



# PRIVACY STATEMENT




<b>Document Classification:</b>	<b>Security Level 4</b>
<b>Document Ref.</b>	<b>ISMS-DOC-04-2</b>
<b>Version:</b>	<b>4</b>
<b>Dated:</b>	<b>30 August 2022</b>
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<b>Document Owner:</b>	<b>Operations</b>



## Revision History

Version	Date	Revision Author	Summary of Changes
1	3 September 2019	Christopher Louw	Initial Draft
2	30 October 2019	Mandii Versaci	Final
3	30 August 2021	Mandii Versaci	Reviewed
4	30 August 2022	Faa'iqa Dumanas	Reviewed

## Approval

Name	Position	Signature	Date
Christopher Louw	Chief Operations Officer		30/08/22



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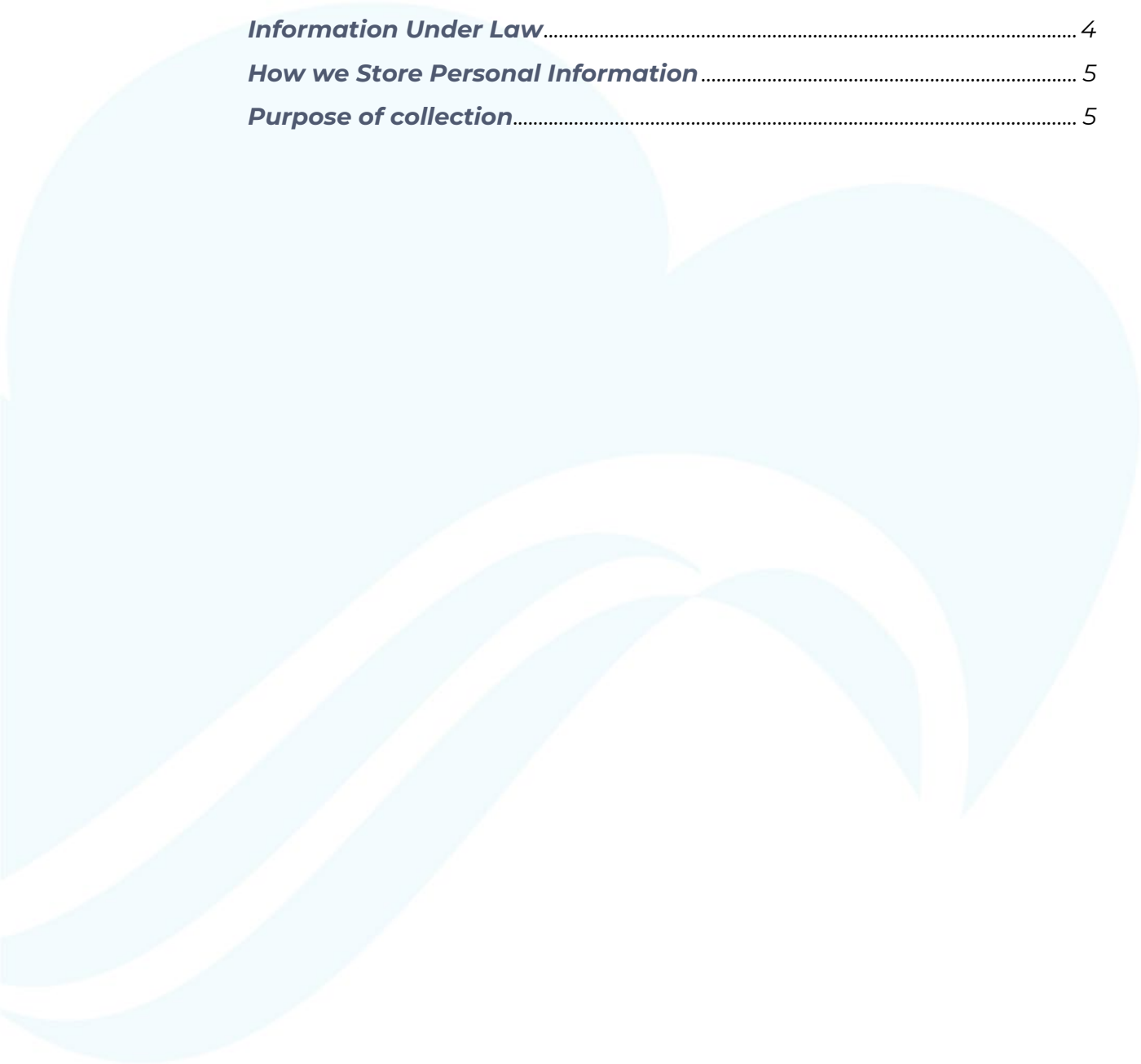
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# Privacy Statement

Claratti Workspace is committed to protecting your personal privacy. This Privacy Policy tells you how we collect, store, and use and disclose your personal information. We encourage you to read this policy carefully so that you understand our information handling practices.

## Claratti Workspace

Claratti Workspace refers to Intelligent IP Hosting Pty Ltd trading as Claratti Workspace Pty Limited.

## Information we Collect

In order to provide our customers with our products and services, we may collect and use personal information about you and others. If we are not provided with all the personal information we request, we may not be able to supply our products and services.

The type of information we collect includes names, addresses, phone numbers, email addresses, profession or occupation, credit card details (if you buy products or services from us) and other contact details. We also collect resumes and work history details from potential employees.

We do not normally collect or store 'sensitive information', as defined in the Privacy Act 1988 (eg. information about ethnic origin, religious beliefs or health). However, where we are required to and it is practicable to do so, we will seek your consent before collecting your sensitive information and inform you of the purpose at the same time.

