



## PRIVACY STATEMENT

# MICIS GROUP PRIVACY POLICY

Updated 30 June 2019

Personal privacy is important to the MiCiS Group of Companies of 1066 Victoria Rd West Ryde NSW 2114 and its affiliates ("MiCiS").

To better protect our clients' privacy, we provide this Privacy Policy to explain our online information practices and the choices our clients may make about the way their information is collected and used. This Privacy Policy addresses only our activities with respect to the personal information that we collect and process on our information systems. This Privacy Policy explains how MiCiS processes information that can be used to directly or indirectly identify an individual (Personal Data) collected through the use of its website and platform.

Our commitment in respect of personal information is to abide by the Privacy Act 1988 (Cth) and any other relevant law.

Any information stored on MiCiS's platform is treated as confidential. All information is stored securely and is accessed by authorised personnel only. MiCiS implements and maintains appropriate technical, security and organisational measures to protect Personal data against unauthorised or unlawful processing and use, and against accidental loss, destruction, damage, theft or disclosure.

### AVAILABILITY OF THIS PRIVACY POLICY

This Privacy Policy is available on our homepage and on every web page where we collect personal information. You can also obtain a copy of this Privacy Policy by contacting us in writing at the address specified below.

### PERSONAL INFORMATION

When we refer to 'personal information' we mean information or an opinion about you, from which you are, or may reasonably be, identified.

This information may include but is not limited to your name, date of birth, driver's licence number, marital status, phone number, email address, address, nationality, employment history, employee numbers, income, assets, and liabilities.

Personal information includes 'sensitive information'. Sensitive information is a subset of personal information which is given additional protection by the Privacy Act and includes information about religious affiliation, philosophical beliefs, political opinion, racial or ethnic origin, convictions, criminal record, medical condition (health), biometric data (e.g. photo in an electronic passport), and sexuality.

Other than information about your affiliation with us, it is not common practice for us to collect sensitive information about you. We will only collect sensitive information about you with your specific consent.

## COLLECTION OF PERSONAL INFORMATION

MiCiS collects personal information from you: when you order or purchase our products or services. We may also collect personal information from you when you request additional information from us or when you voluntarily provide information or suggestions or otherwise participate in interactive online activities.

In some cases, we may receive information about you from our affiliates or business associates. We may also collect information regarding your activities on our websites, including information regarding the navigation paths you take. We may also collect user population, traffic patterns and other information about the online activities of our users on an aggregate basis.

Where reasonable and practical we will collect your personal information only directly from you. However, we will also collect information about you from third parties from a publicly maintained record or from other individuals or companies as authorised by you. From time to time we may also purchase lists containing personal information about individuals from organisations offering such lists for marketing purposes.

If you do not provide the information requested by us, this may hinder us to provision our products or services to you.

If you provide personal information to us about someone else, you must ensure that you are entitled to disclose that information to us and that, without us taking any further steps required by privacy laws, we may collect, use and disclose such information for the purposes described in this Privacy Policy. For example, you should take reasonable steps to ensure the individual concerned is aware of the various matters detailed in this Privacy Policy. The individual must also provide the consents set out in this Privacy Policy in respect of how we will deal with their personal information.

By visiting our website or providing information to MiCiS, you agree that we are entitled to obtain, use and process the information you provided to us to enable us to discharge the service and for other related purposes including:

- Updating and enhancing client records
- Analysis for management purposes
- Carrying out credit check in relation to you
- Statutory returns
- Legal and regulatory compliance
- Crime prevention

We will only hold the data in line with our requirements relating to data retention. We will hold the data for seven years with a review every year. You will have the opportunity to opt out, update or delete data at any point should you need to do so, and details are sent out in this Privacy Policy on how to do that. Some data we may hold for seven years in line with our regulatory requirements in such cases these data cannot be updated or deleted. This data is contracted services and others. Collection of information is basically through cookies, analytics of our website visit, IP addresses, and Internet based advertising.

## USE AND DISCLOSURE OF PERSONAL INFORMATION

Collection of information is used to, and not limited to:

- Inform you of updates to services employed
- Inform you of technology solutions and products
- Seek your feedback and opinions from time to time
- Billing and accounting purposes

MiCiS takes your privacy seriously and use your personal information primarily for the purpose of providing and marketing our products and services. We may from time to time share your personal information with our related bodies corporate and affiliates for the purpose of completing tasks and providing the services to you on our behalf. We use non-identifying and aggregate information about our users primarily to improve our services and may share such information with our advertisers but will not knowingly disclose the identities or contact details of our users when we do so. We have contracts in place that requires such third party to keep your information secure and not to use it for their own direct marketing purposes. When sharing information, MiCiS ensures we are not harming any of your rights and interest.

## DISCLOSURE OF INFORMATION AND DATA TRANSFER TO OVERSEAS RECIPIENTS

We may from time to time transfer personal information outside Australia in accordance with the Privacy Act to countries whose privacy laws do not provide the same level of protection as Australia's privacy laws. For example, we may transfer your personal information to the Asia-Pacific, European Union or the United States of America.

By providing us with your personal information, you consent to us disclosing your information to entities located outside Australia and, when permitted by law to do so, on the basis that we are not required to take such steps as are reasonable in the circumstances to ensure that any overseas recipient complies with Australian privacy laws in relation to your information.

