

Privacy Policy

EcoGraf Limited (EcoGraf) recognises the importance of your privacy and understands that the security of your personal information is important to you. We are committed to protecting the personal information you provide to us.

This Privacy Policy explains how EcoGraf manages the personal information that we collect, hold, use and disclose and how to contact us if you have any queries about our management of your personal information. We recognise that your privacy is very important to you and that you have a right to control your personal information. We know that providing personal information is an act of trust. We value and take your trust very seriously. Unless you give us explicit consent to act otherwise, the following policy will govern how EcoGraf handles your personal information and safeguards your privacy. EcoGraf is committed to ensuring the protection of your personal information and giving you options regarding who can use your personal information and how it can be used. Our privacy policy is intended to represent industry best practice and comply fully with the Privacy Act 1988 (**Privacy Act**). In addition to the Privacy Act, the General Data Protection Regulation (**GDPR**) is also applicable and individuals located in the European Union (**EU**) may have additional rights under the GDPR.

This Privacy Policy applies to all the members of the EcoGraf group of companies.

What personal information does EcoGraf collect?

In the course of our business, EcoGraf may collect personal information about you that is necessary for us to perform our functions and activities. EcoGraf will only collect personal information about you by lawful and fair means and not in an unreasonably intrusive manner.

The types of personal information we may collect and hold may vary depending on the nature of our interaction with you and may include:

- identifying and contact information (such as name, age, address and telephone phone number);
- bank account and payment details; and
- identifying and contact information about next of kin.

EcoGraf may collect personal information about:

- third parties providing a service to EcoGraf;
- the shareholders of EcoGraf; and
- employees and contractors of EcoGraf.

How does EcoGraf collect personal information?

EcoGraf may collect your personal information in a number of ways including through application forms, job orders and correspondence (written and verbal)

EcoGraf typically collects your personal information directly from you. On some occasions, EcoGraf may collect your personal information from third parties such as recruitment agencies.

For what purposes does EcoGraf collect, hold, use and disclose your personal information?

The Privacy Act generally requires EcoGraf to use personal information only for the primary purpose for which it is collected, or for secondary purposes which are related (or directly related in the case of sensitive information) to the primary purpose.

In general, EcoGraf collects, holds, uses and discloses personal information for the following purposes:

- to carry out our functions and activities;
- to manage our relationship with you (including if you are a service provider, shareholder or employee) and to contact you for follow up purposes;
- to verify and update personal information held by us;
- to recruit personnel;
- to review, develop and improve our functions and activities and business processes;
- to comply with legal or regulatory obligations; and
- for other purposes required or authorised by or under law, including purposes for which you have provided your express or implied consent.

Our functions and activities may change from time to time.

If you provide your email address, telephone and/or mobile phone number, you also consent to EcoGraf using your email address, telephone and/or mobile phone number to contact you (including by telephone call, SMS or email) for any of the above purposes.

To whom may EcoGraf disclose your personal information?

In order to carry out the above activities, EcoGraf may disclose your personal information to:

- persons or organisations engaged by EcoGraf to assist EcoGraf in carrying out the above purposes, such as registry services, data storage providers, IT support providers and professional advisors;
- regulatory authorities; and
- parties involved in a prospective or actual transfer of our assets or business.

In addition, members of the EcoGraf group of companies may share your personal information with each other and their related bodies corporate so that EcoGraf may adopt an integrated approach, provide better service and ensure seamless business operations for those with whom it interacts.

Our use of cookies

Cookies are pieces of information that a website transfers to your computer's hard disk for record keeping purposes. Most web browsers are set to accept cookies. EcoGraf uses cookies to make your use of our website and services as convenient as possible. Cookies in and of themselves do not personally identify users, although they do identify a user's browser. Cookies are useful to estimate our number of members and determine overall traffic patterns through our website.

We may use cookies, web beacons or similar technologies to collect de-identified information about your visits to our website at www.ecograf.com.au (**Website**) for the purpose of improving your experience browsing our Website. For example, when you visit our Website we may collect your server address, domain name, operating system, browser type, pages accessed, documents downloaded, previous visits, referring website, and visit date and time. You may set your browser to disable cookies but some parts of our Website may not function properly if cookies are disabled.

