



## RTG Privacy Policy

The RTG Privacy Policy has been developed to demonstrate our commitment to protecting your privacy and to ensure that your personal information is handled appropriately. At RTG, we are committed to protecting the privacy of all personal information that we collect.

All personal information collected by us will be treated in accordance with the *Privacy Act 1988* (Cth) (“**Privacy Act**”) which incorporates the Australian Privacy Principles (“**APPs**”). The APPs detail how personal information may be collected, used, disclosed, stored and destroyed, and how an individual may gain access to or make complaints about the personal information held about them.

We may make changes to this Privacy Policy from time to time by uploading an updated version at [www.rtg.com.au](http://www.rtg.com.au). When we do so, we will endeavour to provide notice of our changes to the Privacy Policy, including by placing a notice on our website or at the top of this Privacy Policy.

### **Who is RTG?**

In this Policy, “RTG”, “we”, “our” and “us” refers to Reflex Technology Group (ACN 006 593 844).

### **Who does the RTG Privacy Policy apply to?**

This Policy applies to any individuals in respect of whom we collect and currently hold the personal information of.

### **What information does the RTG Privacy Policy apply to?**

This Policy applies to personal information.

“Personal information” is information or an opinion about an identified individual or an individual who is reasonably identifiable, whether true or not, and whether recorded in a material form or not.

### **What information is not personal information?**

Information where we have removed any reference to a person, so that the person cannot be reasonably identifiable from the information, is not personal information.

### **What kind of personal information do we collect?**

The type of information we may collect and hold includes personal information about:

- clients and potential clients and their employees information in the course of conducting business
- vendors, suppliers and their employees
- employees, prospective employees and contractors, and
- other people who come into contact with RTG

The kinds of personal information collected and held by us include names, addresses, contact details, titles, email addresses, occupation, details of any products and services you have



purchased from RTG or enquired about, together with any additional information necessary to deliver those products and services and to respond to enquiries, information you have provided through our customer surveys, information related to RTG marketing events and other information that assists RTG in conducting its business and meeting legal obligations.

RTG also collects details about an employee or potential employee's work experience and other qualifications (through resumes, phone and face to face interviews), date of birth, driver's licence details, security check, bank account details, photographs and video footage. RTG may collect 'sensitive information' for its current and potential employees such as an individual's criminal record or health information.

### **Why we collect, use and disclose personal information**

RTG's primary purpose of collecting, holding, using and disclosing personal information is to facilitate the provision of information technology products, services and solutions to you or your organisation. We endeavour to collect business information only. However, the collection of personal information in some instances is necessary or unavoidable.

For example, when carrying out a project with a customer, we may collect the contact details of the relevant customer personnel in order to liaise with them during the life of the project. Other examples of why we collect personal information is so we can:

- identify you, your company and conduct appropriate checks
- understand your business and your requirements to ensure we provide an appropriate product, service or solution
- set up, administer and manage our products, services and systems
- manage, train and develop our employees and representatives
- recruit new employees
- manage complaints and disputes

If we do not collect, hold, use or disclose your personal information, or if you do not provide your consent, then we may not be able to answer your enquiry, complete the transaction you have entered into, or provide the services that you or your organisation has contracted us to provide.

### **Information collected via our Website**

We will not collect any Personal Information about users of our Website except when they knowingly provide it or as otherwise described below. For example, we may collect Personal Information from you when you use our Website when you:

- (a) complete an online form; and/or
- (b) otherwise correspond with RTG.

### **Click Stream Data**

When you visit and browse our Website, our Website host may collect Personal Information for statistical, reporting and maintenance purposes. Subject to the clause 'Disclosure of personal information', the Personal Information collected by our Website host will not be used to identify you. The information may include:

- (a) the number of users visiting our Website and the number of pages viewed;
- (b) the date, time and duration of a visit;



- (c) the IP address of your computer; or
- (d) the path taken through our Website.

RTG's Website host uses this information to administer and improve the performance of our Website.

