

PRIVACY POLICY

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This website is owned and operated by ADN Group Management ATF AND Solutions Trust trading as Asset Data Manager, who will be referred to as "ADM", "We", "Our" and "Us" in this Privacy Policy. By using <u>www.assetdatamanager.com</u> (this "website") or otherwise using Our services, You agree to the terms of this Privacy Policy. This Privacy Policy relates to the collection and use of personal information You may supply to Us through Your conduct on this website or where We provide services to You.

We reserve the right, at Our discretion, to modify or remove portions of this Privacy Policy at any time. Any change to Our Privacy Policy will be published on Our website. You may obtain a copy of Our current Privacy Policy from Our website or by contacting Us at Our contact details set out below. This Privacy Policy is in addition to any other terms and conditions applicable to this website. We do not make any representations about third party websites that may be linked to this website.

We recognise the importance of protecting the privacy of information collected about visitors to this website and users of Our services, in particular information or an opinion about an identified individual or an individual who can be reasonably identified from the information or opinion whether true or not ("personal information"). This Privacy Policy governs the manner in which Your personal information, obtained through this website, will be dealt with. This Privacy Policy should be reviewed periodically so that You are updated on any changes. We welcome Your comments and feedback.

Personal Information

- I. We may collect information about You and Your interactions with Us, for example, when You use Our services, call Us or visit Our website. The information We collect from You will depend on how you chose to interact with us. It may include Your identify and contact details, Your history of services and details of enquiries or complaints You make. In each case, we only collect as much information as is necessary or appropriate given the type of interaction.
- 2. If You do not provide Us with Your personal information We may not be able to provide You with Our services, communicate with You or respond to Your enquiries.

Use of Information

3. Personal information that You submit to Our website is used only for the purpose for which it is submitted or for such other secondary purposes that are related to the primary purpose, unless We disclose other uses in this Privacy Policy or at the time of collection. Copies of correspondence sent from Our website, that may contain personal information, are stored as archives for record-keeping and back-up purposes only.

Collecting information on Registered Users

- 4. As part of registering as a "user" with Us, We collect personal information about You in order for You to take full advantage of Our Service/s. To do this it may be necessary for You to provide additional information to Us as detailed below.
- 5. Registration is completely optional. Registration may include submitting Your name, email address, address, telephone numbers, option on receiving updates and promotional material and other information. You may access this information at any time by logging in and going to Your account.
- 6. If You provide Us with personal information of other parties such as Your authorised users, You must ensure that You have the consent to provide Us with that information.

Disclosure

- 7. We may disclose Your personal information where:
 - a. We are required or authorised by law to do so;
 - b. You may have expressly consented to the disclosure or the consent may be reasonable inferred in the circumstances; or
 - c. We are otherwise permitted to disclose the information under the Australian Privacy Act.
- 8. We may engage third parties to provide You with Service/s on Our behalf. In that circumstance, We may disclose Your personal information to those third parties in order to meet Your request for Service/s.
- 9. We do not disclose Your personal information to a recipient which is / recipients which are located outside of Australia.

Security

- 10. We strive to ensure the security, integrity and privacy of Your personal information, and We review and update security measures in light of current technologies. Unfortunately, no data transmission over the Internet can be guaranteed to be totally secure.
- 11. When purchasing a Service/s from Us, Your financial details are passed through a secure server using the latest 128-bit SSL (secure sockets layer) encryption technology. 128-bit SSL encryption is the current industry standard. If You have any questions regarding the security policy, please contact Us via the Contact page on Our website.
- 12. However, We will endeavour to take commercially reasonable steps to protect the personal information You may transmit to Us. Once We do receive Your transmission, We will also use commercially reasonable efforts to ensure its security on Our Service/s.
- 13. In addition, Our employees and the contractors who provide Service/s related to Our information systems are obliged to respect the confidentiality of any personal information held by Us.
- 14. We will also take reasonable steps to destroy or de-identify personal information once We no longer require it for the purposes for which it was collected or for any secondary purpose permitted under the Australian Privacy Principles.

Collecting Information from Users

15. IP Addresses

Our web servers may gather Your IP address, URL and the unique identification number associated with your account. to assist with the diagnosis of problems or support issues with Our Service/s. We may collect this information to identify you, for example, if we believe you are degrading the experience of the service for other users,

16. Cookies

We use cookies and other tracking technologies to provide You with a better experience by tracking your use, visits and interaction with our site. These cookies and other tracking technologies allow Us to increase Your security by storing Your session ID and are a way of monitoring single user access.

This information is collated and provided to Us to assist in analysing the usage of the site. You may refuse to use cookies by selecting the appropriate settings on Your browser. However, please note that if You do this, You may not be able to use the full functionality of the website.

Marketing

- 17. We will use Your personal information to offer You services We believe may interest You, but We will not do so if You tell Us not to.
- 18. When You receive electronic marketing communications from Us, You may opt out of receiving further marketing communications by following the opt out instructions provided in the communication.

Access to Information

- 19. We will endeavour to take all reasonable steps to keep secure any information which We hold about You, and to keep this information accurate and up to date. If, at any time, You discover that information held is incorrect, You may contact Us at the details set out below to have the information corrected.
- 20. In addition, Our employees and the contractors who provide services related to Our information systems are obliged to respect the confidentiality of any personal information held by Us.

Problems or questions

- 21. If We become aware of any ongoing concerns or problems with Our website, We will take these issues seriously and work to address these concerns. If You have any further queries relating to Our Privacy Policy or You have a problem or complaint, please contact Us by:
 - a. filling out a form located on Our "Contact" page which can be found on Our Website; or
 - b. telephoning Us at +61 8 9466 3474.
- 22. We will consider Your complaint and determine whether it requires further investigation. We will notify You of the outcome of this investigation and any subsequent internal investigation.
- 23. For more information about privacy issues in Australia and protecting Your privacy, visit the Australian Federal Privacy Commissioner's website; <u>www.privacy.gov.au</u>.