

Clevertronics Pty Ltd (**Clevertronics, us, we, our**) is committed to providing quality services to you and to handling your Personal Information in accordance with our obligations under the relevant Privacy Acts & Principals in your jurisdiction:

- In Australia: [Privacy Act 1988 \(Cth\), as amended from time to time](#) (**Privacy Act (AU)**) and the 13 Australian Privacy Principles in the Privacy Act (AU)
- In New Zealand: [Privacy Act 2020, as amended from time to time](#) (**Privacy Act (NZ)**) and the 13 Information Privacy Principles in the Privacy Act (NZ)

1. Purpose

This Privacy Policy:

- a) outlines how we collect, hold, use, disclose, and otherwise manage your personal information in compliance with the privacy laws and regulations of Australia and New Zealand (as applicable);
- b) informs you about your rights in relation to your personal information that we manage; and
- c) explains the measures we take to ensure the security of your personal information.

2. What is Personal Information?

In this Privacy Policy, “personal information” has the meaning set out in the Privacy Act (AU) and the Privacy Act (NZ) (as applicable).

In essence, personal information is information or an opinion about an identified, or reasonably identifiable, individual.

3. What personal information do we collect?

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

Generally, the kinds of personal information we collect include:

- a) contact details, including your name, occupation, address, email address, social media handles, phone and fax numbers, and date of birth;
- b) answers you provide to questions we ask and other information in relation to your dealings with Clevertronics, including during your employment or engagement with Clevertronics (as applicable),
- c) if you purchase products or services from us, certain transactional information and financial details to process the transaction;
- d) when you use our websites, website usage information such as the IP address you are using, the name of your Internet service provider, your browser version, the web site that referred you to us and the next website you go to, the pages you request, the date and time of those requests and the country you are in;
- e) where you are applying for a job with Clevertronics, personal information collected in the course of the recruitment process, including your resume (including details of your work history and qualifications), your application form, and background

checks (including where necessary; visa checks, driver licence checks, fit to work medical checks, reference checks, and police checks) as well as sensitive information including criminal record information and/or health information where relevant;

- f) if you are an individual contractor or staff member of Clevertronics, in addition to the information referred to in the above section we may also collect information relevant to your employment or engagement with Clevertronics including tax file number, bank details, feedback from supervisors and training records.

In addition to the types of personal information identified above, Clevertronics may collect other types of personal information as otherwise permitted or required by law.

4. How do we collect and hold your personal information?

Clevertronics collects personal information in a number of ways. The most common ways we collect your personal information are:

- a) directly from you through your use of our website, through the completion of any online forms, when you otherwise engage with us online (including through our social media pages via instant direct messaging, public comments, sharing posts related to Clevertronics or tagging Clevertronics in comments or posts) or through an interaction or exchange you have with us in person or by way of telephone, email or post;
- b) if you are a prospective employee or contractor seeking employment or engagement with Clevertronics, from your current employer, recruitment agency, any referees you provide and any background screening services provider we engage;
- c) from publicly available sources;
- d) from credit reporting agencies;
- e) from our own records about you, or from records about you held by one of our related companies; and
- f) from other third parties.

5. Why do we collect, use, hold and disclose your personal information?

The purposes for which we use, hold and disclose your personal information will depend on the circumstances in which we collect it. Whenever practicable, we endeavour to inform you at the time we collect your personal information as to why we are collecting your personal information, how we intend to use your personal information and to whom we intend to disclose it.

In general, we collect, use, hold and disclose your personal information so that we can do business together and for purposes related to our business operations.

