



Privacy Policy

Smart-Ui Group values and respects the privacy of the people we deal with. Smart-Ui Group is committed to protecting your privacy and complying with its obligations under the Privacy Act 1988 (Cth) (**Privacy Act**) and other applicable privacy laws and regulations.

This Privacy Policy (**Policy**) describes how we collect, hold, use and disclose your personal information and how we maintain the quality and security of your personal information.

1. What is personal information?

“Personal information” means any information or opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable. In general terms, this includes information or an opinion that personally identifies you either directly or indirectly.

2. What personal information do we collect?

Personal Information

The personal information we collect about you depends on the nature of your dealings with us or what you choose to share with us. The personal information we collect about you may include:

- Name;
- Mailing or street address;
- Date of Birth;
- Email address;
- Phone number
- Personal information that has been collected by a third party (being a customer of ours) and provided to us for the purpose of providing our services
- Personal information contained in Customer emails and documentation temporarily housed on Smart-Ui Group servers as part of our product offerings

You do not have to provide us with your personal information. Where possible, we will give you the option to interact with us anonymously or by using a pseudonym. However, if you choose to deal with us in this way or choose not to provide us with your personal information, it may hinder or prevent our ability to provide you with our services or otherwise interact with you.

Sensitive Information

While it is not common for us to do so, under certain circumstances, Smart-Ui Group may need to collect sensitive information about you or be granted access to sensitive information by a third party in order to provide our services. This might include any information or opinion about your racial or ethnic origin, political opinions, political association, religious or philosophical beliefs, membership of a trade union or other professional body, sexual preferences, criminal record, or health information.

If we collect your sensitive information, we do so only with your consent (or when provided by a third party - ensuring they have obtained your consent). We will only disclose that information if it is necessary to prevent a serious and imminent threat to life or health or as otherwise required or authorised by law, and we take appropriate measures to protect the security of this information.

3. How do we collect your personal information?

We collect your personal information directly from you when you:

- interact with us over the phone;
- interact with us in person;
- interact with us online;
- participate in surveys or questionnaires;
- attend a Smart-Ui Group event;
- sign up for any marketing material or subscribe to our mailing list; and
- apply for a position with us as an employee, contractor or volunteer.

4. Collecting personal information from third parties

We may also collect your personal information from third parties or through publicly available sources, for example, from customers of ours that have collected your information and provided it to us for the purpose of delivering our services to them or to you.

5. How do we use your personal information?

We use personal information for many purposes in connection with our functions and activities, including the following purposes:

- provide information or services that you (or a third party to whom you initially disclosed the information) request from us;
- deliver to you a more personalised experience and service offering;
- improve the quality of the services we offer;
- internal administrative purposes; and
- marketing and research purposes.

6. Disclosure of personal information to third parties

We may disclose your personal information to third parties in accordance with this Policy in circumstances where you would reasonably expect us to disclose your information. For example, we may disclose your personal information to:

- our third-party service providers as required;
- our marketing providers;
- our professional services advisors;
- our subcontractors (as long as they agree to be bound by the terms of this policy) (collectively **receiving entities**).

7. Transfer of personal information overseas

Some of the receiving entities we disclose personal information to may be based in or have servers located outside of Australia. Our servers are currently based in Australia and North America. We engage developers in India, Ukraine, North America and the Philippines and provide access to test environments for the purpose of that work.

We will only disclose to overseas third parties if:

- we have taken steps that are reasonable in the circumstances to ensure that the overseas recipient does not breach the relevant Australian Privacy Principles; or
- you have given us (or the entities that provided us with, or collected, the information) consent to disclose personal information to that third party; or
- we reasonably believe that the overseas recipient is subject to a law or binding scheme that is, overall, substantially similar to the Australian Privacy Principles and this policy; or
- the disclosure is required or authorised by an Australian law or court/tribunal order.

In some cases, your personal information may be subject to protection under laws in other jurisdictions (for example, Data Processing Agreements under the GDPR regulations that apply in the European Union). Where we are required by law or by agreement to comply with those provisions, we will do so in respect of your personal information.

