



# Waveconn Privacy Policy

## Introduction

This Policy is the Privacy Policy of Waveconn Group Holdings Trust and all related entities (**Waveconn, we, us, our**). It sets out how we manage the collection, use and disclosure of personal information from individuals (**You, Your**), and how You can access or correct the information we hold about You.

When we refer to “Your information”, we are referring to Your personal information, as defined under the Privacy Act. Essentially this is any information or opinion about You that is capable, or reasonably capable, of identifying You, whether the information or opinion is true or not and is recorded in material form or not.

## Purposes for collection, use and disclosure of personal information

We collect, use and disclose personal information when it is reasonably necessary for one or more of our functions or activities.

These include:

- to provide You with access to and use of our site access platform, systems, products and services;
- to verify that the information You provide to us is correct;
- to protect You and us against fraud, prohibited or unlawful activity which may cause You or us harm in relation to our products or services;
- to receive services;
- to maintain and develop our business systems, processes and infrastructure;
- to assess job applications and conduct recruitment processes;
- to manage employment relationships, including payroll, performance management, training and workplace health and safety;
- conducting events; and
- to meet legal and regulatory requirements or where permitted by law.

## Definitions

- **Personal information:** means any information or opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether it is recorded in a material form or not. This includes, but is not limited to, a person's name, address, date of birth, contact details, and employment information.
- **Sensitive information:** is a subset of personal information that is afforded a higher level of privacy protection. It includes information or opinion about an individual'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; health information; genetic information; biometric information that is to be used for the

purpose of automated biometric verification or biometric identification; biometric templates; and any other information classified as sensitive information under the Privacy Act 1988 (Cth).

## When You visit our website or platform

When You access our website or site access platform we may collect non-personal information in aggregate form, such as Your browser type, which pages of our site You access and Your IP address. We use this aggregate information to understand how our users use our website or platform.

We also use 'cookies' which are records of Your interaction with our site that are stored by Your browser. Cookies help make Your browsing experience easier, by for example, remembering the information You previously entered. You can disable some cookies through Your browser settings.

## Information we may collect

We may collect the following personal information about You:

- information to identify You, including Your name, ABN, date of birth and contact details such as mobile number and email address;
- bank and payment details;
- information about online browsing behaviour on Waveconn-issued devices or systems, collected for cybersecurity, network integrity and IT security purposes only;
- location data (e.g., whilst You are visiting a site);
- employment history, qualifications, references and background check results (for job applicants);
- employment records, performance data, leave entitlements and workplace incident reports (for employees);
- the contents of communications with You; and
- such other information we consider necessary to our functions and activities.

Some of the categories above may include sensitive information (as defined in this Policy). We will only collect sensitive information with your prior consent or as otherwise required or authorised by law, as detailed in the Sensitive information section below.

### How we collect personal information

We will only collect personal information directly from You (rather than someone else) unless it is unreasonable or impracticable to do.

### Incomplete or inaccurate information

We may not be able to provide You with the products or services You are seeking if You provide incomplete or inaccurate information.

### Sensitive information

We will only collect sensitive information about You if we obtain prior consent to the collection of the information or if the collection is required or authorised by law.

### Security of personal information

We are committed to ensuring that we protect any personal information we hold from misuse, interference, loss, unauthorised access, modification and disclosure.

For this purpose, we have a range of practices and policies in place to provide a robust security environment. We ensure the on-going adequacy of these measures by regularly reviewing them.

We may hold Your personal information in physical form or in electronic form on computer systems located in Australia, including with contracted third-party technology and 'cloud' storage providers.

We take reasonable steps to protect Your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorised access, disclosure, and alteration of Your personal information. Safeguards include the use of firewalls and data encryption, physical access controls to the data centres, and information access authorisation controls.

## Who we may disclose information to

Depending on the nature of our interaction with You, the types of entities we exchange Your information with are primarily:

- regulatory bodies if reasonably necessary as part of our interactions with them;
- external organisations that are our assignees, agents or contractors as part of their responsibilities to support provision of services to us;
- companies that help us provide our services, such as technology services providers as part of their responsibilities to support provision of services to us;
- recruitment agencies, referees and background check providers (for job applicants);
- payroll service providers, superannuation funds, workers' compensation insurers and government agencies as required by employment law (for employees);
- third parties who assist us in providing marketing offers to You; and
- other persons and entities as permitted or required under law.

We will take reasonable steps to ensure that the organisations and individuals that we disclose Your personal information to are bound by sufficient confidentiality and privacy obligations with respect to the protection of Your personal information in compliance with the law.

## Direct marketing

Subject to Your choices, we may use or disclose Your personal information for the purpose of direct marketing.

You can opt-out of receiving marketing information by contacting us.

## Access to and correction of personal information

You have a right to request access to the personal information we hold about You. We will generally be able to meet Your request, subject to certain exceptions under the Privacy Act. We may charge for giving access to personal information and will inform You in advance of any likely charge. If You would like to access Your information, please contact us on the details set out below. Your request will usually receive a response within 5 business days or a reasonable timeframe.

In the event that we refuse You access to Your personal information, we will provide You with an explanation for that refusal. These reasons may include:

- where providing access will provide a serious threat to life or health of any individual or pose an unreasonable impact on the privacy of other individuals;
- the request for access is frivolous or vexatious;
- the information relates to legal proceedings between us and You;
- the information would reveal our commercially sensitive decision-making process; or
- we are prevented by law from disclosing the information or providing access.

Waveconn takes reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete, up-to-date and relevant to the products or services provided to You or the nature of our relationship with You.

If You believe that this is not the case in relation to any personal information we hold about You, You have the right to request that we correct Your personal information. To request correction of Your personal information, please contact us on the details set out below.

### Questions or concerns

- If You have any questions or concerns regarding this Privacy Policy or our handling of Your personal information, please contact us.
- We will investigate and will use reasonable endeavours to respond to You in writing within a reasonable time of receiving the question or complaint. If we fail to respond within a reasonable time of receiving it in writing or if You are dissatisfied with the response that You receive from us, You may have the right to make a complaint to the regulator (depending on Your jurisdiction).

### Contact details

- Please email the Waveconn Policies and Compliance Team at [Policies@Waveconn.com](mailto:Policies@Waveconn.com)
- The current Privacy Officer is Director of Legal.

### Changes to this privacy policy

We may make changes to this Privacy Policy from time to time, by publishing our updated privacy policy on our website.