Some of the specific purposes for which we collect, use, hold and disclose personal information include:

- a) to respond to you if you have requested information regarding our products and services (including via our websites, social media pages or via an email or other correspondence you send to us);
- b) to provide goods or services to you or to receive goods or services from you;
- c) to administer and manage the services we use or provide, including charging, billing and collecting debts;
- d) to enable you to participate in any loyalty programs that we conduct;
- e) to improve our products and services and keep you up to date on such improvements;
- f) to assess your application for employment with us or otherwise for the purpose of engaging you as a contractor or consultant;
- g) to understand our customer base and help tailor our products and services;
- h) to allow performance reporting and benchmarking of your business, if applicable;
- i) to contact you (directly or through our service providers) to obtain your feedback, to find out your level of satisfaction with our products and services and for other market research activities;
- j) to verify your identity;
- k) to analyse your use of our website, and personalise and improve your experience on our website using cookies and similar technologies;
- l) to address any issues or complaints that we or you have regarding our relationship;
- m) to contact you regarding the above, including via electronic messaging such as SMS and email, by mail, by phone, by fax or in any other lawful manner; and
- n) any other legal requirements.

If you are employed or engaged by Clevertronics or a contracted labour hire provider, some of the specific purposes for which we collect, use, and disclose personal information are:

- a) processing and assessing employment applications for current and future positions;
- b) to use in the course of your employment or engagement with Clevertronics or a contracted labour hire provider;
- c) unless otherwise required or permitted by law, we will only collect health information about you with your consent and we will only use that information for the primary purpose for which it was collected. In some circumstances, this may include collecting your health information through third parties (e.g. from health care professionals who are treating you).
- d) to conduct pre-employment checks.

We may also use your personal information for purposes related to the above purposes and for which you would reasonably expect us to use your personal information, or where you have consented, or the use is otherwise in accordance with law.

Where personal information is used or disclosed, we take reasonable steps depending on the circumstances to ensure it is relevant to the purpose for which it is to be used or disclosed.

6. Direct marketing

We may use and disclose your personal information for the purpose of direct marketing to you where:

- a) you have consented to us doing so; or
- b) it is otherwise permitted by law.

Direct marketing involves communicating directly with you for the purpose of promoting products or services to you and to provide you with information about special offers. Direct marketing can be delivered by a range of methods including mail, fax, telephone, email or SMS. If you do not wish to receive such communications, you can opt out or unsubscribe from our direct marketing, or change your contact preferences, by contacting us via the contact details set out in section 14 of this Privacy Policy.

We will not use or disclose credit-related personal information for direct marketing purposes except to the extent permitted under the Privacy Act (AU), Spam Act 2003 (AU), Privacy Act (NZ) and Unsolicited Electronic Messages Act 2007 (NZ).

7. What happens if you don't provide personal information?

You have no obligation to provide your personal information to us. However, if you choose not to disclose personal information to us, we may not be able to provide you with products and services that depend on the collection of that information. For the purposes of your employment or engagement with Clevertronics (as applicable), should you choose not to provide us with any personal information that we request, it may affect decisions we may make or actions we may take in respect of your employment or engagement.

8. To whom do we disclose personal information?

We may disclose your personal information to third parties in connection with the purposes for which it was collected, as described in section 5 of this Privacy Policy.

This may include disclosing your personal information to third parties including (but not limited to):

- a) our related companies;
- b) our contractors and other third parties that provide administrative or business management goods and services to us (including suppliers, marketing agencies, data analysis specialists, data processing organisations, billing and debt recovery providers, website and data hosting providers, loyalty program administrators and IT providers);
- c) our accountants, insurers, lawyers, auditors and other professional advisers;
- d) government and regulatory authorities, courts, tribunals and other bodies as required or authorised by law;
- e) in an emergency, to medical and health service providers;
- f) recruitment and labour hire agencies (as required);

- g) any third parties to whom you have directed or permitted us to disclose your personal information (e.g., referees);
- h) in the event that we or our assets may be acquired or considered for acquisition by a third party, that third party and its advisors;
- i) carefully selected third parties with whom we have data sharing arrangements, where personal information is required in the normal course of doing business;
- j) third parties that require the information for law enforcement or to prevent a serious threat to public safety; and
- k) any other party to whom we are authorised or required to disclose personal information by law.

