

## Entag Group Pty Ltd – Privacy Policy

**Last updated: May 2024**

Entag Group Pty Ltd (ACN 603 604 066) and its Related Bodies Corporate (having the meaning given in Australia's *Corporations Act 2001* (Cth)) (**Entag, we, us** and **our**) respects your privacy and is committed to protecting it.

We comply with the Australian Privacy Principles and the *Privacy Act 1988* (Cth) (**Privacy Act**), which govern the way private sector organisations collect, use, keep secure and disclose Personal Information. The Privacy Act defines "Personal Information" to mean any information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent or can be reasonably ascertained, from the information or an opinion.

If you have any concerns or questions about the manner in which your Personal Information has been collected, used or disclosed by us, please contact us via the information set out in clause 11 and we will resolve your concern or answer your question.

We recommend that you keep this information for future reference.

### **1. The kinds of Personal Information collected, used and disclosed by Entag**

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We will only use or disclose your Personal Information for the primary purposes for which it was collected, or as consented to by you. At or around the time we collect Personal Information from you, we will endeavour to provide you with a notice which details how we will use and disclose that specific information. We set out some common collection, use and disclosure instances in the table below.

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Purpose	Type of Information	Uses	Disclosures
Sales and enquiries	<ul style="list-style-type: none"> <li><b>Contact information:</b> Such as your name, email address, current postal and residential addresses, phone numbers, business name, ACN or ABN.</li> <li><b>Enquiries:</b> Any information you provide to us as part of your enquiry.</li> <li><b>Transaction sales:</b> Such as billing and account details, and payment card details.</li> <li><b>Customer Service:</b> Information collected in connection with your enquiry, by our customer services department.</li> </ul>	<p>The types of uses we will make of Personal Information collected for this purpose include:</p> <ul style="list-style-type: none"> <li><b>Identity verification:</b> (If required) verifying your identity.</li> <li><b>Services:</b> Providing our services to you including: <ul style="list-style-type: none"> <li>enabling you to use our services;</li> <li>generating tax invoices, dispatch or mail accounts/orders/goods to you;</li> <li>contacting you in relation to deliveries and accounts; and</li> <li>providing customer service functions, including handling customer enquiries and complaints.</li> </ul> </li> <li><b>Marketing:</b> For the purposes set out in the “<i>Marketing services</i>” section.</li> <li><b>General administrative and security use,</b> including: <ul style="list-style-type: none"> <li>protecting Entag’s websites from security threats, fraud or other criminal activities;</li> <li>our administration and management functions;</li> <li>maintaining and developing our services, business systems and infrastructure;</li> <li>in connection with the sale of any part of our business or a company owned by an Entag entity; and</li> <li>providing customer services, and for quality assurance purposes.</li> </ul> </li> </ul>	<p>The types of disclosures we will make of Personal Information collected for this purpose include, without limitation, disclosures to:</p> <ul style="list-style-type: none"> <li>third parties connected with the sales process including ecommerce, payment gateway providers and financial institutions;</li> <li>service providers (including IT service providers and consultants) who assist Entag in providing our services;</li> <li>related bodies corporate of Entag (including related entities);</li> <li>third parties in connection with the sale of any part of our business or a company owned by an Entag’s entity; and</li> <li>as required or authorised by law.</li> </ul>
Marketing services	<ul style="list-style-type: none"> <li><b>Contact information:</b> Such as your name, email address, current postal and residential addresses, workplace, and phone numbers.</li> <li><b>Online forums:</b> Information such as: <ul style="list-style-type: none"> <li>user account information (i.e. username and password and other contact information); and</li> <li>any other information provided to Entag or posted on our forums.</li> </ul> </li> <li><b>Social media activity:</b> Including “likes”, comments posted, any of your feedback, photos posted or uploaded and other information</li> </ul>	<p>We may use Personal Information collected for this purpose for:</p> <ul style="list-style-type: none"> <li><b>General marketing and consumer analytics,</b> including <ul style="list-style-type: none"> <li>aggregating with other information for marketing and consumer analytics purposes;</li> <li>offering you updates on services, events or information that may be of interest to you;</li> <li>our marketing and promotional activities (including by email and text message) such as our email alerts, product awareness information and newsletters; and</li> </ul> </li> </ul>	<p>We may disclose your Personal Information to:</p> <ul style="list-style-type: none"> <li>third parties connected with the marketing process who assist us in providing our services to you, including market researchers and others; and</li> <li>the parties listed in the Disclosure column for “<i>Sales and enquiries</i>”.</li> </ul>