### **Cookies**

Cookies are small text files that are transferred to a user's computer hard drive by a website for the purpose of storing information about a user's identity, browser type or website visiting patterns. If you access our Website, a cookie is downloaded onto your computer's hard drive when you first visit to our Website. You can adjust your internet browser to disable cookies, however we may not be able to provide you with all the service or functionality you require on our Website if you choose to do so.

### **Web Beacons**

Web beacons are images that originate from a third party site to track visitor activities. We may use web beacons to collect aggregate data and provide this information to our Website host to administer and improve the performance of our Website.

### **Advertising**

We use Google and/or other third-party service providers to serve ads on our behalf across the Internet and sometimes on our Website. They may collect anonymous information about your visits to our Website (not including your name, address, email address or telephone number), and your interaction with our products and services. They may also use information about your visits to the Website and other websites to target advertisements for goods and services in order to provide more relevant advertisements about goods and services of interest to you.

### **How and when do we collect personal information?**

Where reasonable and practicable, we will collect personal information directly from you and will inform you that this is being done. For example, we may collect personal information from you or about you in a variety of ways in the course of conducting our business, including from:

- letters, emails and contracts that you submit to us;
- telephone calls with us;
- responses to a survey;
- requests or feedback submitted on our website;
- interviews and meetings
- registration and attendance at events and business cards;
- information from our IT ticketing system;
- when we purchase your products and services;
- when we market our products, services and solutions

However, in some circumstances, it is necessary for us to collect personal information through third party service providers or agents (e.g. customer information received from our customers), from a source of publicly available information (e.g. a telephone book) or from a recruiter, business partner or online recruitment sites (e.g. where a contractor or candidate provides personal information).

If we receive personal information that we have not requested (unsolicited information) and we determine that we could not have collected that information under the APPs if we had



requested it, then we will destroy or de-identify the information if it is lawful and reasonable to do so.

Where practicable, you may request to deal with us anonymously or by pseudonym. However this may not be practical where:

- the use of your true identity is a legal requirement; or
- it is impracticable for us to deal with you on such basis.

### **How we use your personal information**

The use to which we can put personal information depends on the reason for which it was collected.

In most circumstances, unless authorised by you, or as required by law, the information which you provide to us is only used for the purpose for which it is collected or for a related purpose that is within the scope of the our contractual agreement with you.

We may also use personal information for any related secondary purpose that we could reasonably be expected to use the personal information for such as administrative and accounting functions, warranty work and the like.

In certain circumstances, we may use personal information for promotional or direct marketing purposes. However, at any time you may request that we are not to use your personal information for sending direct marketing material to you. Such a request can be made by contacting us either in writing, by email or by telephone at the contact details below. There is no fee for making such a request.

### **Disclosure of personal information**

We respect the privacy of personal information and will take reasonable steps to keep it strictly confidential.

We will disclose personal information to third parties if it is necessary for the primary purpose of collecting the information, or for a related secondary purpose, if the disclosure could be reasonably expected (e.g. disclosure to a third party (technical) service provider for the purpose of delivering goods ordered from us). Where such a disclosure is necessary, we will require that the third party undertake to treat the personal information in accordance with the APPs.

We may also disclose your Personal Information to our Website host or service providers in certain limited circumstances, for example when our Website experiences a technical problem or to ensure that it operates in an effective and secure manner. To the extent that we do share your Personal Information with a service provider, we would only do so if that party has agreed to comply with our privacy standards as described in this Privacy Policy.

We may also share non-personal, de-identified and aggregated information for research or promotional purposes.

Unless otherwise specified in this Privacy Policy, RTG or RTG's Website host will not disclose any of your Personal Information to any other organisation unless the disclosure is required by law or is otherwise permitted by the Privacy Act.



Otherwise, we will only disclose your personal information to third parties without your consent if the disclosure is:

- necessary to protect or enforce our legal rights or interests or to defend any claims;
- necessary to prevent or lessen a serious threat to a person's health or safety;
- required or authorised by law; or
- permitted by another exception in the Privacy Act.

