

## Privacy Policy

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## 1. Scope

This Privacy Policy applies to personal information collected, used and disclosed by coNEXA TopCo Pty Ltd ACN 616 144 471 and all subsidiary companies of coNEXA TopCo Pty Ltd (referred to as “coNEXA” “we” or “us”).

coNEXA recognises that the privacy of your personal information is important to you and is committed to respecting its obligations to protect the privacy of the personal information of individuals with whom it deals in accordance with the Australian Privacy Principles (“APPs”) as Schedule 1 to the *Privacy Act 1988* (Cth) (“Privacy Act”).

By using any of our products or services, visiting our website or giving us your personal information, you agree to your personal information being collected, stored, used and disclosed as set out in this Privacy Policy.

## 2. Collection

### 2.1 What personal information does coNEXA collect and hold?

We only collect personal information that is reasonably necessary for our functions or activities or is required or permitted by law.

We collect personal information including:

- names, addresses, e-mail addresses, phone numbers, other contact details, payment details, occupation and other information to assist us in conducting our business, providing and marketing our products and services;
- photos in public areas of our buildings for safety and security purposes;
- information about staff and directors (including qualifications, employment history, criminal history and medical history if you are applying for employment with us or are employed by us, as well as bank account and superannuation account details and a tax file number if you obtain employment with us), as required in the normal course of human resource management and the operation of a business; and
- information about our current and previous suppliers and clients with whom we have dealings.

We will only collect sensitive information (eg information about an individual's race, ethnic origins, political opinions or association, trade or professional associations and memberships, union membership, criminal record or health information):

- if you have consented to us doing so and it is reasonably necessary for one or more of our functions or activities – for example, as part of information collected about directors and employees for company, and human resource management purposes; or
- where required or permitted by law.

### 2.2 How and from whom does coNEXA collect personal information does?

We only collect personal information by lawful and fair means.

Wherever reasonable and practicable, coNEXA collects personal information directly from the individual to whom the information relates or their authorised representative. This is typically as a result of, and in connection with, our ongoing business relationship with those individuals.

For example, we may collect personal information when you:

- request or acquire a product or service from us;
- provide a service or product to us;
- apply for employment with us;
- communicate with us via our website, by e-mail, telephone or in writing;
- attend face-to-face meetings, interviews and telephone calls with us;



- provide a business card; or
- fill out forms, including as part of acquiring a product or service from us.

We sometimes collect personal information from a third-party or from a publicly available source, but only if it is unreasonable or impracticable to collect that personal information from the individual directly, and where required or permitted by law.

We hold personal information in hard copy and electronic files.

### 2.3 Collection of information from coNEXA websites

When using any coNEXA website you may voluntarily disclose personal information to us. Our server may automatically record details such as your internet address, domain name if applicable, and the date and time of your visit to our website. This information is used for internal purposes only, including statistical purposes.

We will not try to identify users or their browsing activities except as necessary to investigate or report any suspected unlawful activity, as required or authorised by law or as reasonably necessary for the activity of an enforcement body.

coNEXA websites may use cookies, which may collect personal information. Cookies are pieces of data stored on your browser that record information on your use of the coNEXA websites, such as details of your server and your browsing activity and send the information to the server. We use these cookies to monitor usage of the coNEXA websites only. You may be able to change the settings of your browser so that cookies are not accepted generally or that you are provided with options to accept or reject them as they are sent to your browser. You might not be able to use the full functionality of the coNEXA websites by refusing the use of cookies.

### 2.4 Why do we collect the personal information?

We collect the personal information:

- necessary for us to provide you with the products and services you have requested from us;
- for marketing purposes and to provide you with information about products and services that may be of interest to you;
- to improve the products and services we provide; and
- to enable us to conduct our business, including meeting our legal and regulatory obligations.

Our ability to meet our obligations to you, to process an application or to otherwise deal with you may be adversely affected if you do not provide us the requested personal information or if the information you provide us is incomplete or inaccurate.

## 3. Use and disclosure

### 3.1 How do we use your personal information?

We use personal information:

- in the ordinary course of conducting our business. For example, supplying or acquiring products and services; responding to individuals' enquiries and feedback; providing information about our events, news, publications and products and services that may be of interest to individuals; and maintaining a relationship with individuals;
- for market research and product and service development, so that we are able to better understand our customers' needs and tailor our future products and services accordingly;
- in performing general administration, reporting and management functions. For example, invoicing and account management, payment processing, risk management, training, quality assurance and managing suppliers;
- for employment-related purposes, such as recruiting and providing services to staff;
- as part of a sale (or proposed sale) of all or part of our business;



- for other purposes related to or in connection with our business, including meeting our legal and contractual obligations to third-parties and for internal corporate governance purposes; and
- as required or permitted by law.