Purpose	Type of Information	Uses	Disclosures
	pertaining to your social media activities which concern, or relate, to Entag.	<ul style="list-style-type: none"> <li>for the Uses detailed in the “<i>Sales and enquiries</i>” section.</li> <li><b>Online accounts or social media:</b> If you create an account with Entag or participate in our social media platforms (such as Facebook, X, Instagram, LinkedIn and YouTube) and you provide us your Personal Information, we will use it for: <ul style="list-style-type: none"> <li>customer service related contact;</li> <li>adding account holders to the marketing database;</li> <li>responding to social media messages you send us; and</li> <li>fulfilling social media platform rules.</li> </ul> </li> </ul>	
Employees and contractors	<ul style="list-style-type: none"> <li><b>Contact information:</b> Such as your name, email address, current postal and residential addresses, phone numbers, next of kin contact details.</li> <li><b>Employee record information.</b></li> <li><b>Identifying information:</b> Such as your photo, passport and residency details, date of birth.</li> <li><b>CV, resume or application related information:</b> Such as the details provided in your resume or CV, your eligibility to work in Australia, your education, previous employment details, professional memberships or trade qualifications.</li> <li><b>Tax, superannuation and payroll information:</b> Such as your Tax File Number and ATO Declaration, superannuation details and financial institution details.</li> <li><b>Background check information:</b> Information obtained from you or third parties to perform background checks.</li> <li><b>Performance related information:</b> Pre-employment testing and other information collected by Entag’s systems in the course of your employment or engagement with Entag.</li> <li><b>Information collected from referees.</b></li> <li><b>Security information:</b> Such as CCTV footage and photographs taken on our premises.</li> </ul>	<p>We may use Personal Information collected for this purpose for:</p> <ul style="list-style-type: none"> <li><b>Processing payments or wages, and remitting tax and superannuation;</b></li> <li><b>Background checks:</b> Assessing candidate suitability for role or engagement, including by obtaining: <ul style="list-style-type: none"> <li>verification of your identity and age;</li> <li>criminal history background checks and social media checks (including publicly available information including Facebook, X, Instagram, YouTube);</li> <li>confirmation of your eligibility to work in Australia;</li> <li>confirmation of your education and qualifications;</li> <li>confirmation of your previous employment;</li> <li>consideration regarding medical leave.</li> </ul> </li> <li><b>Administration and performance monitoring use:</b> Including for the following purposes, regardless of whether the employment or contractor relationship is prospective, current or past: <ul style="list-style-type: none"> <li>dealings related to the employer/employee relationship or the contractor/principal relationship (as the case may be);</li> </ul> </li> </ul>	<p>We may disclose your Personal Information to:</p> <ul style="list-style-type: none"> <li>recruitment agents used in connection with your application with us;</li> <li>third party referees nominated by you in connection with an application made to Entag;</li> <li>third party parties in connection with obtaining any background checks, pre-employment screening;</li> <li>our contractors, agents and third party providers who undertake IT, payroll and employee entitlement services on our behalf;</li> <li>our channel partners including Telstra;</li> <li>financial institutions for payroll purposes;</li> <li>relevant superannuation companies;</li> <li>government agencies, including but not limited to the Australian Taxation Office, Centrelink and Department of Human Services;</li> <li>relevant Worker’s Compensation organisation (e.g. WorkCover Queensland etc);</li> </ul>

