

Manage Protect Privacy Policy

Manage Protect considers transparency as a core tenant of our culture as an organisation. As part of this transparency, it is important for you to know what we do with the data that we receive from you, and also how we go about securing its privacy.

The data we collect from you and your customers is considered as "customer data" and "personal information".

Our Privacy Policy is all about your "personal information" – the things we know about you.

If you are an Australian customer, the Policy explains how we collect your personal information, what we do with it, and, most importantly, how it's protected.

Why we collect personal information

We collect personal information from you when it is reasonably necessary for a business purpose.

That means we collect it to supply you with the products you have asked for and to provide you with the best possible service.

Other reasons we collect personal information are to:

- Understand you, and how we can meet your needs now and in the future.
- · Develop or evaluate products.
- Make ads more relevant to you, whether they're about our products or those of other companies.
- · Manage our business.
- · Comply with our legal obligations.

The type of information we collect

Manage Protect collects personal information like your name, address, date of birth, gender, occupation, interests, location, contact details, payment details, financial information, and information about how and where you purchase and use our products.

There are a few different ways we collect this information.

What we collect straight from you

We collect most personal information directly from you. For example, you might fill out a form online or in a store, or give it to one of our representatives on the phone.

Of course, you can choose not to provide your personal information or may just want to deal with us anonymously. If this happens, we may not be able to provide you with the product you've asked for or give you the level of service you expect.



What we collect while you are with us

We also collect personal information during our relationship with you. For example, we may collect personal information:

- · When you pay your bill or purchase products.
- When you use our products, apps or technical support channels.
- What we collect from your online activity

The Manage Protect websites and apps use cookies and other digital identifiers. These include:

- Site performance identifiers: these give us information about how our websites or apps are used. This helps us provide you with a more user-friendly experience.
- Analytics cookies: we use these to gather statistics about our site and apps. For example, they help us monitor how many users are on the site or app, and what sections are most popular.
- Advertising cookies: we use these cookies to improve our understanding of the kind of advertising that may be relevant to your aggregated segment.

It's important to know you can clear cookies or digital identifiers from your device and also disable future use of them by changing the security settings on your web browser. However, doing this might mean that parts of our websites and apps may not work as they should.

What we collect from others

Other people might give us personal information about you. For example, we might be given personal information by other members of your organisation or by your customers.

We will take reasonable steps to make sure you know we have your personal information, how we got it and how we'll handle it.

<u>Insights from statistics and research</u>

We aggregate and process personal information to generate new insights about our network, products and customers, so we can provide you with the best possible service.

Sensitive personal information

When we talk about sensitive information, we mean details about your race, ethnicity, politics, religious or philosophical beliefs, sexual preferences, health, genetics or criminal record.

Generally speaking, we don't keep sensitive information about you.



This kind of information will only be collected with your permission, and we will only use it for the purpose for which you provided it.

Parties we work with

We sometimes team up with other companies to offer products. If you purchase a product that is delivered by one of our partners, we'll give them the personal information they need to provide it and manage their relationship with you. In these circumstances, we have arrangements in place with our partners that limit their use or disclosure of your personal information to these purposes.

Outsourcing

We work with third parties to provide some types of software development, media communications, and marketing communications. They may have access to systems that include your personal information. These companies are subject to strict controls that protect your information from unauthorised use or disclosure, and limit their access to your personal information to the extent necessary to do their job.

Access to personal information from overseas

Your personal information is stored within our CRM, <u>salesforce.com</u>. Salesforce provides their CRM service to us from servers in Singapore and the USA.

Your, and your customers information including are stored as follows:

MPmail (emails): all within Australia.

MParchive (email archive): stored in Australia and New Zealand.

MPweb (web filtering): all within Australia.

MPsoonr (fileshare): all within Australia.

MPexchange (managed exchange): all within Australia.

Outstanding payments

In some circumstances, we may need to refer or sell overdue debts to debt collectors or other companies. If we do this, we'll give them secure access to the personal information they need to handle the debt.

We may also update credit reporting agencies about some types of payment defaults, although we'll always tell you before we do this.

Legal obligations and other privacy exceptions

We give access to personal information where we are permitted or obliged to do so by Australian law. For example, in some circumstances we will use or disclose personal information to react to unlawful activity, serious misconduct, or to reduce or prevent a serious threat to life, health or safety. We are obliged to cooperate with law enforcement bodies in some circumstances. We may disclose personal information, including



information about emails and service use, when we receive an access request or warrant that is authorised under Australian law.

Others

We will only disclose personal information to others if you've given us permission, or if the disclosure relates to the main reason we collected the information and you'd reasonably expect us to do so.

Advertising

We will occasionally communicate with you about our products in the form of our newsletter and promotional emails.

Opting out

We'll make sure that any marketing emails, texts and letters we send you clearly tell you how to opt out, or you can tell our phone staff.

You can opt out of receiving online relevant advertising material at any time by clicking on the symbol displayed on an online ad or by calling us on 1300 657 500.

When you opt out, you can choose to opt out of particular direct marketing, or all direct marketing. Of course, there are some types of marketing we can't control on an individual basis like online ads that are not targeted specifically to you.

Credit related information

Manage Protect uses personal information to assess your credit situation when you apply for services or to become a partner.

After you become a customer, we store the crucial bits of information from the credit report and our own credit assessment. We may continue to use this information to manage credit, and to make sure we're offering and providing the right services to you.

Manage Protect doesn't use credit related information to generate marketing lists

You can get access to credit related information we hold about you, ask us to correct it, or make a complaint, as described elsewhere in this policy. If we agree that our records need to be corrected, and we've previously disclosed that information to a credit reporting agency or other person, we'll tell them about the correction too.

You can ask the credit reporting agencies not to use or disclose the information in their files if you think you have been or are likely to become a victim of fraud.

You can find out more about the credit reporting agencies Manage Protect works with at www.veda.com.au and www.dnb.com.au. Their websites give their contact details and their policies about the management of your personal information.



Security

We're committed to protecting your personal information.

Some of the security measures we use include:

- Firewalls and access logging tools that protect against unauthorised access to your data and our network.
- Secure work environments and workflow systems that prevent unauthorised access and copying of your personal information.
- Secure server and closed network environments.
- Encryption of data in transit.
- · Virus scanning tools.
- Management of access privileges, to ensure that only those who really need it can see your personal information.
- Ongoing training and security reviews.
- These measures are robust, but security risks do change. We will remain vigilant in our efforts to protect your personal information.

How to access your personal information

If you ask us, we will usually give you access to the personal information we hold about you. We will always confirm your identity before giving access to your personal information.

You can ask for access by calling us on 1300 657 500.

There are circumstances under Australian privacy laws where we may not give you access to the personal information we hold about you. For example, we can't give you access if it would unreasonably affect someone else's privacy or if giving you access poses a serious threat to someone's life, health or safety.

There is generally no cost for accessing the personal information we hold about you, unless the request is complex or resource intensive. If there is a charge, it will be reasonable and we will let you know what it is going to be so that you can agree to it before we go ahead.

Quality of personal information

We aim to keep the personal information we hold about you accurate, up-to-date and complete. If you think our records need to be corrected, please call us on 1300 657 500.

Getting in touch

We recognise that your personal information is important to you, so please let us know if you have any questions or concerns about this policy or our practices.

You can get in touch with us by:

Phone: 1300 657 500 or info@manageprotect.com