

THE MESSAGE CENTRE PTY LIMITED

The Message Centre Pty Limited (“TMC”, “we”, “us”) and its related companies comply with this privacy policy (“Privacy Policy”) and with the Australian Privacy Act 1988 (Cth) and the New Zealand Privacy Act 2020 (“Applicable Privacy Laws”) (to the extent these apply to each TMC entity).

This Privacy Policy does not limit or exclude any of the rights under the Applicable Privacy Laws in which our website and services are available. For more information, see:

- For Australian residents, the Australian Privacy Act 1988.
- For New Zealand residents, the New Zealand Privacy Act 2020.

This Privacy Policy outlines the type of personal information we may hold, the purposes for which it is held, and how that information is collected, held, used and disclosed. Our site may provide links to third party websites. TMC is not responsible for the conduct of other companies linked to this site. You should refer to the privacy notices of any third party sites.

When we refer to “personal information” throughout this Privacy Policy, we mean personal information as defined in the Applicable Privacy Laws, namely:

- In Australia: information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in material form or not.
- In New Zealand: information about an identifiable individual.

HOW PERSONAL INFORMATION IS COLLECTED

The personal information that TMC collects could include your name, age, gender, the organisation you work for and ABN or NZBN, your physical address, postal address, telephone and fax numbers and your e-mail address. In some circumstances, a failure to provide such information could result in TMC being unable to assist you or provide its services to you. TMC primarily collects information about you when you use or request a product or service, complete a survey or questionnaire, or when you communicate with TMC by e-mail, telephone, in writing or in person. TMC also collects information about you if you are providing goods or services to TMC or, if you apply for employment at TMC, through the staff recruitment and selection process.

We will only collect information about an individual for purposes which are relevant to TMC business. For example, we may collect an individual's name, contact information and other details relevant to our business relationship with that person. This information may be required to respect an individual's request or provide our services. In some cases we may also be required by law to collect personal information, for example, occupational health and safety laws, laws relating to consumer credit, anti-money laundering or corporations.

In some instances if all necessary personal information is not provided, TMC may be unable to assess or process your information or provide you with the services you require.

We may also collect anonymous information regarding visitors to our TMC website. This may include Internet Protocol (IP) address, previous sites visited, internet provider location and date and time of the visit.

SENSITIVE INFORMATION

We may collect sensitive information, such as health information and information about personal attributes such as nationality, when it relates to the provision of a service or its evaluation. Sensitive information also includes information or an opinion relating to a person's racial or ethnic origin, political views or memberships, religious beliefs or affiliations, membership of a professional or trade association or trade union, sexual orientation or practices and criminal record – though we would need a specific reason to request such information. TMC will only collect this information with your consent and in accordance with the Australian Privacy Act 1988 and the New Zealand Privacy Act 2020 (to the extent either are applicable).

HOW PERSONAL INFORMATION IS USED

TMC uses personal information to assist it in providing services and for associated business development. TMC also uses personal information to perform its corporate and contractual obligations. Unless otherwise required by law, TMC will not use the information for any purpose other than for purposes directly related to providing our services to you and for conducting our business activities. TMC may also collect information in order to improve its service to users of this TMC website.

HOW PERSONAL INFORMATION IS DISCLOSED

Personal information held by TMC is disclosed by TMC in accordance with the Applicable Privacy Laws . TMC will only disclose personal information to a third party where TMC has your consent, or where the disclosure is permitted or required by law. For example, TMC may disclose information as follows to:

- TMC related companies
- Clients where required for specific business purposes
- External providers, such as suppliers, consultants and agents, including organizations that provide information technology and infrastructure support services
- Tax, financial, audit and legal advisers
- Government, regulatory and law enforcement bodies
- To protect and/or enforce our legal rights and interest, including defending any claim
- For any purpose authorised by you or Applicable Privacy Laws

Personal information collected from TMC existing and prospective customers, prospective employees, contractors, and suppliers may be transmitted to and stored on databases and/or servers operated and processed by TMC, or their external service providers, outside of New Zealand or Australia. TMC takes reasonable steps to ensure that your personal information is given the same privacy protection as it is afforded in Australia or New Zealand (as the case may be).

By providing us with your personal information, you agree to this transfer, storing and processing of your personal information.

