

PRIVACY POLICY

1 Privacy Policy

(a) This is the privacy policy of Opex Pty Ltd (ACN 159 081 866) ('Opex', 'we'). The purpose of this policy is to ensure that any individual who provides information to Opex is protected under Australian law, in accordance with the Privacy Act 1988 (Cth) ('Privacy Act').

(b) Words defined in the Privacy Act have the same meaning when used in this policy.

2 Protecting your privacy

(a) We seek to protect and maintain the privacy, accuracy and security of your information. We will comply with the Australian Privacy Principles ('APPs') in the Privacy Act.

(b) Opex provides services, infrastructure and software as a service to clients and does not handle, use or process any of the information held by its clients other than for your use.

3 Collection of information

(a) Our customers include professional service providers and we collect information from, or have access to information through, various data sources, including but not limited to Customer Relationship Management Systems pertaining to data regarding your clients. ('information').

(b) Although we rarely collect information in our own right, we may have access to information as part of providing services to our clients. In this policy, the word 'collect' includes having access to.

(c) Information we may collect includes, but is not limited to:

- (i) your or your employees':**
(A) name;
(B) role;
(C) email addresses; and
(D) telephone and mobile numbers; ('your information');

- (ii) your clients':**
(A) name;
(B) date of birth;
(C) gender;
(D) email addresses;
(E) tax file number;
(F) financial information; and
(G) telephone and mobile numbers ('your clients' information').

(d) We do not collect sensitive information about you such as your racial or ethnic origin, political opinions, religious beliefs or affiliations.

(e) If you provide information of any other person you warrant that the other person has consented to the collection of their information for the reasons it is being collected.

4 If you do not provide information

The main consequence for you, if some or all of the above information is not collected by us is that we may not be able to provide goods, services or information to you, or be able to provide them to the same standard as if we had the information requested.

5 How we collect information

We collect information about you your clients' information through XPLAN, CommPay and Xeppo software, other customer relationship management tools, from our website when you make a request or enquiry and by other means.

6 Why we collect, hold and use and disclose information

(a) We collect, use and disclose your and your clients' information when it is necessary for us to carry on our business functions or to comply with laws.

(b) We may collect, hold, use and disclose your or your clients' information to answer your enquiry or to provide the information or service that you requested.

(c) We may also collect, hold, use or disclose your information:

- (i) to enable us to develop, administer and manage our services and business;
- (ii) to customise service to better meet your needs and preferences;
- (iii) to facilitate data migration;
- (iv) through help desk services;
- (v) statistical purposes;
- (vi) future promotional and marketing purposes including direct marketing (not your clients);
- (vii) for research purposes to better improve our websites, products or services;
- (viii) other customer support purposes;
- (ix) to deal with complaints; and
- (x) when authorised or required by law.

(d) We may also collect, hold, use or disclose your clients' information:

- (i) to link our Customer Relationship Management Systems or other;
- (ii) to fix any technical issues in XPLAN;
- (iii) to enable us to develop, administer and manage our services and business;
- (iv) to customise service to better meet your needs and preferences;
- (v) facilitate data migration;
- (vi) through help desk services;
- (vii) for research purposes to better improve our products or services;
- (viii) other customer support purposes;
- (ix) to deal with complaints; and
- (x) when authorised or required by law.

7 Direct Marketing

Opex may send you marketing material. You may choose to "opt-out" of receiving this material by contacting us using the details below. Opex will not charge you any additional cost or in any way disadvantage you for choosing to "opt-out" of receiving marketing material.

8 When we may disclose your information to third parties

- (a) In the course of conducting our business we may provide your information to:
 - (i) our related companies; or
 - (ii) our professional advisers, including our lawyers, auditors and accountants.
- (b) We may disclose your information to third parties:
 - (i) to meet the purpose for which it was submitted;
 - (ii) if we have your consent to do so or otherwise when we are authorised by law; or
 - (iii) if we are required by law to disclose the information.
- (c) We will not provide your clients' information to our professional advisers, including our lawyers, auditors and accountants.
- (d) We will not provide your client's information to third parties for any other purpose unless first approved by you.

9 Overseas recipients

We have contractual relationships with overseas service providers who act as our subcontractors to fulfill certain aspects of our service provision. We may disclose information to such contractors, and our contracts with them require them to keep the information secure.

10 Security

All information held by us will be handled and stored in accordance with our obligations under the Privacy Act. We will take reasonable steps to:

- (a) make sure that the information we collect, use or disclose is accurate, complete and up to date;
- (b) protect the information from misuse, interference, loss or unauthorised access, modification or disclosure both physically and through security methods; and
- (c) destroy or permanently de-identify the information if it is no longer needed for any purpose.

11 Website

- (a) When you visit our website or access XPLAN or Xeppo, we or agencies on our behalf and our internet service provider may monitor and take a record of your visit and log "click stream data" for statistical purposes such as your server's IP address.
- (b) This privacy policy is strictly limited to the collection, storage and use of personally identifiable information collected by Opex, in the course of business, and does not apply to any third parties. We have no control over the privacy practices or the content of any third party websites, and assume no liability for the privacy practices of these websites.
- (c) Any Link on the Opex site to external entities are not covered within this policy. The terms and conditions set out in this privacy statement only cover the domain name of <http://www.opexconsulting.com.au>

12 Privacy

- (a) To protect your information and your clients', the request to us must be in writing and can be sent by letter or facsimile or email. All correspondence should be addressed to:

Mail: Level 4,
26 Flinders St
ADELAIDE SA 5000
Email: admin@opexconsulting.com.au
- (b) Our objective is to respond to any request in accordance with your Service Level Agreement.
- (c) We also aim to ensure that information is accurate, up to date and complete. Amendment of information will be conducted upon written or verbal request from you.

13 Complaints

- (a) We are committed to the protection of your privacy and information. Complaints you may have about your information or your clients' information can be lodged with us by using the contact details above.
- (b) We will attempt to resolve any complaints within 10 working days. If resolution is not possible within this timeframe we will contact you to discuss the matter further.
- (c) You also have the right under the Privacy Act to make a complaint to the Information Commissioner.

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Changes to this policy

This policy is subject to change over time without prior notice. We may amend this policy by updating this posting.

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Copies of this policy

You can ask us to provide you with a copy of this policy, including a hard copy, by contacting us using the contact details above.

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