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Purpose	Type of Information	Uses	Disclosures
		<ul style="list-style-type: none"> <li>– monitoring systems, performance, time usage, and internet usage; and</li> <li>– administration and management of Entag.</li> </ul>	<ul style="list-style-type: none"> <li>• third parties in connection with the sale of any part of Entag's business or a company owned by Entag; and</li> <li>• as required or authorised by law.</li> </ul>
Credit information	<ul style="list-style-type: none"> <li>• <b>Contact and identifying information:</b> Such as: <ul style="list-style-type: none"> <li>– your name, email address, current postal and residential addresses, phone numbers; and</li> <li>– bank account (including bank statements), credit or debit card details.</li> </ul> </li> </ul>	<p>For full details relating the use of credit information, please refer to our Credit Reporting Policy.</p> <p>In summary, we may use Personal Information collected for this purpose for:</p> <ul style="list-style-type: none"> <li>• <b>Purchases of products and services from Entag:</b> Payment processing, including charging, refunds (if applicable), credit card authorisation, verification and debt collection.</li> <li>• <b>Third party payments:</b> On your behalf, the processing of any payments or refunds with third parties, if applicable.</li> <li>• <b>Online accounts:</b> If you create an account with Entag and you provide us your Personal Information, we will use it for: <ul style="list-style-type: none"> <li>– processing of account transactions;</li> <li>– customer service related contact;</li> <li>– general administrative and security use as detailed in the Uses column for "Sales and enquiries".</li> </ul> </li> </ul>	<p>For full details relating to disclosures of credit information, please refer to our Credit Reporting Policy.</p> <p>In summary, we may disclose this type of Personal Information to:</p> <ul style="list-style-type: none"> <li>• our contractors, agents and third party providers who undertake IT, billing and credit services on our behalf;</li> <li>• third parties, such as external debt recovery agents, court or other entities to whom we are required by law to disclose Personal Information; and</li> <li>• the parties listed in the Disclosure column for "Sales and enquiries".</li> </ul>

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## **2. How Entag collects and holds Personal Information**

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### **2.1 Collection generally**

As much as possible or unless provided otherwise in this Privacy Policy or a notification, we will collect your Personal Information directly from you. When you engage in certain activities, such as filling out a survey or sending us feedback, we may ask you to provide certain information. It is completely optional for you to engage in these activities.

Depending upon the reason for requiring the information, some of the information we ask you to provide may be identified as mandatory or voluntary. If you do not provide the mandatory information or any other information we require in order for us to provide our services to you, we may be unable to provide our services to you in an effective manner, or at all.

### **2.2 Other collection types**

We may also collect Personal Information about you from other sources and third parties. Some examples of these alternative collection events are:

- (a) when we collect Personal Information about you from third parties; or
- (b) when we collect Personal Information about you from publicly available sources including but not limited to, court judgments, directorship and bankruptcy searches, Australia Post, White Pages directory, and social media platforms (such as Facebook, X, Google, Instagram etc).

### **2.3 Notification of collection**

If we collect details about you from someone else, we will, whenever reasonably possible and unless special circumstances apply, make you aware that we have done this and why, including as described in clauses 2.3(a) to 2.3(c). Generally speaking, we will not tell you when we collect Personal Information about you in the following circumstances:

- (a) where information is collected from any personal referee you have listed on any application form (including any employment application) with Entag;
- (b) where information is collected from publicly available sources including but not limited to court judgments, directorship and bankruptcy searches, social media platforms (such as Facebook, X, Google, Instagram etc); or
- (c) as otherwise required or authorised by law.

### **2.4 Unsolicited Personal Information**

In the event we collect Personal Information from you, or a third party, in circumstances where we have not requested or solicited that information (known as unsolicited information), and it is determined by Entag (in its absolute discretion) that the Personal Information is not required, we will destroy the information or ensure that the information is de-identified.

In the event that the unsolicited personal information collected is in relation to potential future employment with Entag (such as your CV, resume or candidacy related information), and we determine we may consider you for potential future employment, we may keep that information in our human resource records.