- We may disclose your personal information to staff and related bodies employed overseas to deliver services and solutions to you.
- Data transferred is securely provided to employed contacts/agencies
- We leverage plug-ins, app-connected integrators and softwares to manage data such as ClickDimensions, Dynamics 365, and other marketing automation systems to enhance the experience, as a consequence, some data may be transferred and or stored in cloud-based solutions.
- We may also use cloud storage and IT servers.

Sometimes we are required or authorised by law to disclose your personal information.

Circumstances in which we may disclose your personal information would be to a

Court, Tribunal or law enforcement agency in response to a request or in response to a subpoena or to the Australian Taxation Office. We may also be required to disclose your personal information to the Office of the Australian Information Commissioner (OAIC) as part of our mandatory data breach reporting obligations.

By providing us with your personal information, you consent to us disclosing your information to such entities without obtaining your consent on a case by case basis.

## OUR WEBSITE

Please be aware that this Privacy Policy only addresses the use and disclosure by MiCiS of information MiCiS collects from or about you. Our websites may contain links to other sites and we may engage third party advertisers, suppliers or other service providers, each of which may adhere to their own privacy customs and policies. MiCiS does not control the content or privacy policies of such sites. MiCiS accepts no responsibility or liability for privacy or other issues related to the collection or use of your information by such other sites or third parties.

When you access our website, we use 'cookies' to provide you with a better and more customised service. A 'cookie' is a small text file placed on your computer by our web page server. A cookie can later be retrieved by our webpage servers. Cookies are frequently used on websites and you can choose if and how a cookie will be accepted by configuring your preferences and options in your internet browser.

We use cookies for different purposes such as:

- To allocate a unique number to your internet browsers;
- To customise our website and offers for you;
- For statistical purposes;
- To identify if you have accessed a website; and
- For security purposes.

In addition, it may be necessary for us to collect your IP address (the identifier for your computer when you are using the internet) for your interaction with various parts of our website.

## CONTACTING YOU

As a customer of MiCiS, we may contact you to provide you with information we think you may find useful regarding our products or services. If you decide you do not wish to receive any further marketing information from MiCiS, you may opt-out of receiving future mailings by notifying us in writing at the address below. We may also contact our customers from time to time for administrative purposes, to notify you about important changes to our services or to respond to your enquiries. We will take all reasonable steps to meet your request at the earliest possible opportunity.

## ACCESSING AND CORRECTING YOUR INFORMATION

If you would like to review, update or correct the personal information you provided to us, please contact your nearest MiCiS office or notify us in writing at the address specified below.

MiCiS Head Office  
1066 Victoria Rd West Ryde NSW 2114

Enquiries: [mici@MiCiS.net](mailto:mici@MiCiS.net)

We will provide you with a copy of the personal information we have obtained and stored from or about you upon our receipt of a written and suitably authenticated request from you for such information. We will also correct factual errors in the personal information we have obtained and stored from or about you upon our receipt of a written and suitably authenticated request from you that credibly shows the error. In addition, we will destroy personal information we have obtained and stored from or about you upon our receipt of a written and suitably authenticated request for disposal of that information from you.

To access personal information that we hold about you or to raise a complaint about your personal information we have collected, use the contact details specified below.

MiCiS Group of Companies | 1300 742 082

Please note, there may be situations where we are not required to provide you with access to your personal information. For example, such a situation would be information relating to an existing or anticipated legal proceeding with you, or if your request is vexatious.

An explanation will be provided to you if we deny you access to your personal information we hold.

#### **BUSINESS WITHOUT IDENTIFYING YOU**

In most circumstances it will be necessary for us to identify you in order to successfully do business with you, however, where it is lawful and practicable to do so, we will offer you the opportunity of doing business with us without providing us with personal information. Such a situation would be where you make general inquiries about current promotional offers.

#### **SECURITY OF PERSONAL INFORMATION**

We share your concern over the safety and security of your personal information on the Internet. We have implemented and maintained appropriate technical, security, organisation measure, physical, electronic, and managerial procedures to promote the safety and security of the information we collect online. When you give us personal and sensitive information over the internet (via email, in our contact us form, or other modes), this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot absolutely guarantee that information provided to us will never be disclosed in ways not described above. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites/information, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

#### **FURTHER INFORMATION AND COMPLAINTS**

You may request further information about the way we manage your personal information or lodge a complaint by contacting us at the contact details above.

We will deal with any complaint by investigating the complaint and providing a response to the complainant within a reasonable period, provided that we have all necessary information and have completed any investigation required. In cases where further information, assessment or investigation is required, we will seek to agree on alternative time frames with you.

#### A SPECIAL NOTE ABOUT CHILDREN

Protecting the privacy of young Internet users is especially important to MiCiS. MiCiS will not knowingly collect any personal information from children under the age of 13. If you are under the age of 13, please do not provide us with any personal information. If you are a minor, we encourage you to use our website in conjunction with your parents or guardians.

#### ACCEPTANCE AND MODIFICATION OF THE PRIVACY POLICY

We reserve the right to modify, add, or remove portions of the Privacy Policy at any time. Any modifications made to the Privacy Policy will automatically become effective after posting and your continued use of our services following these changes will constitute your consent to the Privacy Policy, as changed.

This Privacy Policy was last updated on 30th June 2019.