

SOUTHERN CROSS PROTECTION PRIVACY POLICY

Southern Cross Protection Pty Ltd ("SXP") ABN: 93 094 077 255

Purpose

This Policy sets out how Southern Cross Protection Group, collects, stores, uses and discloses personal information in accordance with the Australian Privacy Principles ("Principles") contained in the Privacy Act 1988.

The Principles govern the use of "personal information", which is information or an opinion about an identified individual who is reasonably identifiable. It need not matter that the information is correct or not or whether it is recorded in a material form or not.

1. Scope

This privacy policy describes the information that the Privacy Act required us to communicate to all of our customers. We hope it helps you understand how we handle your personal information and deliver the protection that the Privacy Act affords. Please refer to this for future reference.

2. The Group

In this document "The Group" refers to Southern Cross Protection Pty Ltd (ABN 71 164 506 656) and subsidiary Companies. The Group provides customer service, advise, security, guards, accesses risk, installs, monitors, services and responds to a range of security alarm systems and related products in Australia through its appointed with our own staff or licensees.

3. Your Personal Information

Personal information held by The Group about you may include:

- name;
- gender;
- date of birth;
- address;
- telephone numbers;
- e-mail address;
- purchasing details;
- driving licence number and state;
- ABN;
- alarm codes;
- warranty and service transaction information provided by our dealer network, affiliates or third parties;
- employment application information; and
- any other relevant information.

If you choose not to provide us with your personal information, we may not be able to provide you with the services you require, or the level of service on which we pride ourselves.

4. How We Collect Personal Information

The Group collects personal information in a number of ways, including:

- directly from you, when you provide information by telephone, electronic messages (including email and SMS) or in company documents you may complete and send;
- directly from you, via our internet site (requests for information);
- from your agents or representatives who act on your behalf;
- from competition entry forms or at our promotional activities or sponsored events;
- from third parties we contract to collect and/or manage data on our behalf;
- from third parties who you have asked or permitted to provide your personal information (including those parties from whom you purchase goods and services);
- from marketing organisations, including through the use of purchased lists;

- from industry databases;
- from publicly available sources such as the Internet and telephone directories; and
- from law enforcement, dispute resolution, statutory and regulatory bodies.

5. Website Cookies

We may collect cookies from you about your visit to our website to help us to improve our website. Cookies are small information files which are sent to your computer's hard drive or mobile device when you visit a website and it will recognise your device on future visits, for example, we may collect the time of your visit, whether you have visited our website previously, whether you used a search engine to find us and some geographical information. For information on disabling these cookies, please go to the privacy section within your browser.

We may also use analytical web tools such as Google Analytics to collect visitor information for us to better understand how to improve our products and services for you. In addition to the session cookie, Google Analytics uses other data collection methods such as appending query strings to an image request. We store the data generated by Google Analytics securely and do not share it with third parties.

We also use other external service providers for the following purposes:

- for web hosting services for this website; and/or
- to gather non-personal information (using cookies) in order to evaluate the website's effectiveness, for example online marketing activities.

6. How We Use Your Personal Information

Your personal information may be used in order to:

- provide and market our products and services and those of our related companies (whether directly or through our related companies);
- communicate to you in relation to our products, services and our promotional activities;
- purchase from you;
- support your purchase through warranty (whether directly or through our dealerships);
- comply with our legal obligations;
- monitor our performance and to help us manage our services;
- identify and contact individuals who do business with us;
- train our employees, agents, dealers and representatives;
- conduct customer and market research and analytics to improve the quality of our products and services;
- assess and process employment applications and manage employment issues; and
- handle complaints and disputes; and detect, investigating and pending fraud.

We may contact and communicate with you either via telephone, post, facsimile, email or SMS.

7. When We Disclose Your Personal Information

We may disclose your personal information to organisations outside of The Group. These organisations may include:

- our appointed licensees;

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- outsourced service providers who manage services and alarm response contractors;
- customer research;
- financial services and insurance;
- mailing systems, direct marketing and market research;
- government, regulatory, and law enforcement authorities and organisations, as required or authorised by law;
- our related body corporates;
- the agent(s) of any of those entities referred to above; and
- our advisors (including legal and accounting advisors).

Those entities are not authorised by us to use personal information for anything other than the purposes for which we supplied that information to them. We may also disclose personal information where you consent to us doing so. That consent may be written, verbal or implied from your conduct.

8. Disclosure to Overseas Recipients

Our related entities and some of our service providers (including information technology service providers) may be located overseas and, as a result, personal information collected and held by The Group may be transferred overseas. The countries in which these recipients may be located will vary from time to time.

9. How We Hold and Store Your Personal Information

The Group may hold your personal information in a number of ways, including:

- in our computer systems or databases, which may involve storing data on storage or computer systems provided by third party suppliers;
- in paper records; and/or
- in telephone recordings.

Where the information has been collected from our or your agent, or our service providers or dealerships, they may also hold copies of your personal information.

We may combine personal information we receive about you with other information we hold about you.

The Group will store your personal information in a security environment. It is protected by a combination of physical and technological measures. We have taken all reasonable steps to carefully protect your data from loss, misuse, unauthorised access or disclosure, alteration or destruction. If you want more information about the way we manage the information we hold please contact us as we would be happy to provide you with further information on our processes. Our contact details can be found at the end of this document.

10. Help Us to Ensure We Hold Accurate Information

The Group takes reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date. However, the accuracy of that information depends to a large extent on the information you provide. We recommend that you:

- let us know if there are any errors in your personal information; and
- keep us up to date with changes to your personal information such as your name and address.

11. You Can Access Your Personal Information

You have a right to access your personal information, subject to some exceptions allowed by law. If you would like to access your

information, please let us know. You may be required to put your request in writing for security reasons and in some circumstances we may need to charge a fee for searching for and providing access to your information.

12. How to Contact Us

If you wish to notify us of your new contact details, update your personal information, opt out of direct marketing, make a complaint about a breach of privacy or have any questions in relation to the accuracy of your information of privacy, please contact The Group:

Telephone: 1300 136 102 OR Email: enquiries@sxprotection.com.au

13. Making a Complaint

If you believe that we have interfered with your privacy in our handling of your personal information, you may lodge a complaint. We will attempt to resolve your complaint in accordance with our internal complaints resolution process.

We may make changes to this Privacy Policy from time to time for any reason. We will publish changes to this Privacy Policy on this website.

Revision 1 – June 2014

Notes:

1. *Please inform The Group if you require assistance for the visually impaired, are from a non-English background or require other assistance with this Policy document.*
2. *If online publication of this Policy is not appropriate for your needs please contact us to discuss an alternative option.*