### **2.5 How we hold your Personal Information**

Once we collect your Personal Information, we will either hold it securely and store it on infrastructure owned or controlled by us or with a third party service provider who have taken

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reasonable steps to ensure they comply with the Privacy Act. We provide some more general information on our security measures in clause 9.

## 2.6 Cookies and IP addresses

If you use our website, we may utilise “cookies” which enable us to monitor traffic patterns, trends and to serve you more efficiently if you revisit our website. In most cases, a cookie does not identify you personally but may identify your internet service provider or computer.

We may gather your IP address as part of our business activities and to assist with any operational difficulties or support issues with our services. This information does not identify you personally.

However, in some cases, cookies may enable us to aggregate certain information with other Personal Information we collect and hold about you. Entag extends the same privacy protection as detailed in this Privacy Policy to your Personal Information, whether gathered via cookies or from other sources.

You can set your browser to notify you when you receive a cookie and this will provide you with an opportunity to either accept or reject it in each instance. However, if you disable cookies, you may not be able to access certain areas of our websites or take advantage of the improved website experience offered by cookies.

## 3. Uses and discloses of Personal Information

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### 3.1 Use and disclose details

We provide a detailed list at clause 2 of some common uses and disclosures we make regarding the Personal Information we collect.

### 3.2 Other uses and disclosures

We may also use or disclose your Personal Information and in doing so we are not required to seek your additional consent:

- (a) when it is disclosed or used for a purpose related to the primary purposes of collection detailed above and you would reasonably expect your Personal Information to be used or disclosed for such a purpose;
- (b) if we reasonably believe that the use or disclosure is necessary to lessen or prevent a serious or imminent threat to an individual's life, health or safety, or to lessen or prevent a threat to public health or safety;
- (c) if we have reason to suspect that unlawful activity has been, or is being, engaged in; or
- (d) if it is required or authorised by law.

### 3.3 Use and disclosure procedures

In the event we propose to use or disclose such Personal Information other than for reasons set out in the table at clause 2 or as otherwise outlined in this Privacy Policy, we will first notify you or seek your consent prior to such disclosure or use.

Your Personal Information is disclosed to these organisations or parties only in relation to the services we provide to you or for a purpose permitted by this Privacy Policy.

We take such steps as are reasonable to ensure that these organisations or parties are aware of the provisions of this Privacy Policy in relation to your Personal Information.

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## 3.4 Communications opt-out

If you have received communications from us and you no longer wish to receive those sorts of communications, you should contact us via the details set out in clause 11 and we will ensure the relevant communication ceases. Any other use or disclosure we make of your Personal Information will only be as required or authorised by law or as permitted by this Privacy Policy or otherwise with your consent.

## 4. Sensitive information

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### 4.1 Sensitive information generally

Sensitive information is a subset of Personal Information. It means information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political organisation, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information about an individual, genetic information, biometric information that is to be used for the purpose of automated biometric verification or biometric identification or biometric templates.

### 4.2 Collection and use of sensitive information

In general, we attempt to limit the collection of sensitive information we may collect from you, but depending on the uses you make of our services this may not always be possible and we may collect sensitive information from you in order to carry out the services provided to you. However, we do not collect sensitive information from you without your consent.

The type of sensitive information we may collect about you is dependent on the services provided to you by Entag and will be limited to the purpose(s) for which it is collected. We set out some types of sensitive information we may collect about you in the "*Employees and contractors*" section of the table at clause 2.

We do not use sensitive information to send you Direct Marketing Communications (as set out in clause 5) without your express consent.

### 4.3 Consent

We may collect other types of sensitive information where you have consented and agree to the collection of such information. Generally speaking, we will obtain this type of consent from you at (or around) the point in time in which we collect the information.

## 5. Direct marketing

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### 5.1 Express informed consent

You give your express and informed consent to us using your Personal Information set out in:

- (a) the "*Sales and enquiries*" section of the table at clause 2; and
- (b) the "*Marketing services*" section of the table at clause 2,

to provide you with information and to tell you about our services or events or any other direct marketing activity (including third party products, services, and events) which we consider may be of interest to you, whether by post, email, SMS, messaging applications and telephone (**Direct Marketing Communications**).

