# **Privacy Policy**

RM Safe Pty Ltd ACN 691 512 179 (RMS) recognises the importance of privacy, and we take your privacy and compliance with the Privacy Act 1988 (Cth) (Act) and the Australian Privacy Principles (APPs) very seriously.

The use and navigation of RM Safe's website at https://www.rmsafe.com/ (the Website), allows for the collection of certain information about you and your use of the Website. We set out in this Privacy Policy the information about you that RMS collects through your use of the Website and how that information is stored and used by RMS.

Please review the Website regularly as this Privacy Policy may change from time to time particularly where the way in which we collect and use information changes. You can always obtain a copy of the Privacy Policy from the Website (here: https://www.rmsafe.com/privacy) or you may request a copy of the Privacy Policy from our Privacy Information Officer by emailing the officer at info@rmsafe.com.

If you are an employee of an RMS client, please refer to the section headed 'Employee Information' below.

#### WHEN WE COLLECT INFORMATION

The types of information RMS collects will depend on the nature of your dealings with RMS or the external law firms or providers to. We only collect personal information if it is reasonably necessary for one or more of RMS's functions or offerings provided to you. RMS will generally collect personal information about you when you:

- Provide us with your personal information such as when you:
  - Use our online booking service to book a meeting with a third party external solicitor;
  - Use our online booking service to book a meeting with RMS employees;
  - You subscribe to our newsletter/mailing list through our Website:
  - You register for a seminar or other event;
  - o You subscribe to a subscription service offered by RMS;
  - You engage with us via our social media accounts:
  - Apply for employment with RMS; and
  - o Engage in business dealings with RMS.
- Indirectly through the Website, such as when you:
  - o Access documents and information from the Website.
- Provide personal information through a webform on the Website;

By 'personal information', we mean information about an individual which includes their name, email, address, telephone number, residential or business address, bank account details, payment information, and job descriptions and so on. You are not required to provide us with personal information however we may be unable to deliver our services to you without being provided with personal information.

#### INDIRECT COLLECTION OF INFORMATION

When you browse the Website, we track information about your use of the Website. This includes dates and times you accessed the Website, the IP address from which you accessed the Website, the kind of device you used, the web pages you accessed and documents and information you downloaded

This information is collected and used by us to understand how our Website is being used so we can make available the best and most relevant services and information.

To allow us to collect this information, the Website, online services and emails we use and send may contain cookies. The cookies allow us to provide continuity of access to our services and to collect and track which pages and information users are accessing so we can continuously improve our offerings and to ensure our marketing is more targeted with regards to topics and information.

Non-identifiable data is collected by these third-party service providers which means we will not be able to identify individual users or know your IP address belongs to you specifically.

You may disable cookies or opt-out of Google Analytics by disabling or limiting tracking or advertising tracking in your web browser, disable JavaScript or opt-out via Google. In doing so, it may be that some of the Website's features will not be available.

## MONITORING OF TELEPHONE CALLS

When RMS receives or makes phone calls with you, the calls are recorded for security, record keeping, training and quality assurance purposes. These recordings are retained in accordance with our retention periods identified below.

#### HOW WE USE YOUR PERSONAL INFORMATION

RMS may use personal information collected to:

- communicate with you about products, services or information that we consider to be significant or useful to you or your business.
- market to you to inform you about our offerings or offerings from specific third parties that we may partner with from time-to-time.
- improve our service and product offerings and the Website.
- manage our systems administration and any subscription you have with RMS; comply with our policies and procedures.
- consider your suitability for employment with RMS.

If you do not wish to receive information with respect to our products, services or information, then you may opt out by sending an email to info@rmsafe.com advising that you wish to opt-out of our direct marketing service.

#### **DISCLOSURE TO EXTERNAL PARTIES**

RMS may disclose your personal information and information collected indirectly to entities outside of RMS as follows:

- To consultants we may engage from time-to-time to perform marketing services to RMS.
- To regulators, law enforcement bodies, government agencies, the courts or tribunals of Australia (Federal and State and Territories) where it is necessary to comply with the laws, court or tribunal orders or directives.
- To third party payment processors and service providers, such as Stripe.

It is important that you know and understand that RMS is not in the business of providing legal advice. You should seek advice via external law firms.

Other then as set out above, RMS will not use or disclose your personal information for any other purpose without your consent or where such disclosure is required under the Act and/or the APPs or at law.

If RMS does engage an external service provider, then RMS will take reasonable steps to ensure those external service providers comply with their obligations under the Act and the APPs when handling, using or storing your personal information.

### HOW WE RETAIN AND STORE YOUR PERSONAL INFORMATION

RMS will keep your personal information for the duration of any ongoing business relationship we have with you and where that information is necessary for us to provide ongoing services to you or to comply with applicable legal or record keeping requirements.

Following the period for record keeping required by law, we will delete or anonymise your personal information.

At all possible times, RMS has ensured (and will continue to ensure) that it, and its service providers, store your personal information securely and, where possible, within Australia. However, some of our service providers, contractors or agents may receive or store your information at overseas locations. Where we transfer any of your personal information outside of Australia, we will send them through the use of a number of measures to ensure those transfers are secure and your information is protected.

We will store your information in physical form and/or electronically. We use firewalls and secure databases with password protection for all our systems to keep your personal information safe and secure where the information is stored electronically. However, RMS cannot and does not guarantee the security of personal information. That is because the internet and electronic communications are prone to attacks by cyber criminals, and they are therefore not secure. Please keep this in mind when sending us emails or communicating with us via electronic means as this will all occur at your own risk.

## **ACCESS AND AMENDMENT REQUESTS**

You have several rights under the Act, including a right to access and request correction or updating of your personal information. If you wish to obtain access to, amend or update, any personal information that RMS collects about you, you may do so by contacting the following officer:

Privacy Information Officer info@rmsafe.com.

RMS will respond to such requests within a reasonable timeframe in accordance with the APPs. We may:

- seek payment of a fee where a request for a copy of the personal information is requested
- request verification of identity from the person requesting access to the personal information;
- refuse to provide the personal information if we are not satisfied of authority of the person requesting the personal information or for any other reason provided for in the APPs

#### **COMPLAINTS**

Any complaint about the use, storage or management of your personal information can be made to RMS's Privacy Information Officer. You should

provide details of your complaint so we can understand the complaint and, where possible, provide documents relevant to the complaint.

Within 2 days, you will receive confirmation of receipt of the complaint and the complaint will then be investigated. You will be notified of the outcome of the investigation into your complaint within a reasonable timeframe in accordance with the APPs.

If you remain unsatisfied with the outcome, you may seek a review by the Privacy Commissioner at the Office of the Australian Information Commissioner (see http://www.oaic.gov.au/ for further information).

#### **How to Contact us**

All questions and concerns about this Privacy Policy or the handling of personal information may be addressed with RMS's Privacy Information Officer through the following contact details:

Privacy Information Officer info@rmsafe.com