Where we disclose your personal information to third parties, we will take reasonable steps to ensure that such third parties only use your personal information as reasonably required by them for the purpose for which we disclosed it and in a manner consistent with our obligations under the Privacy Act (AU) or the Privacy Act (NZ) (as applicable).

If you post information to public parts of our websites or to our social media pages, you acknowledge that such information (including any personal information) may be accessible and visible to the public. You should use discretion in deciding what personal information you upload to our websites and social media.

9. Overseas disclosure

We may disclose personal information to overseas recipients (including our related companies overseas and overseas service providers) to provide our products and/or services and for administrative, data storage or other business management purposes. The state/territories and countries in which such third parties are located will depend on the circumstances.

Our preference is to store your data in secure local data centres. However, if it becomes necessary to store data overseas, Clevertronics may utilise secure data centres owned by our contracted service providers, including cloud storage providers, which could be situated abroad.

Overseas recipients may have different privacy and data protection standards.

If you are in Australia, before disclosing any personal information to an overseas recipient, Clevertronics takes reasonable steps depending on the circumstances to ensure that:

- a) the overseas recipient complies with the Australian Privacy Principles;
- b) the overseas recipient is bound by a substantially similar privacy scheme unless you consent to the overseas disclosure; or
- c) the disclosure is otherwise required or permitted by law.

If you are in New Zealand, before disclosing any personal information to an overseas recipient, Clevertronics will ensure that it believes on reasonable grounds that:

- a) the overseas recipient complies with the Privacy Act (NZ) or is subject to it;

- b) the overseas recipient is bound (whether legislatively or otherwise) by safeguards that are substantially similar to the Privacy Act (NZ);
- c) you consent to the disclosure, after being expressly informed by Clevertronics that the overseas recipient may not be required to protect the information in a way that, overall, provides comparable safeguards to the Privacy Act (NZ); or
- d) it is otherwise required or permitted by law to disclose your personal information to the overseas recipient.

10. How do we protect your personal information?

Clevertronics will take reasonable steps to keep any personal information we hold about you secure and to protect it from misuse, interference, and loss and from unauthorised access, modification or disclosure. Generally, Clevertronics holds personal information in electronic format. However, we may also hold personal information in hard copy on secure premises accessible only by authorised staff.

Reasonable steps will depend on the circumstances but may include:

- a) **Data Encryption:** Encrypt sensitive personal information, both in transit and at rest, to prevent unauthorised access in case of data breaches.
- b) **Access Controls:** Implement access controls and user authentication mechanisms to ensure that only authorised personnel have access to personal information. Use strong passwords, multi-factor authentication, and role-based access control where appropriate.
- c) **Employee Training:** Provide regular training to employees on data protection policies and procedures, including how to handle personal information securely and how to recognise and respond to security incidents.
- d) **Data Minimisation:** Collect and retain only the personal information that is necessary for the intended purpose. Regularly review and destroy or deidentify unnecessary or outdated data.
- e) **Security Measures:** Implement appropriate technical and organisational security measures to protect personal information, such as firewalls, antivirus software, intrusion detection systems, and security patches.
- f) **Privacy by Design:** Incorporate privacy principles and considerations into the design and development of products, services, and business processes from the outset.
- g) **Third-Party Due Diligence:** Conduct due diligence on third-party service providers and vendors to ensure they have adequate security measures in place to protect personal information.
- h) **Regular Audits and Assessments:** Conduct regular audits and assessments of data protection practices to identify vulnerabilities and areas for improvement.
- i) **Privacy Impact Assessments:** Conduct privacy impact assessments for new projects, products, or services to identify and mitigate privacy risks.
- j) **Incident Response Procedures:** Establish procedures for reporting, investigating, and responding to security incidents, including breaches of personal information.

- k) **Privacy Policy and Notices:** Maintain clear and transparent privacy policies and notices that inform individuals about how their personal information is collected, used, disclosed, and protected.
- l) **Compliance Monitoring:** Monitor compliance with data protection laws and regulations, and regularly review and update policies and procedures to ensure ongoing compliance.

