

## **ADVATEL Privacy Policy**

### **1. Introduction**

1.1. This document sets out the Privacy Policy of Vertology Pty Ltd (ACN 615 510 855) trading as AdvaTel (**AdvaTel** or **we**). We respect your right to privacy and we are committed to safeguarding the privacy of our customers, website visitors, program users and others (**you**). We adhere to the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) (**APPs**).

1.2. If you are a citizen of a European Union (**EU**) country or we collect personal data about you from a source in the EU, the EU's General Data Protection Regulation (**GDPR**) applies to us, and we will comply with its requirements. EU based companies that share personal data with us may require that we meet GDPR standards. If you have a query about your rights or our obligations under GDPR, please notify us.

1.3. This Policy sets out how we collect and treat your personal information.

1.4. "Personal information" is information we hold which is identifiable as being about an individual.

### **2. Collection of Personal Information**

2.1. We collect personal information that you or someone on your behalf provides to us directly (either in the course of dealing with us as a customer, or in the course of using our services or programs), enters onto our website, enters into one of our programs, or gives to us in other forms.

2.2. This may include: names; job titles; contact information including addresses, email addresses, phone numbers, fax numbers etc; other information relevant to the customisation of a document on the site; information about goods and services you have ordered; information from enquiries you have made; information and reports about your business; notifications; communication between us; and any other information requested on this site or otherwise required by us or provided by you.

2.3. We may collect additional information at other times, including but not limited to, when you provide feedback, when you provide information about your business affairs, change your contact details, respond to surveys and/or promotions, write testimonials, provide financial, or communicate with our customer support.

2.4 If you sign up for a free trial, you are not required to enter your billing information unless and until you decide to continue with a paid subscription to our services. You will be notified when your free trial is about to expire and asked whether you choose to continue with our services. If you decide to go ahead, we will require you to provide your billing details such as a name, address, email address and financial information corresponding to your selected method of payment.

### **3. How We Collect Personal Information**

3.1. We collect personal information from you in a variety of ways, including when you interact with us electronically or in person, when you access the AdvaTel website, and when we provide our services to you. We may receive personal information from third parties. If we do, we will protect it as set out in this Privacy Policy.

### **4. Use of Personal Information**

4.1. Personal information is only collected in situations where you have consented, where there is a legitimate interest to collect the information, or where the collection of personal information is required in the course of our business operations.

4.2. We may use personal information collected from you to provide you with information,

updates and our services. We may also make you aware of new and additional products, features, services and opportunities available to you. We may use your personal information to manage our business, improve our products and services and better understand your needs.

4.3. If you have any questions or need further information concerning the legal basis on which we collect and use your personal information under the GDPR, please contact us using the details provided in Section 12 'Contact Us'.

## **5. Disclosure of Personal Information**

5.1. We may disclose your personal information to a third party such as any of our employees, partners, insurers, professional advisers, agents, distributors, credit reporting agencies, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this Policy. Personal information is only supplied to a third party when it is required for the management of our business. We do not permit our third party service providers to use the personal information that we share with them for their marketing purposes or for any other purpose than in connection with the services they provide to us.

5.2. We may from time to time need to disclose personal information to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, in the course of a legal proceeding or in response to a law enforcement agency request. We may also share such information if we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of a person, or as otherwise required by law.

5.3. If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our user databases, together with any personal information and non-personal information contained in those databases. This information may be disclosed to a potential purchaser under an agreement to maintain confidentiality. We would seek to only disclose information in good faith and where required by any of the above circumstances.

5.4. By providing us with personal information, you consent to the terms of this Privacy Policy and the types of disclosure covered by this Policy. Where we disclose your personal information to third parties, we will request that the third party follow this Policy regarding handling your personal information.

## **6. International Transfer of Personal Data**

6.1. Information that we collect about individuals in Australia may from time to time be stored, processed in or transferred between parties located in countries outside of Australia, including the United States of America and countries in the EU.

6.2. Personal data we collect about individuals in the EU may be transferred to countries outside the EU. These countries include but are not limited to Australia and the US.