Under no circumstances will we sell personal information without the consent of the person to whom it relates.

### **Information Security**

Your personal information is held and stored on paper, by electronic means or both. We have physical, electronic and procedural safeguards in place for personal information and take reasonable steps to ensure that your personal information is protected from misuse, interference and loss, and from unauthorised access, modification and disclosure.

We will take all reasonable steps to ensure that all personal information held by us is secure from any unauthorised access or disclosure. However, we do not guarantee that personal information cannot be accessed by an unauthorised person (e.g. a hacker) or that unauthorised disclosures will not occur.

We use secure methods to destroy or to permanently de-identify your personal information when it is no longer needed.

### **Accessing personal information**

At any time you may request to access personal information that we hold about you. Such a request must be made in writing to the address below.

We will grant a person access to their personal information as soon as possible, subject to the circumstances of the request.

A request to access personal information will be rejected if:

- the request is frivolous or vexatious;
- providing access would have an unreasonable impact on the privacy of another person;
- providing access would pose a serious and imminent threat to the life or health of any person;
- providing access would prejudice our legal rights; or
- there are other legal grounds to deny the request.

In most cases, we expect that we will be able to comply with your request. However, if we do not agree to provide you access or to correct the information as requested, we will give you written reasons why.

### **Correcting personal information**

We will take reasonable steps to ensure the accuracy and completeness of the personal information we hold. However, if you believe that any personal information that we hold about you is inaccurate or out of date, then you should contact us in writing below.



## **Collection of sensitive information**

“Sensitive information” is personal information which also contains information or an opinion about a person’s racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, or health, genetic or biometric information.

We will not collect sensitive information unless you consent to the collection and the information is reasonably necessary for one or more of our functions or activities, except where the collection is required or authorised by law, is necessary to prevent or lessen a serious and imminent threat to your (or another person’s) life or health or is necessary in relation to legal proceedings (current, anticipated or potential), or another permitted exception in the Privacy Act applies.

## **Complaints**

If a person wishes to complain about a breach by us of the RTG Privacy Policy, the Privacy Act or the APPs, a complaint may be lodged in writing by post or by email to the address set out in “Contact Us” below.

We deal with complaints via our internal privacy complaint process, under which an RTG privacy officer will be allocated to assess your complaint and respond to you within a reasonable timeframe. We take all complaints seriously and any further action after our initial response to you will vary depending on the nature of your complaint.

## **Additional information regarding Credit/Payment Information**

This Privacy Policy also applies in relation to our collection and use of credit information of individuals, in connection with commercial credit provided by us.

The types of credit information that we collect and use for the purpose of collecting payments and/or making payments include:

- names, addresses and other contact details of accountholders (both prospective and current);
- bank account details;
- driver’s licence details; and
- financial information.

Such information is collected from you, as well as from authorised persons for an organisation. We use the information collected to make payments or send bills.

We do not disclose credit information to credit reporting bodies.

## **Contact Us**

If there are any questions regarding the RTG Privacy Policy or the way in which we manage personal information or if there are any concerns about our treatment of personal information, then we may be contacted by post, telephone or email:



RTG Privacy Officer  
Level 1, 15-17 Shierlaw Ave  
Canterbury Vic 3126  
Telephone: 1300 362 456  
[privacyofficer@rtg.com.au](mailto:privacyofficer@rtg.com.au)

### **Disclaimer**

While reasonable effort has been taken to ensure the accuracy of information on this website, RTG, its employees and agents makes no representation, expressly or impliedly, as to the accuracy, currency, reliability or suitability of the information and data. We disclaim responsibility for any damages that may be caused by the contents of this website. The RTG website may contain links to third parties. The links are provided solely for your convenience and do not indicate, expressly or impliedly, any endorsement by us of the information, products or services provided by those websites.

### **Updated Policy**

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