- Contacting you to obtain feedback and for other market research activities;
- Helping us to improve our website so we may provide a more engaging experience.

During the life of the product or the service we have provided you, we may collect and hold additional personal information about you. For example, this could include transactions such as a query or complaint you might make, what it involved and how it was resolved, or it may include a change of address or job title.

We may collect financial details for the purpose of providing you with a product or service. This would most commonly include credit card, debit card details or other means of electronic funds transfer. We do not collect financial details from visitors to Corvus Technology Solutions (CTS) website.

Sensitive information is personal information such as ethnicity, race, political affiliations, membership of professional bodies, criminal records and health information. We do not collect sensitive information.

### How do we collect personal information?

We will mostly collect personal information from you directly either in person, via email or telephone. We may also collect personal information electronically when you visit The CTS website (including when you submit a web form). If you participate in a trade show or event, we may collect your information, such as via a business card. We may also obtain your personal information indirectly, such as by you participating in a trade show or event.

We may collect your personal information indirectly from other people or organisations such as our overseas sales representatives. This may be because you have purchased our product from them, you have expressed an interest in our products, or require an after sales service.

### How do we hold personal information?

The information we hold about you will be stored electronically in secure data centres owned by a reputable external cloud service provider located in Singapore and backed up on our local Australian server. The CTS service provider uses a SaaS hosted client relationship management (CRM) software system to securely hold your information in accordance with ISO 27001, one of the world's most widely recognised information security management systems. Only members of CTS and its authorised nominees have access to the information stored.

Information stored on our local backup servers is also protected from misuse, loss, interference and unauthorised access or disclosure in line with internal company policy and procedures. Employees

are bound by internal information security policies, and access to our information systems is controlled through identity authorisation and passwords.

Information that is no longer required for the intended purpose will be routinely destroyed on a periodic basis as determined by company management.

### **Cookies and Google Analytics**

CTS uses a cookie to track visitor activity on our website. This information is used to improve the content of our site as well as to provide visitors with a more relevant overall experience with our organisation and website. CTS never shares cookie information with third parties. If you do not want this site to place a cookie on your browser and track your activity you may leave the site or you may browse the site using privacy mode in your web browser. Our website implements the following Google Analytics Advertising Features: Remarketing with Google Analytics, Google Display Network Impression Reporting, and Google Analytics Demographics and Interest Reporting.

If you fill out a web form on this website your information will be stored in our CRM software system and some amount of your past browsing on this site may be available to our staff to determine your interests, so we may more effectively engage with you and so we may improve our site. However, if you use private browsing as described above, you may provide us your information without making your past browsing activity available to us. If you do not wish for us to have your personal information please do not fill out any of the web forms on this site.

### **Direct Marketing**

By providing us with your personal information you agree to receive direct marketing materials from us.

CTS employs a 100% permission-based email program. If you do not wish for this tracking to occur, you can unsubscribe from our mailings or use private browsing mode to avoid tracking.

### **Who will we disclose your personal information to, and why?**

We may share your personal information between members in CTS and our authorised overseas sales representatives.

We will only disclose the information for the purpose for which it was collected, or a purpose for which you consent or you would reasonably expect us to disclose the information. For example, if we collect

your information to supply you with a product you would reasonably expect us to disclose your information to our freight company so we may deliver goods to you, and to our independent overseas sales representatives (if applicable) so they can follow up that you have received the goods or service to your satisfaction. If you require a refund, we may need to disclose your details to our bank to make an electronic funds transfer.

The data we collect or that is gathered from our website is for the exclusive use of CTS and Related Body Corporate:

- Will never be shared with other websites (e.g. for the purpose of identifying you across unaffiliated websites)
- Will not be shared with anyone outside CTS, our authorised sales representatives, or our CRM and Marketing Automation host service providers,

except for the following circumstances:

- You have consented to do so or where your consent to the disclosure can be reasonably inferred from the circumstances;
- Disclosure to third parties is necessary in achieving the primary purpose for which you disclosed the information;
- To enable us to recover a debt;
- To enable us to deal with anyone interfering or compromising our rights or property;
- Where we are required or authorised by law or where we have a public duty to do so; or
- Where we are otherwise permitted to disclose the information under the Privacy Act.

### **Do we disclose your personal information overseas?**

We may disclose your information overseas to:

- Our SaaS hosted CRM service provider in Singapore for managing our client relations;
- Our SaaS hosted Marketing Automation service provider in Singapore for managing our e-newsletter;
- employees of members in CTS that are located overseas; and
- Our independent sales representatives around the world.

The recipients may be in Asia, Europe, and the USA. A full list of the countries to which we disclose your information is available at the "Contact Us" section of The CTS website:

Members of CTS are incorporated in Australia and will observe the Australian Privacy Principles in relation to personal information disclosed between members of CTS, even if an employee of an CTS

member is located, and receives the information overseas.

Where the recipient of the information is not a member of CTS, but is an overseas subsidiary of CTS Pty Ltd, or is an independent person or business with no link to Australia (other than it sells our product or provides after sales service overseas), Australian Privacy Principle 8.1 will not apply to the disclosure of the information. That is, we cannot guarantee that we have taken reasonable steps to ensure that the overseas recipient will deal with your personal information in accordance with the Australian Privacy Principles. If you provide personal information to us, we may need to disclose your information overseas to an independent business. By providing us with your personal information, you consent to the disclosure. By consenting to the disclosure, you agree that the overseas recipient is not accountable under the Australian Privacy Principles and the Privacy Act, and you will not be able to seek redress under the Privacy Act for an interference of your privacy.

### **Security of Information**

In addition to ensuring that our CRM service provider has adequate security protection of your personal information, information stored by CTS is also protected from misuse, loss, interference and unauthorised access or disclosure in line with internal company policies and procedures. Information that is no longer required for any purpose for which the information may be used or disclosed under the Australian Privacy Principles will be routinely destroyed on a periodic basis as determined by CTS's management.

### **Access to and Correction of Your Personal Information**

You can request access to the personal information we hold about you. You can also ask for corrections to be made. There is no charge for requesting that your information be corrected or for us to correct the information. We are permitted to charge a fee for the reasonable cost for processing your request. We reserve the right to refuse your request for access or correction if we are legally entitled to do so. If we do this, we will write to you setting out our reasons, and provide you with information on how you may complain about our refusal. If you wish to access information to have it corrected, opt-out of further communication or lodge a complaint please do so in writing or email (details below).

### **Changes to the Policy**

This Privacy Policy may change from time to time in accordance with the Australian Privacy Principles. If you are the recipient of our e-newsletter we will notify you if there is a change in the Policy. We will also

post an alert on our website, so please consult our website from time to time for the latest version.

### **Resolving your complaints or concerns**

CTS aims to address any privacy issue or complaint made by an individual promptly, objectively, and confidentially.

Please email our Privacy Officer at [info@corvusts.com](mailto:info@corvusts.com) with your concern or query.

If you make a complaint regarding the privacy of your personal information, we will verify you are authorised to do so and will respond within 30 days.

You are also entitled to make a complaint to the Office of the Australian Information Commissioner if you believe your privacy has been interfered with, by visiting the website at <http://www.oaic.gov.au>