PRIVACY POLICY

ABOUT THIS PRIVACY POLICY

Visionflex has obligations concerning the collection, use, disclosure and storage of personal information. These obligations are set out in the Australian Privacy Principles (**APPs**) under the *Privacy Act 1988* (Cth) (**Privacy Act**), and other applicable State and Territory privacy laws.

In this Privacy Policy, references to "Visionflex", "we", "us" and "our" are to **Visionflex Pty Ltd** (ABN 58 600 815 021) and our "related entity".

Visionflex is related to Visionflex Group Limited (ABN 25 138 897 533), (related entity). This Privacy Policy applies to the collection and handling of your personal information by us and our related entity.

You consent to us collecting, holding, using and disclosing your personal information in accordance with this Privacy Policy.

We will review and update this Privacy Policy from time to time. Any changes to our policy will be published on our website. You may obtain a copy of our current Privacy Policy from our website or by contacting us using the contact details below.

WHAT IS PERSONAL INFORMATION?

"**Personal information**" is information or an opinion about an identified individual or reasonably identifiable individual, whether true or not and whether recorded in material form or not.

WHAT IS SENSITIVE INFORMATION?

"**Sensitive information**" is a sub-category of personal information which includes information about an individual's racial or ethnic origin, political opinions, membership of political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual preferences or practices, criminal record, health information, genetic or certain biometric information.

WHAT PERSONAL INFORMATION DO WE COLLECT AND HOLD?

We collect information about you and your interactions with us. The types of personal information we may collect about you will depend upon the nature of our interaction with you. Specifically, the personal information we collect, and hold may include:

- name;
- address;
- age and/or date of birth;
- gender;
- identification information, such as tax identifier, driver's licence details or passport number
- email address;
- telephone number or mobile number;

- payment details, such as your credit or debit card information;
- educational qualifications;
- financial information, such as bank account details and credit card information;
- occupational and employment details including employment status and any previous work experience;
- information from or in connection with your resume or job application if you apply for a position with us;
- information provided to us via customer surveys;
- photographs or images of you;
- the location from which you have come to our website and the pages you have visited; and
- technical data, which may include IP address, the types of devices you are using to access the Websites, device attributes, browser type, language and operating system.

We collect and record personal information about individuals such as:

- our customers/clients, potential customers/clients and their representatives;
- our suppliers, potential suppliers and their representatives, directors, partners, proprietors and shareholders
- contractors, subcontractors, potential contractors and subcontractors and their representatives in relation to providing goods and services to us;
- our employees past and present, including applications; and
- any other person who comes into contact with us.

HOW DO WE COLLECT PERSONAL INFORMATION?

We may collect personal information directly from you, when you communicate with us through the Websites, by telephone, by e-mail or through a written application. In some circumstances the collection of personal information may be required by law.

Specifically, we may collect your personal information:

- when you use or buy our products or services, including registration or use of a Vision account, and connection via our software to our update server;
- when you provide us, or you offer or apply to supply us, with goods or services;
- when you request information about us, our products, services, programs or events;
- when you provide feedback to us;
- when you visit or fill in a form on the Websites;
- when you submit a job application to us;

- when you contact us by telephone, email, social media, post or in person; and
- when we are otherwise required or authorised by law.

If the personal information we collect includes sensitive information, including health information, we will ask for your consent to collect this sensitive information, unless the law allows us to collect the information without your consent.

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

We collect, hold, use and disclose your personal information for the following purposes:

- to perform our organisational functions and activities in order to operate our business efficiently;
- to identify and communicate with you;
- to enable us to provide you with requested information, products or services, including to honour any warranty claims;
- to help us to manage and enhance the services we provide to you;
- to help us to manage and enhance goods and services we procure from our suppliers and subcontractors;
- to manage and administer any account you hold with us;
- to enable you to access and use our Websites and online services;
- to operate, improve and optimise our Websites and online services and yours and other users' experience;
- to send support and administrative messages, reminders, technical notices, updates, security alerts, and information to you;
- to send marketing and promotional messages to you and other information that has been requested or which may be of interest;
- to process any application submitted by you;
- to respond to any queries or complaints you have made;
- to comply with our legal obligations; and
- to assist government and law enforcement agencies or regulators.

DIRECT MARKETING

We may use your personal information to offer you products and services we believe may interest you, but we will not do so if you tell us not to.

When 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.

TO WHOM DO WE DISCLOSE PERSONAL INFORMATION?

We may disclose your personal information to the following third parties for the purposes listed above:

- Visionflex parent company and other related companies (**Group Entities**);
- trading partners and service providers (of Visionflex and Group Entities);
- to your nominated representatives;
- other organisations or individuals who assist us in providing products, services and programs to you or to administer our business;
- professional service providers and advisors who perform functions on our behalf, such as lawyers and accountants;
- medical providers including medical and rehabilitation practitioners for assessing insurance claims; and
- Government, regulatory authorities or other organisations as required or authorised by law.

We may disclose your personal information to external service providers so that they may perform services for us or on our behalf or to assist us in providing our services or to administer our business.

We may also disclose your personal information to a purchaser or potential purchaser in connection with the sale or potential sale of Visionflex, our business or any of our assets, including in insolvency, but will require the purchaser or potential purchaser to use such personal information consistently with this Privacy Policy.

When we disclose personal information to third parties, we make all reasonable efforts to ensure that we disclose only relevant information and that it is accurate, complete and up to date and that the third party will comply with the Privacy Act in relation to the use, disclosure and storage of your information.

