

COLLECTION NOTICE

- If you provide us personal information, we will make a record of it.
- We ask you for personal information when you inquire about our services, sign up for our services, and when your contact information changes while we are providing services to you.
- We collect personal information about customers and potential customers to:
 - Enable us to offer services to customers and potential customers
 - Provide those services and to communicate with our customers about the services
 - Invoice you for services and to collect payment for services.
- We make every effort to ensure personal information we hold is accurate
- This policy contains information about how you may access the personal information we hold about you and seek correction of such information.
- This policy contains information about how you may complain about a breach of the Australian Privacy Principles, and how we will deal with such a complaint.

PRIVACY POLICY QUICK REFERENCE

- We do not sell or give your personal information to marketers.
- We will use your personal information to provide you with our services.
- We may use your information to offer services to you (marketing). You can opt out of receiving marketing communications. While you have opted out we will not send marketing communications to you.
- We use cloud services for functions like email, data storage, retrieval and transfer. The computers providing these services (and hence your personal information) may be overseas.
- We use Australian and overseas contractors in USA, India and The Philippines, and your personal information may be disclosed to those contractors. Those contractors only use the information in providing us services, and are legally bound to keep personal information confidential.

PRIVACY CONTACT INFORMATION

Please direct any privacy related queries in writing to "The Privacy Officer, Sudo Staff" at privacy@sudostaff.com.

PRIVACY POLICY

This document sets out the detail of our policies for the management of personal information.

Our privacy policy may change from time to time. The current version of our privacy policy is the version published on our website at: www.sudostaff.com

If you are concerned that the personal information we hold about you may be inaccurate, or that we have breached our obligations to you under this privacy policy, please contact our Privacy Officer.

WHAT IS 'PERSONAL INFORMATION'?

The Privacy Act 1988 defines personal information as:

"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."

We may hold information that does not constitute personal information. This Privacy Policy applies only to personal information, as defined.

WHAT PERSONAL INFORMATION DO WE COLLECT AND HOLD, AND HOW DO WE COLLECT IT?

We keep records of our communications with or on behalf of our customers, and with suppliers, contractors and potential customers, suppliers and contractors. Any information supplied to us, by any means, including personal conversations, written communications (including via electronic means), or the supply of documents (including electronic documents) is routinely retained as a record. These records include some or all of: names, addresses (including street, postal, email, telephone and other communication methods), date of birth, and photographic identifiers.

We prefer to obtain personal information directly from the person about whom the information relates. We may obtain personal information from another party whom we reasonably consider is likely to provide a reliable source of information about the person. Examples of this may include other staff and contractors working in or for a customer's business.

We may collect personal information from data collected during the course of visits to our website and from your communications with us (including email, text chat, telephone or paper communications).

WHY DO WE COLLECT INFORMATION?

We only collect personal information when that information is necessary for one or more of our functions or activities. The principal functions and activities for which we collect personal information are:

- To identify you when you communicate with us
- To provide services to our customers
- To comply with any law or legal obligation (such as the obligation of disclosure of documents in court proceedings)
- The provision and/or marketing to the public of our services and products
- The management and efficient operation of our business, including credit management, staff training and development.

LAWS REQUIRING COLLECTION/DISCLOSURE OF INFORMATION

The law may require us to collect and retain information and to disclose that information in some circumstances. For example, we may be required by Anti-Money Laundering or Counter Terrorism Financing legislation to collect your personal information and to disclose that information to Australian government agencies.

We will collect and disclose information in order to comply with any such laws. We may provide information to government agencies even when not compelled at law to do so.

CONSEQUENCES OF NON-DISCLOSURE

If you do not provide us with the information we ask for, we may not be able to properly carry out our functions or activities. This may mean that you may not receive, or continue to receive, the service you have asked us to provide.

USE AND DISCLOSURE OF PERSONAL INFORMATION

We use and disclose personal information in the course of providing services to our customers, to assist our customers in achieving their goals and to remain in compliance with the law. We also use personal information in the course of our own business, including to enforce obligations and collect amounts due to us from our customers.

We disclose personal information where required to do so by law. We may disclose personal information to Australian government agencies when those agencies request, even where we are not strictly compelled to do so.

We may also use personal information to offer you services we consider may be of benefit to you. We do not sell your personal information to any other party for marketing purposes. In the event we sell our business your personal information will be disclosed to the buyer. In that case the buyer will be legally required to protect your personal information as if you had given the information to them in the first instance.

Circumstances may arise in a particular instance in which we disclose personal information on another basis. We will not do so in breach of any duty of confidentiality which we owe to our customers.

CONTRACTORS

We use contractors to assist us to carry out our functions and activities, and those contractors may be given access to your personal information.

Any external contractors we use are legally required to keep your personal information confidential.

Examples of contractors who may have access to personal information are:

- Accountants and Auditors
- Information Technology providers
- Secretarial and Administrative Support providers
- Agents and/or consultants whom we engage:
 - to assist us in provision of services to our customers; or
 - to assist us in carrying out our business functions
- Financial Institutions used by us in our business
- Law firms, lawyers and barristers engaged by us
- Our Insurers.

OVERSEAS TRANSFER

We use cloud services for functions like websites, email, data storage, retrieval and transfer. The computers providing these services (and hence your personal information) may be overseas.