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### 5.2 **Inferred consent and reasonable expectations of direct marketing**

Without limiting clause 5.1, if you have provided inferred or implied consent (e.g. not opting out where an opt-out opportunity has been provided to you) or if it is within your reasonable expectation that we send you Direct Marketing Communications given the transaction or communication you have had with us, then we may also use your Personal Information for the purpose of sending you Direct Marketing Communications which we consider may be of interest to you.

### 5.3 **Opt-out**

If at any time you do not wish to receive any further Direct Marketing Communications from us or others under this clause 5, you may ask us not to send you any further information about services and not to disclose your information to other organisations for that purpose. You may do this at any time by using the “unsubscribe” facility included in the Direct Marketing Communication or by contacting us via the details set out in clause 11.

## 6. **Credit Information and our Credit Reporting Policy**

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### 6.1 **Credit information generally**

The Privacy Act contains provisions regarding the use and disclosure of credit information, which applies in relation to the provision of both consumer credit and commercial credit.

### 6.2 **Credit information and Entag**

As we provide terms of payment of accounts which are greater than seven days, we are considered a credit provider under the Privacy Act in relation to any credit we may provide you (in relation to the payment of your account with us).

We use credit related information for the purposes set out in the “Credit information” section of the table at clause 2 and our Credit Reporting Policy, which includes but is not limited to using the information for our own internal assessment of your credit worthiness.

### 6.3 **Storage and access**

We will store any credit information you provide us, or which we obtain about you, with any other Personal Information we may hold about you.

You may request to access or correct your credit information in accordance with clause 11 and the provisions of our Credit Reporting Policy.

### 6.4 **Complaints**

Please see clause 11 and the provisions of our Credit Reporting Policy if you wish to make a complaint in relation to our handling of your credit information.

### 6.5 **Our Credit Reporting Policy**

For further information as to the manner in which we collect, use, store and disclose credit information, please see our Credit Reporting Policy at [www.entag.com.au](http://www.entag.com.au)

## 7. **Anonymity and pseudo-anonymity**

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Due to the nature of the services Entag provides to you, it is impractical (and, in some cases, impossible) for us to deal with you on an anonymous basis or through use of a pseudonym.



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## **8. Cross Border Disclosure**

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### **8.1 Cross border disclosures**

Some Personal Information collected and held by Entag, such as your user name and email address, may be disclosed to, and held at, a destination outside Australia, including but not limited to **the United States of America, European Union, and India**, where we utilise third party service providers to assist us with providing our services to you. Personal Information may also be processed by staff or by other third parties operating outside Australia who work for us or for one of our suppliers, agents, partners or related companies.

As we use service providers and platforms which can be accessed from various countries via an Internet connection, it is not always practicable to know where your information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed above.

In addition, we may utilise overseas IT services (including software, platforms and infrastructure), such as data storage facilities or other IT infrastructure. In such cases, we may own or control such overseas infrastructure or we may have entered into contractual arrangements with third party service providers to assist us with providing our services to you.

### **8.2 Provision of informed consent**

By submitting your Personal Information to Entag, you expressly agree and consent to the disclosure, transfer, storage or processing of your Personal Information outside of Australia. In providing this consent, you understand and acknowledge that countries outside Australia do not always have the same privacy protection obligations as Australia in relation to Personal Information. However, we will take steps to ensure that your information is used by third parties securely and in accordance with the terms of this Privacy Policy.

The Privacy Act requires us to take such steps as are reasonable in the circumstances to ensure that any recipients of your Personal Information outside of Australia do not breach the privacy principles contained within the Privacy Act. By providing your consent, under the Privacy Act, we are not required to take such steps as may be reasonable in the circumstances. However, despite this, we acknowledge the importance of protecting Personal Information and have taken reasonable steps to ensure that your information is used by third parties securely and in accordance with the terms of this Privacy Policy.