What happens if you don't provide EcoGraf with your personal information?

If you do not provide personal information requested of you to EcoGraf, we may be unable to provide the products and services you or others request of us.

How does EcoGraf hold your personal information and manage the data quality and security of your personal information?

EcoGraf stores your personal information on servers located in Australia with access only available by password.

To the extent required by the Privacy Act, EcoGraf will take reasonable steps to:

- make sure that the personal information that we collect, hold, use and disclose is accurate, complete and up to date; and
- protect the personal information that we hold from misuse, interference, loss, unauthorised access, modification or disclosure.

EcoGraf will take reasonable steps to ensure that personal information that is held which is no longer required, including under any contractual or legal requirement, is destroyed or de-identified in a secure manner.

Accessing and updating your information and how to contact us

Subject to some exceptions in the Privacy Act, you have the right to seek access to and update the personal information we hold about you. We handle requests for access to your personal information in accordance with the Australian Privacy Principles (**APP**). If you make an access request, we will ask you to verify your identity. We may charge a fee to cover the costs of meeting your request.

We will deal with all requests for access to personal information as quickly as possible. In some cases, consistent with the APP, we may refuse to give you access to personal information we hold about you. This includes, without limitation, circumstances where giving you access:

- would be unlawful;
- would have an unreasonable impact on other people's privacy;
- would be likely to prejudice the taking of appropriate action in relation to suspected unlawful activity or misconduct of a serious nature, that relates to our functions or activities; or
- would be likely to prejudice enforcement related activities carried out by, or for, an enforcement body.

If we refuse to give you access, we will provide you with reasons for our refusal. Generally, if you request us to do so we will amend any personal information we hold about you which is inaccurate, incomplete or out of date.

Whilst we will take all reasonable steps to ensure that the personal information you provide us is accurate and up to date, we request that you keep your information as current as possible so that we may continue to improve our service to you. You may ask us to correct or remove information which you think is inaccurate. If you would like to amend any of your details or the information you have provided to us, you can contact us using our contact details provided in this policy.

If you would like to seek access to personal information we hold about you, or if you have any questions or complaints about how we collect, use, disclose, manage or store your personal information, you can contact us via the details set out below.

Does EcoGraf transfer personal information overseas?

EcoGraf has a number of related bodies corporate overseas and if necessary and within the guidelines set out in this policy, EcoGraf may disclose personal information to those related bodies corporate. Overseas service providers may also be utilised to process or back up EcoGraf information and as a result, we may transfer your personal information to our overseas facilities for storage. However, this does not change any of our commitments to safeguard your privacy.

General Data Protection Regulation (GDPR)

We welcome the GDPR of the European Union (EU) as an important step forward in streamlining data protection globally and we will comply with the data handling regime laid out in the GDPR in respect of any personal information of data subjects in the EU that we may obtain.

GDPR rights

The requirements of the GDPR are broadly similar to those set out in the Privacy Act and include the following rights:

- you are entitled to request details of the information that we hold about you and how we process it. For EU residents, we will provide this information for no fee;
- you may also have a right to:
 - have that information rectified or deleted;
 - restrict our processing of that information;
 - stop unauthorised transfers of your personal information to a third party;
 - in some circumstances, have that information transferred to another organisation; and
 - lodge a complaint in relation to our processing of your personal information with a local supervisory authority; and
 - where we rely upon your consent as our legal basis for collecting and processing your data, you may withdraw that consent at any time.

If you object to the processing of your personal information, or if you have provided your consent to processing and you later choose to withdraw it, we will respect that choice in accordance with our legal obligations. However, please be aware that:

- such objection or withdrawal of consent could mean that we are unable to provide our services to you, and could unduly prevent us from legitimately providing our services to other clients subject to appropriate confidentiality protections; and
- even after you have chosen to withdraw your consent, we may be able to continue to keep and process your personal information to the extent required or otherwise permitted by law, in particular:
 - to pursue our legitimate interests in a way that might reasonably be expected as part of running our business and which does not materially impact on your rights, freedoms or interests; and
 - in exercising and defending our legal rights and meeting our legal and regulatory obligations.

