

# PRIVACY POLICY

## E.W.S (Australia) Pty Ltd Pty Ltd (ABN 93 603 150 456)

E.W.S (Australia) Pty Ltd (ABN 93 603 150 456), its subsidiaries and affiliates in Australia (collectively referred to as “EWS”) are subject to the Privacy Act (Cth) 1988 (the Act).

This document is the Privacy Policy of EWS, developed pursuant to the Act, in relation to the collection, use and storage of personal information about you.

EWS is committed to managing personal information in accordance with the Australian Privacy Principles under the Act and in accordance with other privacy laws.

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### 1. WHAT IS PERSONAL INFORMATION?

The Privacy Act 1988 (Cth) currently defines “personal information” as meaning information or an opinion about an identified individual or an individual who is reasonably identifiable:

- (a) whether the information or opinion is true or not; and
- (b) whether the information or opinion is recorded in a material form or not.

If information does not disclose your identity or enable your identity to be ascertained, it will in most cases not be classified as “personal information” and will not be subject to this privacy policy.

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### 2. COLLECTION OF INFORMATION

To enable us to provide our services to you, we may collect personal information about you. That information may be provided by you or by some other person with your consent.

For instance, when you visit our website or use our app, we may collect details such as your name, contact details, next of kin, date of birth, gender and banking details. This information will assist us in delivering our services to you.

We may also collect personal information about you if you contact us. For example, if you telephone us, we may keep a note of any conversation or if you email or write to us, we will keep a copy of any correspondence you send to us. If you email us, we will also keep a record of your email address. If you access our website we may collect cookies from your computer which enables us to tell when you use the website and also to help customise your website experience. As a general rule, however, it is not possible to identify you personally from our use of cookie

By visiting our website or downloading our app you consent to the collection of information which is provided to us for use in accordance with this Privacy Statement.

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### 3. PURPOSE OF COLLECTION

The purpose for which we collect personal information is:

- a) to provide you with the best service experience possible on our website and our app; and

- b) so that we can better understand the usage of our services to better improve the quality of our services based on the users' actions.

We customarily disclose personal information only to our service providers who assist us in operating the website and our app. Your personal information may also be exposed from time to time to maintenance and support personnel acting in the normal course of their duties.

By visiting our website and using our app, you consent to the receipt of direct marketing material. We will only use your personal information for this purpose if we have collected such information direct from you, and if it is material of a type which you would reasonably expect to receive from use.

We do not use sensitive personal information in direct marketing activity. Our direct marketing material will include a simple means by which you can request not to receive further communications of this nature.

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#### **4. STORAGE OF INFORMATION**

Personal information received by us is stored and kept by us for so long as that information is relevant to enable us to provide our services to you. When it is no longer required by us the information will be deleted or de-identified.

All information obtained by us is stored in a secure manner. We have adopted security measures and practices to try to ensure that all information is protected against loss, unauthorised access, misuse modification or disclosure.

If it is necessary for us to provide information to another person in the circumstances set out below, we will ensure that everything reasonably within our power is done to prevent unauthorised use or disclosure of the information so provided

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#### **5. USE OF INFORMATION**

Subject to what is set out below, we will only use the information obtained by use for the primary purposes for which it was obtained by us or any secondary purposes directly related to the primary purpose. The primary purpose for which information is collected is to enable you to experience the best service possible on our website and in using our app.

We customarily disclose personal information only to our service providers who assist us in the operation of our website and our app. Your personal information may also be exposed from time to time to maintenance and support personnel acting in the normal course of their duties.

The law does allow for us to also use or disclose information in the following circumstances:

- You have consented to the disclosure
- We believe, on reasonable grounds, that the disclosure is necessary to prevent or lessen a serious and imminent threat to the life or health of the individual concerned or another person;
- The disclosure is required or authorised by or under and law; or
- The disclosure is reasonably necessary for the enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of public revenue.

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## 6. TRANSFER OF INFORMATION OVERSEAS

We may disclose information third party service providers, who may be located out of Australia including in the USA, the UK, India and others.

Where we do so disclose, we will use our best endeavours to ensure such parties:

- are subject to a law, a binding scheme or contract which effectively upholds principles for fair handling of the information that are suitably similar to the Australian Privacy Principles; or
- otherwise take appropriate measures to protect that information and to restrict how they can use that information.

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## 7. ACCESS TO INFORMATION

Australian Privacy Principle 12 permits you to obtain access to the personal information we hold about you in certain circumstances, and Australian Privacy Principle 13 allows you to correct inaccurate personal information subject to certain exceptions. If you would like to obtain such access, please contact us as set out below.

You may request access to any personal information held by us about you at any time. We will provide you with access to that information consistent with the requirements imposed upon us by the Act. You can request access by sending us an email to [info@ewsaustralia.com](mailto:info@ewsaustralia.com).

If for any reason set out in the Act we decline to provide you access to the information, we will provide our reasons for doing so.

We will update the information we hold about you upon receipt of such updated details from you.

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## 8. CHILDREN

Our website and our app are designed for people over the age of 18 years. It is our policy not to knowingly collect information from any person under the age of 18 years except as part of a specific engagement to provide services which necessitates such personal information be collected, for the purposes of ensuring compliance with our auditor independence policies, or as otherwise required by law

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## 9. COOKIES

We do collect information from our website using “IP Files”. When you visit our website our system records or logs your IP address, the date and time of your visit, the pages viewed and any information you download.

This information is used for our internal purposes to better customise our website and app and our services to you.

You can disable cookies at any time.

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## 10. ANALYTICS AND TOOLS

We use analytics tools, such as Google Analytics to help us understand how users use our website and our app.

Website analytics generate statistical data and other information about website use by means including but not limited to cookies stored on the user's computer.

We treat personal information that may be obtained through the use of cookies and any other information supplied to us in accordance with this privacy policy.

We currently use the following third-party cookies:

- Google Analytics
- Google Tag Manager
- Google Universal Analytics
- Onstipe
- YouTube

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## 11. THIRD PARTY LINKS AND CONTENT

Our website and app may contain links to content maintained by third parties that we do not control. You should review the privacy policies of each website that you visit

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## 12. COMPLAINTS

If you have a complaint concerning the manner in which we maintain the privacy of your personal information, please contact us at [info@ewsaustralia.com](mailto:info@ewsaustralia.com).

All complaints will be considered by our team and we may seek further information from you to clarify your concerns. If we agree that your complaint is well founded, we will, in consultation with you, take appropriate steps to rectify the problem. If you remain dissatisfied with the outcome, you may refer the matter to the Office of the Australian Information Commissioner.

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## 13. CHANGES TO THIS PRIVACY STATEMENT

We may amend this Privacy Statement as our requirements or the law changes. Any changes to this Privacy Statement will be updated and made available on our website <https://ewsmonitoring.com>.

Please visit our website if you wish to obtain the current version of our Privacy Statement.