### **8.3 If you do not consent**

If you do not agree to the disclosure of your Personal Information outside Australia by Entag, you should (after being informed of the cross border disclosure) tell Entag that you do not consent. To do this, either elect not to submit the Personal Information to Entag, or contact us via the details set out in clause 11.

## **9. Data security and quality**

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### **9.1 Entag's security generally**

We have taken steps to help secure and protect your Personal Information from unauthorised access, use, disclosure, alteration, or destruction. You will appreciate, however, that we cannot guarantee the security of all transmissions or Personal Information, especially where human error is involved or malicious activity by a third party.

Notwithstanding the above, we will take reasonable steps to:

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- (a) make sure that the Personal Information we collect, use or disclose in relation to you is accurate, complete and up to date;
- (b) protect your Personal Information from misuse, loss, unauthorised access, modification or disclosure, both physically and through computer security methods; and
- (c) destroy or permanently de-identify your Personal Information if it is no longer needed for the purposes for which it was collected.

## 9.2 Accuracy

The accuracy of Personal Information depends largely on the information you provide to us, so we recommend that you:

- (a) let us know if there are any errors in your Personal Information; and
- (b) keep us up-to-date with changes to your Personal Information (such as your name or address).

We provide information about how you can access and correct your information in clause 10.

## 10. Access to and correction of your Personal Information

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You are entitled to have access to any Personal Information relating to you which we hold, except in some exceptional circumstances provided by law (including the Privacy Act). You are also entitled to edit and correct such information if the information is inaccurate, out of date, incomplete, irrelevant or misleading.

If you would like access to or correct any records of Personal Information we have about you, you are able to access and update that information (subject to the above) by contacting us via the details set out in clause 11.

## 11. Resolving privacy complaints

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### 11.1 Complaints generally

We have put in place an effective mechanism and procedure to resolve privacy complaints. We will ensure that all complaints are dealt with in a reasonably appropriate timeframe so that any decision (if any decision is required to be made) is made expeditiously and in a manner that does not compromise the integrity or quality of any such decision.

### 11.2 Contacting Entag regarding complaints

If you have any concerns, questions or complaints about the manner in which we have collected, used or disclosed and stored your Personal Information, please contact us by email at [info@entag.com.au](mailto:info@entag.com.au).

### 11.3 Steps we take to resolve a complaint

In order to resolve a complaint, we:

- (a) will liaise with you to identify and define the nature and cause of the complaint;
- (b) may request that you provide the details of the complaint in writing;

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- (c) will keep you informed of the likely time within which we will respond to your complaint; and
- (d) will inform you of the legislative basis (if any) of our decision in resolving such complaint.

### 11.4 Register of complaints

We will keep a record of the complaint and any action taken in a Register of Complaints.

## 12. Consent, modifications and updates

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### 12.1 Interaction of this Privacy Policy with contracts

This Privacy Policy is a compliance document prescribed by law, rather than a legal contract between two or more persons. However, certain contracts may incorporate all, or part, of this Privacy Policy into the terms of that contract. In such instances, Entag may incorporate the terms of this policy such that:

- (a) certain clauses or paragraphs in this policy are incorporated into that contract, but in such a way that they do not give rise to contractual obligations for Entag, but do create contractual obligations on the other party to the contract; and
- (b) the consents provided in this policy become contractual terms provided by the other party to the contract.

### 12.2 Acknowledgement

By using our website, purchasing a product or service from Entag, or becoming an employee or contractor of Entag, where you have been provided with a copy of our Privacy Policy or had a copy of our Privacy Policy reasonably available to you, you are acknowledging and agreeing:

- (a) to provide the consents given by you in this Privacy Policy; and
- (b) that you have been informed of all of the matters in this Privacy Policy.

### 12.3 Modifications and updates

We reserve the right to modify our Privacy Policy as required by our business needs, from time to time. We will take reasonable steps to notify you of such changes (whether by direct communication or by posting a notice on our website). If you do not agree to our continued use of your personal information due to the changes in our Privacy Policy, please cease providing us with your Personal Information and contact us via the details set out in clause 11.