Please notify us immediately by contacting our Privacy Officer (see section 14 of this Privacy Policy) if you become aware of or have reasonable grounds to believe that the security of your personal information may be compromised, including if you have been or are likely to be a victim of fraud.

Clevertronics will destroy or de-identify personal information in circumstances where it is no longer required, unless Clevertronics is otherwise required or authorised by law to retain the information.

11. Links, cookies, and use of Clevertronics websites and applications

Clevertronics websites may contain links to other sites. This Privacy Policy applies to our websites and not any linked sites which are not operated or controlled by Clevertronics. We encourage you to read the privacy policy of each website that collects your personal information.

Clevertronics uses “cookies” and similar technology on its websites and in other technology applications. The use of such technologies is an industry standard and helps us monitor the effectiveness of our advertising and how visitors use our websites/applications. We use such technologies to generate statistics, measure your activity, improve the usefulness of our websites/applications, and to enhance our “customer” experience.

If you prefer not to receive cookies, you can adjust your Internet browser to refuse cookies or to warn you when cookies are being used. However, our websites may not function properly or optimally if cookies have been turned off.

12. How can you access and correct personal information we hold about you?

We take reasonable steps depending on the circumstances to ensure personal information we hold is accurate, up to date, complete, relevant and not misleading. We rely on the accuracy of personal information as provided to us both directly (from you) and indirectly.

You may contact us if the personal information we hold about you is incorrect or to notify us of a change in your personal information (including your contact details). Our contact details are set out in section 14 of this Privacy Policy.

Under the Privacy Act (AU) and Privacy Act (NZ), you have a right to access and seek correction of your personal information that is collected and held by us. If at any time you would like to access or correct the personal information that we hold about you, or

you would like more information on our approach to privacy, please contact our Privacy Officer on the details set out in section 14 below.

We will grant access to the extent required or authorised by the Privacy Act (AU) or Privacy Act (NZ) (as applicable) or other applicable law and take steps reasonable in the circumstances to correct personal information where necessary and appropriate.

To obtain access to your personal information:

- a) you will have to provide proof of identity to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected;
- b) we request that you be reasonably specific about the information you require; and
- c) we may charge you a reasonable fee for providing access in accordance with your request.

We will endeavour to respond to your request to access or correct your personal information within 30 days from your request (if you are in Australia) or 20 working days from your request (if you are in New Zealand). If we refuse your request to access or correct your personal information, we will provide you with written reasons for the refusal and details of complaint mechanisms. We will also take steps reasonable in the circumstance to provide you with access in a manner that meets both your needs and our needs.

13. Privacy complaints

If you have any complaints about our handling of your personal information, or if you believe that we have not complied with this Privacy Policy, the Privacy Act (AU) or the Privacy Act (NZ) (as applicable) or other applicable legislation, please contact our Privacy Officer on the contact details listed at section 14 of this Privacy Policy.

Clevertronics will take any privacy complaint seriously and any complaint will be assessed by an appropriate person with the aim of resolving the complaint in a timely, efficient, and confidential manner. We request that you cooperate with us during this process and provide us with any relevant information that we may need regarding your complaint to enable us to investigate and respond to it.

You will be informed of the outcome of your complaint following completion of our investigation.

If you are not satisfied with the outcome of your complaint, you may contact the Office of the Australian Information Commissioner (if you are located in Australia) or the Office of the Privacy Commissioner (if you are located in New Zealand).

14. How can you contact us?

For further information or enquiries regarding your personal information, to unsubscribe from or opt out of receiving any promotional or marketing communications, and to make requests to update or access your personal information, please contact our Privacy Officer (for both Australia and New Zealand) at:

Attention: Privacy Officer
Clevertronics

1 Caribbean Drive Scoresby VIC 3179 OR privacy@clevertronics.com.au

Or Call +61 (03) 9559 2767

15. Document Control Log

The Company reserves the right to vary or replace this policy or parts of the policy from time to time. This policy replaces any previous versions of related Australia & New Zealand Privacy Policy currently in circulation (whether written or not).