

MobileCorp Privacy Policy

We understand that protecting your personal information is important. This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or otherwise collected by us, offline or online, including through our products, services, website and other applications (**Services**). In this Privacy Policy **we, us** or **our** means SSS Holdings Pty Ltd ABN 22 003 702 725 t/a MobileCorp.

Types of information

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

Sensitive information: is a sub-set of personal information that is given a higher level of protection. Sensitive information means information relating to your racial or ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation or practices, criminal records, health information or biometric information.

The information we collect

Personal information: The types of personal information we may collect about you include:

- your name;
- your contact details, including email address, mailing address, street address and/or telephone number;
- your credit card or payment details (through our third party payment processor);
- information you provide to us through customer surveys;
- details of products and services we have provided to you and/or that you have enquired about, and our response to you;
- your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour;
- information about your access and use of our Services, including through the use of Internet cookies, your communications with our online Services, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider;
- additional personal information that you provide to us, directly or indirectly, through your use of our Services, associated applications, associated social media platforms and/or accounts from which you permit us to collect information; and
- any other personal information requested by us and/or provided by you or a third party.

Sensitive information: We do not actively request sensitive information about you but in providing our Services, there may be times where we see your sensitive information. If at any time we need to collect sensitive information about you, unless otherwise permitted by law, we will always require that you have given your consent and we will only use it as required or authorised by law.

How we collect personal information

We collect personal information in a variety of ways, including:

- **Directly:** We collect personal information which you directly provide to us, including through the 'contact us' form on our website or when you request our assistance via email, our online chat or over the telephone.
- **Indirectly:** We may collect personal information which you indirectly provide to us while interacting with us, such as when you use our website, in emails, over the telephone and in your online enquiries.
- **From third parties:** We collect personal information from third parties, such as third parties that we are subcontracted by (or partner with) to help them provide you with managed services, or when we collect details of your use of our website from our analytics and cookie providers and marketing providers. See the "Cookies" section below for more detail on the use of cookies. Sometimes this information may also be provided to us by other users of our Services.

Collection and use of personal information

Personal information: We may collect, hold, use and disclose personal information for the following purposes:

- to provide our Services to you whether directly, or through a third party such as a reseller, including to provide mobility management, data networks, mobile device management, managed ICT and cloud services, which could include remote access of your devices;
- to solve IT issues you are experiencing and provide customer support;
- to enable you to access and use our website, associated applications and associated social media platforms;
- to contact and communicate with you about our Services;
- for internal record keeping, administrative, invoicing and billing purposes;
- for analytics, market research and business development, including to operate and improve our Services, associated applications and associated social media platforms;
- for advertising and marketing, including to send you promotional information about our products and services and information that we consider may be of interest to you;
- to comply with our legal obligations and resolve any disputes that we may have;
- if you have applied for employment with us; to consider your employment application; and
- if otherwise required or authorised by law, such as if the information is subpoenaed.

Disclosure of personal information to third parties

We may disclose personal information to:

- third parties who you engage to provide you with services, where they subcontract those services to us;
- third party service providers for the purpose of enabling them to provide their services, to us, including (without limitation) data storage, web-hosting and server providers, debt collectors, problem-solving providers, marketing or advertising providers, professional advisors and payment systems operators;
- our employees, contractors and/or related entities;
- our existing or potential agents or business partners;
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;
- credit reporting agencies, courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;

- courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;
- third parties to collect and process data, such as Google Analytics, Facebook Pixel or other relevant businesses; and
- any other third parties as required or authorised by law.

Overseas disclosure: Where we disclose your personal information to third parties listed above, these third parties may store, transfer or access personal information outside of Australia.

We will only disclose your personal information to countries with laws which protect your personal information in a way which is substantially similar to the Australian Privacy Principles or we will take such steps as are reasonable in the circumstances to protect your personal information in accordance with the Australian Privacy Principles.

Your rights and controlling your personal information

Your choice: Please read this Privacy Policy carefully. If you provide personal information to us, you understand we will collect, hold, use and disclose your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us, however, if you do not, it may affect our ability to provide our Services to you and your use of our Services.

Information from third parties: If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

Anonymity: Where practicable we will give you the option of not identifying yourself or using a pseudonym in your dealings with us.

Restrict and unsubscribe: To object to processing for direct marketing/unsubscribe from our email database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

Access: You may request access to the personal information that we hold about you. An administrative fee may be payable for the provision of such information. Please note, in some situations, we may be legally permitted to withhold access to your personal information.

Correction: If you believe any information that we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to promptly correct any information found to be inaccurate, out of date, incomplete, irrelevant or misleading. Please note, in some situations, we may be legally permitted to not correct your personal information.

Complaints: If you wish to make a complaint, please contact us using the details below and provide us with full details of the complaint. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take in response to your complaint. You also have the right to contact the relevant privacy authority.

Storage and security

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures, to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

While we are committed to security, we cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk.

Cookies

We may use cookies on our online Services from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do recognise you when you return to our online Services and allow third parties, such as Google and Facebook, to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. If and when you choose to provide our online Services with personal information, this information may be linked to the data stored in the cookie.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our online Services.

Links to other websites

Our Services may contain links to other websites. We do not have any control over those websites, and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

Amendments

We may, at any time and at our discretion, vary this Privacy Policy by publishing the amended Privacy Policy on our website. We recommend you check our website regularly to ensure you are aware of our current Privacy Policy.

For any questions or notices, please contact our Privacy Officer at:

SSS Holdings Pty Ltd ABN 22 003 702 725 t/a MobileCorp

Email: info@mobilecorp.com.au

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