If at any time we need to send personal information outside of New Zealand and/or Australia to an overseas entity that may use the information for its own purposes, we will:

- a) take steps to ensure that we believe on reasonable grounds that the overseas agency receiving the Personal Information is subject to privacy protections, that overall, provide comparable safeguards to those provided under the Applicable Privacy Laws;
 - b) enter into a binding contractual arrangement with the overseas agency receiving the personal information, confirming that it will protect the personal information in a way that, overall, provides comparable safeguards to those provided under Applicable Privacy Laws;
- or

c) obtain the express authorisation of the individual concerned to disclose their personal information overseas after expressly informing them that the overseas agency may not be required to protect the information in a way that, overall, provides comparable safeguards to those provided under Applicable Privacy Laws.

SECURITY OF YOUR PERSONAL INFORMATION

TMC takes reasonable precautions including administrative, technical and physical measures to safeguard your personal information against loss, theft, or misuse, as well as against unauthorized access, use, modification, disclosure, alteration or destruction.

We protect electronic data using a variety of security measures including password access, data back-up and firewalls.

We also train our staff who handle personal information to respect the confidentiality of the information and the privacy of individuals.

KEEPING PERSONAL INFORMATION UP TO DATE AND CORRECT

TMC seeks to ensure that the personal information it holds is accurate, up-to-date, complete, relevant, and not misleading. If you inform us that the information we hold about you is inaccurate, out-of-date, incomplete, irrelevant, or misleading we will take appropriate steps to correct the information or ensure that the amendments or errors are noted.

WHEN PERSONAL INFORMATION IS NO LONGER NEEDED

We do not keep personal information if it is no longer needed for the purposes for which it was collected, and the law no longer requires us to retain it. We use secure methods to destroy or de-identify the information. We dispose of all hard copy documents and delete electronic information from our systems.

ACCESS

You have the right to ask for the personal information held about you. If you make an access request, TMC will ask you to verify your identity and specify what information you require. Your request must be in writing and directed to our Privacy Officer. Our contact details are provided in the Further Information section at the end of this document.

TMC may ask the reason for your request so we can assist you most effectively. However, you are under no obligation to provide a reason if you do not wish to. TMC reserves the right to charge a fee for any significant costs incurred by us in providing access to personal information. These costs will be notified to you for your approval prior to providing access.

Although it is not our preference to deny requests for access to a person's own personal information, TMC may refuse access in certain situations in accordance with the Applicable Privacy Laws.

HOW WE USE COOKIES

We use Google and AdRoll's remarketing service to deliver targeted ads. These platforms may place cookies on website visitor's browsers for targeted advertising purposes. AdRoll and Google collect website activity data and cookie identifier data. This is used to show ads on sites across the internet. We do not store any personal information about our website visitors (unless they register their details via a contact form). If you wish to opt out of receiving targeting advertising from Google or AdRoll, click [here](#).

PRIVACY BREACHES

TMC takes privacy breaches seriously and has procedures to help identify and resolve a breach, potential breach, or complaint as quickly as possible. This includes appropriate escalation processes to the relevant supervisory authority and notification processes in the event of a breach.

If your personal information is involved in a privacy breach which we reasonably believe is notifiable or must be reported in accordance with the Applicable Privacy Laws ("Notifiable Privacy Breach"), we will inform the affected individual(s) and report the Notifiable Privacy Breach to the relevant supervisory authorities as required by the Applicable Privacy Laws (the New Zealand Office of the Privacy Commissioner and/or the Office of the Australian Information Commissioner).

COMPLAINTS

If you believe your personal information is not properly protected, or that there has been a breach or potential breach of this Privacy Policy or the Applicable Privacy Laws, please contact TMC immediately and ask for your complaint or concern to be directed to the Privacy Officer (using the contact details provided in the Further Information section at the end of this document).

Once the Privacy Officer receives your complaint, you will be notified of the process for dealing with it. Your complaint will be thoroughly investigated and a suitable resolution negotiated with you.

If you are not satisfied with the resolution of your complaint by TMC:

- In Australia you may complain to the Office of the Australian Information Commissioner (OAIC)(<http://www.privacy.gov.au/complaints>).
- In New Zealand, you may complain to the Office of the Privacy Commissioner (<http://www.privacy.org.nz>).

FURTHER INFORMATION

For enquiries or feedback about this policy or for complaints about TMC handling of personal information, please e-mail the Privacy Officer at privacy@tmc.net, or by post to Privacy Officer at The Message Centre Pty Ltd, 41 Northern Road, HEIDELBERG WEST Australia 3081, or Telephone 1300 728 268.

CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time to reflect changes in our business or the law.

We will notify you of any updates to the Privacy Policy by publishing the updated version on our website. Any revised Privacy Policy will apply from the date on which we upload it to our website.

We encourage you to periodically review the Privacy Policy on our website.

This document was last updated on 15th March 2023.