Storage and processing by third parties

Data that we collect about you may be stored or otherwise processed by third party services with data centres based outside the EU, including (but not limited to) Google Analytics, Microsoft Azure, Amazon Web Services, Apple and related online relationship management tools. These third parties are an ordinary consequence of accessing the internet that cannot be easily avoided. EcoGraf does not consider that the collection of your data by the abovementioned third parties materially impacts your rights, freedom or interests and any information collected by these third parties will be used in accordance with their own respective privacy policies.

We require all third parties that act as "data processors" for us to provide sufficient guarantees and implement appropriate technical and organisational measures to secure your data; and to only process personal data for specified purposes and commit themselves to confidentiality.

Duration of retention of your data

We will only keep your data for as long as is necessary for the purpose for which it was collected, subject to satisfying any legal, accounting or reporting requirements. At the end of any retention period, your data will either be deleted completely or anonymised (for example, by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning). In some circumstances, you can ask us to delete your data.

Keeping your information up-to-date

To ensure that your personal information is accurate and up to date, please promptly advise us of any changes to your information by contacting us via the details set out below.

Marketing

A member of the EcoGraf group of companies may use your personal information to contact you (including by telephone call, SMS or email) in relation to products, services or other offers we think may be of interest to you. This includes the products, services and other offers of:

- that EcoGraf group member;
- another member of the EcoGraf group of companies in Australia or overseas; and
- third parties.

You may opt-out of receiving marketing information from EcoGraf at any time by contacting us using the contact details which appear immediately below under the heading "How can you access or correct your personal information and contact EcoGraf?".

How can you access or correct your personal information and contact the EcoGraf Group?

Please contact us if you would like to seek access to, or request that we correct, the personal information we hold about you:

- by mail: EcoGraf Limited; PO Box 65, WEST PERTH, WA, AUSTRALIA, 6872
- by telephone: + 61 8 6424 9000; or
- by email: info@ecograf.com.au

EcoGraf will generally provide you with access to your personal information if practicable and will take reasonable steps to amend any personal information about you which is inaccurate or out of date. In some circumstances and in accordance with the Privacy Act, EcoGraf may not permit you access to your personal information, or may refuse to correct your personal information, in which case we will provide you with the reasons for this decision.

How EcoGraf handles complaints

If you have any concerns or complaints about the manner in which your personal information has been collected or handled by EcoGraf, please advise us of your concern or complaint in writing and send it to the Company Secretary using the mailing address set out above. Your concern or complaint will be considered or investigated and we will endeavour to respond to your complaint as soon as practicable after receipt, which is generally within 14 days.

It is our intention to use our best endeavours to resolve any complaint to your satisfaction. However, if you are unhappy with our response, you may contact the Office of the Australian Information Commissioner on the contact details set out below, who may investigate your complaint further.

Security

We use a number of mechanisms to protect the security and integrity of your personal information. Unfortunately, no data transmission over the Internet can be guaranteed as completely secure. While we strive to protect such information, we cannot ensure or warrant the security of any information you transmit to us and you do so at your own risk. Once your personal information comes into our possession, we will take reasonable steps to protect that information from misuse and loss and from unauthorised access, modification or disclosure.

If you have any questions or feedback about privacy on our Website or this Privacy Policy, please contact us via the details set out above.

Further information and complaints

Further information about the application of the Privacy Act can be found at the website of the Office of the Australian Information Commissioner (OAIC). In addition, you may make a written complaint to the OAIC if you are not satisfied with our response to your query or complaint, using the details below:

Complaints must be made in writing.

Phone: 1300 363 992

Mail: Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001

Website: www.oaic.gov.au

Changes to our Privacy Policy

This Privacy Policy is effective from 12 December 2019. As this Privacy Policy is updated from time to time, to obtain a copy of the latest version at any time, you should visit our website at www.ecograf.com.au or contact the Company Secretary.