## Information Under Law

Claratti Workspace may be required to collect personal information under the Telecommunications Act 1997 and laws made under it. Information relating to an individual or a communication to which an individual is party, may be required to be collected under the 'data retention' provisions of the Telecommunications (Interception and Access) Act 1979 ('Data Retention Law').

Data Retention Law information includes subscriber and account details, telecommunication device details, the source and destination of the communications, the date and time of communications and connections, the type of communication or service and location details.



## How we Collect Personal Information

Generally, we collect an individual's personal information from that individual. For example we collect personal information when you make an enquiry about our products and services via our website, or when you order hardware or software products through our Online Store.

However, occasionally we may also collect personal information from someone other than the individual. For example, we may collect your information from an existing customer, when they tell us that you may be interested in our products or services, or from companies with whom you work, other organisations with whom you have dealings, information service providers or from publicly maintained records.

## How we Store Personal Information

Access to personal information is limited to those of our personnel who specifically need it to carry out their business responsibilities.

We take all reasonable steps to keep secure any personal information which we hold about you and to protect your personal information from loss, misuse or unauthorised alteration. Any personal information you provide to us, or collected from you, electronically is stored on secure servers and encrypted where required under the Data Retention Law. Our employees are contractually bound to respect the confidentiality of any personal information held by us. We also maintain physical security procedures to manage and protect the use and storage of records containing personal information.

To help us protect your privacy, you must maintain the secrecy of the access credentials (i.e. user name and password) you use to access and use our website.

## Purpose of collection

We collect personal information so we can:

- identify our customers, potential customers and their representatives;
- inform you or others of any technology solutions we think may be of interest to you or them;
- inform you or others about our products and services and the benefits of using our products and services;
- provide you or others with information about offers or other benefits that may become available;
- seek your opinion or comments about our products and services;
- carry out billing and/or debt recovery activities;
- carry out our management, administrative, quality assurance and complaint handling activities in a professional and efficient manner;

- deliver customer service and resolve problems our customers may experience with their information technology systems and networks;
- consider the suitability of potential employees for employment opportunities; and
- Develop and implement solutions to improve our products and services.
- We may need to comply with the law, including the Data Retention Law.

## Use and Disclosure

We use and disclose the personal information we collect for the purposes indicated above, and for other secondary purposes.

We usually disclose the personal information we collect to our related entities and to third party service providers and contractors, who help us supply our products and services. For example, we may disclose personal information to technology vendors, to help resolve technical problems, or to third party contractors to install equipment on site.

We may be required, as a result of contractual or statutory obligations, to disclose personal information we collect to auditors, who conduct audits of our business and services, or to government agencies, like the Australian Prudential Regulation Authority or to authorised agencies under the Data Retention Law.

Except where indicated above, we will not use or disclose personal information unless:

- the individual concerned has consented to the use and disclosure;
- the third party is a person involved in a dealing or proposed dealing (including a sale) of all or part of our assets and business;
- the third party is your creditor, banker or financier; or
- The disclosure is permitted, required or authorised by or under law.

## Marketing

We may use personal information to advise the individual concerned of new products and marketing technology solutions that we think may be of interest to them. This may include product and service offerings, newsletters and general information about us.

Those who prefer not to receive information about our products and services can ask to be removed from the relevant circulation list by contacting contact us, using the details listed below.

We never disclose personal information to a third party for the purpose of allowing them to direct market their products or service on an individual, unless individuals have expressly consented to that disclosure.

## Access

If at any time you want to know what personal information we hold about you, you are welcome to request access to that information by contacting us, using the details listed below. However where:

- the access impacts on the privacy of others;
- the request for access is frivolous or vexatious;
- there are existing or anticipated legal proceedings; or
- such access can be denied under law or by a law enforcement agency, we may deny your request for access.

If we deny your request for access, we will let you know why.

## Quality & correction

At all times we strive to ensure that the information we hold about you is accurate, complete and up-to-date. If at any time you believe the personal information that we hold about you is incorrect, incomplete or inaccurate, you should let us know. We will use all reasonable efforts to correct the information.

## Website & cookies

To ensure we are meeting the needs and wants of our website users, and to develop our online services, we may collect aggregated information by using cookies or similar electronic tools.

A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the web server that you have returned to a specific page. For example, if you register with Claratti, a cookie helps the Claratti Workspace website to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the same Claratti Workspace website, the information you previously provided can be retrieved, so you can easily use the Claratti Workspace website features that you customised.

You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Claratti Workspace website services or web sites you visit.

We do not use this technology to access any personal information of a user in our records and a user cannot be personally identified from a cookie.



## Changes to our Privacy Policy

As our business evolves our business processes and policies will be reviewed and may be revised. We may change our Privacy Policy at any time. We will notify you of any change by posting an updated version of our Privacy Policy on our website.

## Complaints

We are committed to constantly improving our procedures so that personal information is treated appropriately. If you feel that we have failed to deal with your personal information in accordance with this policy or in accordance with the Australian Privacy Principles, please contact us, using the details listed below, so we have an opportunity to resolve the issue to your satisfaction.

We will log your complaint and our privacy officer will:

- listen to your concerns and grievances;
- discuss with you the ways in which we can remedy the situation; and
- Put in place an action plan to resolve your complaint and improve our information handling procedures if appropriate.

## Disclosure to overseas recipients

We are likely to disclose personal information to staff, employed by our related body corporate in India, in order to deliver particular products and services to you.

We may use third party service providers located outside Australia, to install or maintain our equipment on your site, in order to deliver data services to you.

## Contact us

If you require more detailed information about our information handling practices or if you have any concerns about our handling of your personal information, please let us know by contacting us at:

Chief Operations Officer

1300 073 085

We will endeavour to respond to your concerns as quickly as possible.