6.3. We have hosting facilities in Australia, EU countries and the US. The European Commission has not made an "adequacy decision" with respect to the data protection laws of Australia. If we transfer an EU citizen's personal data outside the EU, it will be protected by appropriate safeguards, such as standard data protection clauses meeting the requirements of the GDPR.

## **7. Security of Personal Information**

7.1. We are committed to ensuring that the information you provide to us is secure. To prevent unauthorised access or disclosure, we have put in place suitable managerial procedures to safeguard and secure information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

7.2. The transmission and exchange of information is carried out at your own risk. We cannot guarantee the security of any information that you transmit to us or receive from us. Although we

take measures to safeguard against unauthorised disclosures of information, we cannot assure you that personal information that we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

## **8. Access to Personal Information**

8.1. You may request details of personal information that we hold about you in accordance with the APPs and the GDPR. If you would like a copy of the information which we hold about you or believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please email us using the details provided in Section 12 'Contact Us'.

8.2 You have the following rights under the APPs and/or the GDPR:

8.2.1. Right of access by the data subject – the right to access the personal information that we hold or process about you;

8.2.2. Right to rectification – the right to update, correct or amend the personal information that we hold or process about you;

8.2.3. Right to erasure – the right to request remove personal information that we hold about you;

8.2.4. Right to restriction of processing – the right to stop processing all or some of your personal data;

8.2.5. Right to data portability – the right to request a copy of your personal data in electronic format;

8.2.6. Right to object – the right to object to your personal information being used for direct marketing purposes;

8.2.7. Right not to be subject to automated decision making – the right to not be subject to a decision based solely on automated decision making, including profiling, where the decision would have a legal effect on you or produce a similarly significant effect.

8.3. We reserve the right to refuse to provide you with information that we hold about you, in certain circumstances set out in the APPs or GDPR.

## **9. Complaints About Privacy**

9.1. If you have any complaints about our privacy practices, please send details of your complaints to our Data Protection Officer using the details provided in section 12 'Contact Us'. We take complaints very seriously and will respond shortly after receiving written notice of your complaint.

## **10. Changes to Privacy Policy**

10.1. Please be aware that we may change this Privacy Policy in the future. We may modify this Policy at any time, in our sole discretion and all modifications will be effective immediately upon posting the modifications on our website. Please check back from time to time to review our Privacy Policy.

## **11. Website**

11.1. When you come to our website we may collect certain information such as browser type, operating system, website visited immediately before coming to our site, etc. This information is used in an aggregated manner to analyse how people use our site so that we can improve our service.

11.2. We may from time to time use cookies on our website. Cookies are very small files which a website uses to identify you when you come back to the site and to store details about your use of the site. Cookies are not malicious programs that access or damage your computer. Most web browsers automatically accept cookies, but you can choose to reject cookies by changing your

browser settings. However, this may prevent you from taking full advantage of our website.

11.3. Our website may from time to time use cookies to analyse website traffic and help us provide a better website visitor experience. In addition, cookies may be used to serve relevant ads to website visitors through third party services such as Google Adwords. We also partner with third parties to either display advertising on the website or to manage our advertising on other sites. Our third party partners may also use technologies such as cookies to gather information about your activities on our website and other sites in order to suggest advertisements based upon your browsing activities and interests. These ads may appear on this website or other websites you visit.

11.4. Our website may from time to time have links to third party websites not owned or controlled by us. These links are meant for your convenience only. Please be aware that we do not accept claims of liability or responsibility in any way for the privacy practises of other such websites. We encourage our users to be aware when they leave our website and read the privacy statements of each and every website that collects personal identifiable information.

## **12. Contact Us**

12.1. Thank you for reading our Privacy Policy. If you have any questions regarding this Policy, please contact us:

Data Protection Officer

Vertology Pty Ltd

Phone: +61 (0)3 8695 8695

Email: [privacy@advatel.com.au](mailto:privacy@advatel.com.au)

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