We use overseas contractors to enable us to provide our services to our customers and generally in operating our business. Those contractors have access to personal information we hold. Those contractors are legally required to keep personal information confidential. In particular, personal information is likely to be disclosed to contractors in United States of America, India and The Philippines.

TRANSFER OF BUSINESS

If we sell the business or form a new entity to carry on the business, the personal information we hold will be transferred to the buyer or new entity. The new entity will be required to protect the personal information as if they had originally collected it.

CREDIT REPORTING

We may provide some products and services to customers on credit terms. When we do, we may record and deal with personal information about consumer credit worthiness in connection with those arrangements.

We may collect, hold and disclose any types of credit-related personal information about an individual permitted under the Privacy Act, including:

1. name, sex, date of birth, driver's licence number, employer name and three most recent addresses;
2. the fact that the individual has applied for credit and the amount and type of credit and the credit limit;
3. confirmation of previous information requests to credit reporting bodies made by other credit providers, mortgage insurers and trade insurers;
4. details of the individual's credit providers;
5. start and end dates of credit arrangements, and certain terms and conditions of those arrangements;
6. permitted payment default information, including information about related payment arrangements and subsequent repayment;
7. information about serious credit infringements (e.g. fraud);
8. information about adverse court judgments;
9. publicly available information about the individual's credit worthiness;
10. certain insolvency information from the National Personal Insolvency Index; and
11. any credit score or credit risk assessment indicating a credit reporting body's or credit provider's analysis of your eligibility for consumer credit.

Where we collect credit-related personal information about you from a credit reporting body we may use that information to produce our own assessments and ratings in respect of your credit worthiness.

We may exchange credit-related personal information (including the information types described above) with credit reporting bodies to, where permitted by law:

1. assist those bodies to maintain information about you to provide to other credit providers for credit assessments;
2. assess a credit application made by you or an application to be a guarantor;
3. mortgage credit;
4. collect overdue payments; and
5. create assessments and ratings of your credit worthiness.

You have the right to request CRBs not to:

1. use your credit-related personal information to determine your eligibility to receive direct marketing from credit providers; and
2. use or disclose your credit-related personal information, if you have been or are likely to be a victim of fraud.

We may also exchange your personal information with debt collection agencies, debt buyers and persons authorised by you.

In some cases, we are subject to further obligations under the Privacy Act regarding credit-related personal information, and this Privacy Policy does not limit or exclude those obligations. Additional privacy consents and notifications may also apply where we provide credit.

HOW DO WE STORE PERSONAL INFORMATION?

We store our records primarily in cloud-based computer systems. The computer systems providing these cloud-based services may be anywhere in the world.

We utilise cloud storage systems for backup and for remote data access, and the computer systems providing these cloud storage services may be located anywhere in the world.

ACCESS TO PERSONAL INFORMATION

At your request, we will provide you with access to the personal information we hold about you. We may charge you a fee for the provision of the access.

We will not provide you with access where the *Privacy Act 1988* does not require, or provides an exception to, our provision of that access. We will not give you access to information where to do so would be in breach of an obligation of confidentiality that we owe to another person.

We will give you reasons if we decide not to provide you with access.

You must make a request for access to your personal information personally, and provide us with adequate identification before access is granted. Depending upon the nature and location of the information, we may require some time to obtain and collate the information before we are able to give you access to it.

DATA QUALITY

We strive to ensure that the information we hold is wholly accurate, complete and up-to-date. Whenever we become aware that this is not the case, we will update, complete or correct that information.

If you consider that the personal information we hold about you is not accurate, complete and up-to-date, please tell us. Unless we disagree, we will correct our information.

We will give you reasons if we decide not to correct our information. We will, at your request made in this instance, take reasonable steps to associate with the information a statement from you that you consider that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading.

GOVERNMENT IDENTIFIERS

We will not use as our own identifier of an individual, an identifier that the *Privacy Act 1988* prohibits being used for this purpose.

ANONYMITY & PSEUDONYMITY

It is impracticable to provide our services on an anonymous or pseudonym basis. We may require evidence of your identity in order to ensure compliance with the law and payment for our services. We will not provide you with services if you refuse to provide us with your real identity.

We are unable to supply our services on an anonymous basis or to individuals using a pseudonym.

COMPLAINTS

If you wish to complain that we have breached any of the Australian Privacy Principles that bind us, you may do so by writing to:

The Privacy Officer, Sudo Staff, at privacy@sudostaff.com

You should provide:

- A formal written notification of the detail of the complaint, including identification of the APP which you consider has been breached, and providing any supporting evidence establishing the breach;
- Identification documents for yourself satisfactory to us (we will require adequate photographic identification);
- Your contact details, including an email address and telephone number, so that we may contact you to clarify any aspect of your complaint.

We will investigate your complaint, and will respond to you in writing within a reasonable time. In the course of our investigation we may ask you to discuss the issues raised in your complaint. When we have completed our investigation, we will write to you with our decision.

If you remain dissatisfied after you have our decision, you may complain to the Australian Information Commissioner.

ALTERATIONS TO POLICY

We may alter the terms of this policy at any time. We will publish the current version of our Privacy Policy on our website at www.sudostaff.com.