8. How do we protect your personal information?

Smart-Ui Group will take reasonable steps to ensure that the personal information that we hold about you is kept confidential and secure, including by:

- taking measures to restrict access to only personnel who need that personal information to provide the required services effectively;
- having technological measures in place (for example, anti-virus software, firewalls); and
- ensure that all employees and receiving entities are bound by confidentiality obligations.

Smart-Ui Group will implement appropriate technical and organisational measures to reasonably ensure the security of the data, including protection against a breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access to that data. In assessing the appropriate level of security, Smart-Ui Group will take due account of the industry standards and improvements, the costs of implementation, the nature, scope, context and purpose(s) for holding the personal information and the risks involved in data processing. Smart-Ui Group shall carry out regular checks to ensure that these measures continue to provide an appropriate level of security.

9. Online activity

Cookies

Smart-Ui Group website uses cookies. A cookie is a small file of letters and numbers the website puts on your device if you allow it. These cookies recognise when your device has visited our website(s) before, so we can distinguish you from other users of the website. This improves your experience and the Smart-Ui Group website(s).

We do not use cookies to identify you; just to improve your experience on our website(s). If you do not wish to use the cookies, you can amend the settings on your internet browser so it will not automatically download cookies. However, if you remove or block cookies on your computer, please be aware that your browsing experience and our website's functionality may be affected.

Website analytics

Our website uses tools to help us better understand visitor traffic so that we can improve our services. Although this data is mostly anonymous, it is possible that, under certain circumstances, we may connect it to you.

Direct marketing

We may send you direct marketing communications and information about our services, opportunities, or events that we consider may be of interest to you if you have requested or consented to receive such communications. These communications may be sent in various forms, including mail, SMS and email, in accordance with applicable marketing laws, such as the *Australian Spam Act 2003* (Cth). You consent to us sending you those direct marketing communications by any of those methods. If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.

You may opt out of receiving marketing communications from us at any time by following the instructions to "unsubscribe" set out in the relevant communication or contacting us using the details set out in the "How to contact us" section below.

10. How to access and correct your personal information

Smart-Ui Group will endeavour to keep your personal information accurate, complete and up to date.

If you wish to make a request to access and/or correct the personal information we hold about you, you should make a request by contacting us, and we will usually respond within 2 days. We will deal with such a request by contacting you to confirm your identity and to ensure that the disclosure is not prevented under the terms of the Privacy Act. On confirmation, we will seek your request or amendment in writing and implement the change or provide access in accordance with your request. We will not charge a fee for reasonable requests under this clause.

11. Links to third-party sites

Smart-Ui Group website(s) may contain links to websites operated by third parties. If you access a third-party website through our website(s), personal information may be collected by that third-party website. We make no representations or warranties in relation to the privacy practices of any third-party provider or website, and we are not responsible for the privacy policies or the content of any third-party provider or website. Third-party providers/websites are responsible for informing you about their own privacy practices, and we encourage you to read their privacy policies.

12. Inquiries and complaints

For complaints about how Smart-Ui Group handles, processes or manages your personal information and/or any suspected breach of the Australian Privacy Principles by us, please contact us using the below details. Note that we may require proof of your identity and full details of your request before we can process your complaint.

Please allow up to 5 days for Smart-Ui Group to respond to your complaint. It will not always be possible to resolve a complaint to everyone's satisfaction. If you are not satisfied with Smart-Ui Group's response to a complaint, you have the right to contact the Office of the Australian Information Commissioner (at www.oaic.gov.au/) to lodge a complaint.

13. How to contact us

If you have a question or concern in relation to our handling of your personal information or this Policy, you can contact us for assistance as follows:

Email

info@smartuigroup.com.au

Contact number

1300 781 359

Post

Attention: Smart-Ui Group Privacy Officer

Address: 188 Attunga Rd, Yowie Bay, NSW 2228