Other permitted disclosures

We may disclose personal information in other circumstances, where the person concerned has consented to the disclosure, or where we are expressly permitted to do so by the Privacy Act or another law. These other disclosures may include where:

- you would reasonably expect the disclosure to occur (for example, quality assurance purposes or training);
- we are authorised or compelled by law to disclose;
- it will prevent or lessen a serious threat to someone's life, health or safety or a threat to public health or safety;
- it is necessary as part of the establishment or defence of a legal claim;
- it is requested by an enforcement agency such as the police; or
- it is a necessary part of an investigation following a complaint or incident.

Other uses and disclosures

We may collect, use and disclose your personal information for other purposes not listed in this Privacy Policy. If we do so, we will make it known to you at the time we collect or use your personal information.

DISCLOSURE OF PERSONAL INFORMATION OUTSIDE AUSTRALIA

We do not disclose your personal information to recipients located outside Australia.

INFORMATION COLLECTED VIA OUR WEBSITES

This Privacy Policy applies to the personal information that Visionflex collects through the following websites:

- https://www.visionflex.com/;
- https://www.vfx-group.com/;
- https://vision.visionflex.com/; and
- other websites owned or operated by Visionflex from time to time (together, the **Websites**).

Cookies

A "cookie" is a small file stored by the web browser software on your computer when you access our Websites. An explanation of cookies can be found on the Office of the Australian Information Commissioner's (**OAIC**) website.

We use session cookies for maintaining contact with a user throughout a web browsing session. Session cookies expire when the browsing session comes to an end or a user shuts down their computer.

We use persistent cookies for statistical purposes and to improve our Websites.

You may accept all cookies, reject all cookies or be notified when a cookie is set. However, if refuse the use of cookies by selecting the appropriate settings on your browser, this may prevent you from using the full functionality of the Websites.

We will deal with any personal information collected by cookies in the same way we handle other personal information under this Privacy Policy.

Google Analytics

Our Websites use Google Analytics, a web analytics service provided by Google Inc. (**Google**). Google Analytics uses cookies to help analyse how users use the Websites. Google Analytics anonymously tracks how users interact with the Websites, including where they came from, what they did on the Websites and whether they completed any transactions on the Websites.

The information generated by the cookie about your use of the Websites (including their IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of compiling reports on the Websites' activity and providing other services relating to the Websites and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate a person's IP address with any other data held by Google.

You can opt out of the collection of information via Google Analytics by downloading the Google Analytics Opt-out browser add-on here.

Clickstream data

When you visit our Websites, a record is made of your visit, including the following information:

- your server address;
- your top level domain name;

- the date and time of access to the site;
- pages accessed and documents downloaded;
- the previous site visited; and
- the type of browser software in use.

We analyse this non-identifiable Website traffic data (including through the use of third party service providers) on an aggregated basis to improve our services and for statistical purposes.

No attempt will be made to identify users or their browsing activities except in the unlikely event of an investigation, where a law enforcement agency may exercise a warrant to inspect the Internet Service Provider's log files.

Third party websites

The Websites may link to other websites which are outside our control, and other websites outside our control may link to the Websites. Whilst we try to ensure that we link only to websites which share our privacy and security standards, once you have left a Website we cannot be responsible for the protection and privacy of any information which you provide on other websites. You should exercise caution and review the privacy statement applicable to the website in question.

SECURITY OF YOUR PERSONAL INFORMATION

We store most information about you in computer systems and databases operated by either us or our external service providers. Some information about you is recorded in paper files that we store securely.

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.

This includes:

- training our staff in how to keep your information safe and secure;
- by being ISO 27001 accredited;
- implementing policies governing the use of end-user mobile devices, including employee devices and procedures for working remotely;
- maintaining cyber liability insurance for an amount of $2,000,000 in aggregate;
- storing your electronic records in secure systems; and
- using trusted contracted service providers (including cloud storage providers).

However, we advise that there are inherent risks in transmitting information across the internet, including the risk that information sent to or from a website may be intercepted, corrupted or modified by third parties. If you have security concerns, or wish to provide personal information by other means (e.g. by telephone or paper), you may contact us using the contact details set out at the bottom of this Privacy Policy.

If the information we store is no longer required by us for any purpose for which it was collected and is no longer required by law to be retained by us, we will destroy or de-identify the information.

HOW CAN I ACCESS OR CORRECT MY PERSONAL INFORMATION?

We have measures in place to ensure the information we hold about you is accurate, complete and up to date.

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

If we refuse to provide you with access to your record or to update your record in the way you request, we will provide you with written reasons.

If we refuse to correct or update your information, you may request that we make a note on your record that you are of the opinion that the information is inaccurate, incomplete, out of date, irrelevant or misleading, as the case may be.

HOW CAN I MAKE A COMPLAINT?

If you have a complaint or concern regarding our handling of your personal information or think that your privacy has been affected, you should contact us using our contact details set out below to raise your complaint or concern.

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 your privacy complaint or concern, you may approach an independent advisor or contact the OAIC. See the OAIC website for more information about how to make a complaint.

CONTACTING US

If you:

- have any questions or would like further information about our Privacy Policy or practices,
- wish to make a complaint about the way we have collected, used, held or disclosed your personal information;
- would like to opt out of receiving our newsletter or information about Visionflex products or services, please contact our Privacy Officer in any of the following ways:
    - **Contact:** Michael Kafrouni (Chief Operating Officer)
    - **Email:** info@visionflex.com
    - **Phone:** 02 8914 4000
    - **Mailing address:** Unit 1, 8 Prosperity Parade, Warriewood NSW 2102, Australia

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