### 3.2 Disclosure of personal information

We will only disclose personal information for the purpose for which it was collected or in the following circumstances:

- to people and organisations engaged by us to provide products or services, or to undertake functions or activities, on our behalf. For example, external service providers, processing payment information, managing databases, marketing, research and advertising;
- to our contractors, business partners, joint venturers, potential buyers, partners or agents;
- to our external advisers, eg where disclosure is reasonably required to obtain advice, prepare legal proceedings or investigate suspected unlawful activity or serious misconduct;
- where required or authorised by law; and
- where you consent to the disclosure.

We will only use or disclose an individual's sensitive information for the purpose for which it was initially collected or for another purpose only with your consent or if required or permitted by law.

### 3.3 Cross border disclosure of personal information

We may deal with third-parties, such as service providers, that have part of their operations located overseas. As a result, your personal information may be disclosed to a recipient in a foreign country. We have an obligation ('the Obligation') to take reasonable steps, in the circumstances, before disclosing personal information to an overseas recipient to ensure that the overseas recipient does not breach privacy laws in relation to that information. Where reasonable in the circumstances, our contracts with overseas recipients oblige them to comply with the APPs and the Privacy Act. If you consent, to the disclosure of your information to overseas recipients:

- the Obligation does not apply; and
- we will not be liable to you, and you will not be able to seek redress against us under the Privacy Act for any breach of the APPs by those overseas recipients.

By supplying your personal information to us, you consent to the disclosure of your personal information to overseas recipients and agree that the Obligation does not apply. You acknowledge, and agree to, the risk associated with the disclosure of your personal information to overseas recipients.

## 4. Quality and security of personal information

We will take reasonable steps to ensure that all personal information we hold is:

- accurate, complete, up-to-date, relevant and not misleading;
- stored in a secure environment; and
- protected from misuse, interference and loss as well as unauthorised access, modification or disclosure.

If any of your details change, please let us know as soon as possible by using the contact details below so we can maintain the accuracy of your personal information.

## 5. Access of personal information

You can contact us (see 'how to contact us') to access the personal information that we hold about you. We will comply with your request within a reasonable period, but no longer than 20 days, after the request is made unless access may be denied under the Privacy Act or the APPs. If we deny you the requested access, we will advise you about the reasons (unless it would be unreasonable to do so).



No fee applies for requesting access to information we hold about you. However, we reserve the right to charge a reasonable fee for providing you access.

## 6. **Correction of personal information**

You may contact us (see 'how to contact us') to correct personal information that we hold about you if it is inaccurate, incomplete, out-of-date, irrelevant or misleading. We will deal with your request within a reasonable period, but no longer than 20 days, after the request is made.

If we refuse to correct your personal information as requested, we must:

- notify you in writing of the reasons for the refusal (unless it would be unreasonable to do so) and how to complain of the refusal; and
- upon request from you that we associate a statement that the information is inaccurate, incomplete, out-of-date, irrelevant or misleading, take such steps as are reasonable in the circumstances to associate such a statement so that it will be apparent to users of the information.

## 7. **Pseudonyms and anonymity**

Where lawful and practicable, we will give individuals the option of interacting with us anonymously or using a pseudonym.

## 8. **Making a complaint**

You may contact us (see 'how to contact us') to complain about a breach of this Privacy Policy or the APPs. coNEXA will handle any complaints promptly in a professional manner by referring the matter to inhouse Legal Counsel. coNEXA will endeavour to remedy any breaches of this Privacy Policy or the APPs and put procedures in place to ensure any such breaches are not repeated. If you are not satisfied with the way coNEXA has handled a complaint, you can make a further complaint to the Office of the Australian Information Commissioner.

## 9. **Availability of Privacy Policy and amendments**

This is our current Privacy Policy, available on the coNEXA website and in hard copy upon request.

We may review this Privacy Policy or any part of it from time to time. We encourage you to review the coNEXA website at [www.conexa.com](http://www.conexa.com) regularly to ensure that you are aware of our current Privacy Policy.

An individual's continued use of our website, products or services, requesting our assistance, or the provision of further personal information to us after this Privacy Policy has been revised, constitutes the individual's acceptance of the revised Privacy Policy.

## 10. **Links to other websites**

The coNEXA website may contain links to third-party websites. We are not responsible for the content or material contained in, or obtained through, any third-party website or for the privacy practices of the third-party website. We suggest that you review the privacy policy of each website that you visit.

## 11. **How to contact us**

For further information contact us at:

Legal Counsel  
coNEXA Infrastructure Partners  
Suite 1005, 147 Pirie Street  
Adelaide SA 5000  
Phone (08) 7999 8555  
Email: [legal@conexa.com](mailto:legal@conexa.com)

Or visit <https://www.oaic.gov.au/privacy>