

1. Policy Statement

Alliance Electric Pty Ltd (trading as Alliance SI) ABN 63 001 524 867 (**Alliance SI**) is committed to protecting personal information in accordance with the Australian Privacy Principles (**APPs**) and the Privacy Act 1988 (**Privacy Act**). This Privacy Policy (**Policy**) outlines how Alliance SI manages the collection, holding, use, disclosure, and protection of personal information.

Alliance SI is committed to keeping personal information secure and using established and compliant levels of procedure, technology and staff awareness to ensure the appropriate management of personal information it collects, holds, uses and discloses.

For the purposes of this Policy, Alliance SI includes Alliance Services Pty Ltd ACN 687 475 716 and Alliance Electric WA Pty Ltd ACN 689 408 713.

2. Purpose

This Policy aims to ensure that personal information is managed in a transparent and secure manner, to safeguard the privacy rights of individuals and to maintain compliance with legal obligations.

The purpose of this Policy is to ensure that during Alliance SI's provision of services, as well as its activities and operations, Alliance SI manages and protects personal information in accordance with the Privacy Act and the APPs. This Policy adopts the relevant definitions outlined in the Privacy Act and the APPs.

This Policy outlines the circumstances in which Alliance SI collects personal information, how it holds and uses that information, to whom it discloses that information, and when, and how it manages requests to access and/or change that information.

Alliance SI may, from time to time, review and update this Policy to take account of new laws and technology, changes to our operations and practices and to make sure it remains responsive to any changes in the provision of our operations.

Under the Privacy Act, the APPs do not apply to an employee record between Alliance SI and its employees. Accordingly, this Policy does not apply to Alliance SI's collection, holding, use and disclosure of employee records if directly related to a current or former employment relationship between Alliance SI and an employee.

Alliance SI provides network infrastructure, specialising in designing, installing, and maintaining mission-critical data, electrical, and communications systems. Alliance SI provides data centre fit-outs, structured cabling, and network rollouts.

This Policy applies to those services. However, this Policy also extends to other areas of Alliance SI's operations, including recruitment, engagement of contractors and its business and administrative functions including marketing.

Before we get into the detail, we'd like to define a few terms that will hopefully make it easier for You to understand this Policy:

- Personal Information is information or opinion about an individual from which they can be reasonably identified. This Policy applies the definition of 'Personal Information' that appears in the Privacy Act.
- On occasions people other than an individual may provide Personal Information about an individual. Depending on the circumstances, Alliance SI may collect Personal Information from or about or in

relation to an individual in their capacity as a website visitor, customer, subcontractor, supplier, vendor, job applicant, director or officer, or in some other capacity detailed in this Policy.

- When we refer to “Your information”, we are referring to Your Personal Information.
- The Privacy Act defines some types of Personal Information as ‘Sensitive Information’ and this Policy applies the definition in the Privacy Act. Sensitive Information includes information about a person's race, political or religious beliefs, sexual preferences, criminal convictions, membership of professional or trade associations or unions and biometric and health data. In the event Sensitive Information is required or collected, we would only collect it with Your consent (implied or expressed) and in accordance with the principles expressed in this Policy.

3. Scope

The obligations in this Policy apply to all Alliance SI employees, contractors, and third parties who may access or manage Personal Information on behalf of Alliance SI.

4. Policy Guidelines

4.1. Collection of Personal Information

The collection of Personal Information depends on the circumstances in which Alliance SI is collecting it but only if it is fair and reasonable to do so. In most situations, Alliance SI will collect Personal Information directly from the individual or from an entity that an individual has consented for that entity to provide the individual's Personal Information to Alliance SI.

We collect Personal Information for one or more of our functions or activities. These include:

- to provide You with access to and use of our platform, systems, products and services.
- to verify that the information You provide to us is correct.
- to protect You and us against fraud, prohibited or unlawful activity which may cause You or us harm in relation to our products or services.
- to maintain and develop our business systems, processes and infrastructure; and
- to meet legal and regulatory requirements
- for marketing, promotional and fundraising activities
- for invitations to attend events such as webinars, industry forums

4.2. When You visit our Website

When You access our website (<https://alliancesi.com.au/>) (**Website**) we may collect non-Personal Information in aggregate form, such as Your browser type, which pages of our site You access and Your IP address. We use this aggregate information to understand how our users use our Website.

There are many aspects of our Website, which can be viewed without providing any Personal Information to us. However, to receive services an individual is required to submit Personal Information, such as a name, phone number, postal and email address. Other information, such computer type and information about how the individual is using the Website may also be collected in that process.

We also use ‘cookies’. Cookies are temporary, small pieces of information sent to a website user's hard disk or stored by a user's browser. They can't run programs or deliver viruses, nor can they track your behaviour in alarming ways. Cookies help make Your browsing experience easier, by for example, remembering the information You previously entered. You can disable cookies through Your browser settings. Although most browsers are initially set to accept cookies, you may reset your browser to notify you when you receive a cookie

or to reject cookies generally. Most browsers offer instructions on how to do so in the 'Help' section of the toolbar.

The Facebook Pixel, LinkedIn Insight Tag and Google Analytics are all cookies used by Alliance SI, exclusively for the purpose of tracking which pages on the Website you have visited and for how long. These types of cookies are used to ensure we deliver content our users enjoy and find useful, as well as to create effective marketing campaigns. If you are on LinkedIn, Facebook or Instagram, they may result in you being shown our ads.

When making enquiries during visits to our Website including making submissions, your name, email, phone, IP address, usage data may be collected from you by Alliance SI marketing and IT staff. Personal Information may be collected via Website forms, cookies, and analytics tools. The purpose of collection of this Personal Information is to respond to enquiries, and for analytics, security, and marketing purposes.

4.3. Information we may collect

The Personal Information we will collect about You may include:

- information to identify You, including Your name, date of birth and contact details.
- government identifiers such as Your driver licence number.
- such other information we consider necessary to our functions and activities.

4.3.1. How we collect Personal Information

Wherever possible, we will only collect Personal Information directly from You (rather than someone else) unless it is unreasonable or impracticable to do. Often Personal Information is provided by an entity associated with an individual for example their employer, colleague, agent or representative.

Customers including clients and client staff (Customers)

If you enquire about or otherwise obtain our services, we may collect Personal Information about you for the purpose of providing services or facilitating support. This includes during billing/ accounts processes, account management, and compliance.

- Personal Information is collected from Customers from customer representatives, from an individual (a customer's employee) or authorised third parties (which can include recruiters, referees, subcontractors, and service providers). This is usually facilitated via file electronic file transfer, phone, in person meetings, email and software.
- Personal Information is collected by Alliance SI sales, delivery, finance, and support staff.
- Alliance SI collects names and contact details (phone, postal and email address), as well as financial information via financial transactions for services to be rendered and rendered, for the purpose of managing the relationship with Alliance SI. Collection occurs at the time of supply, including when Personal Information is modified via the use of software or electronic file transfer.

Subcontractors and subcontractor staff

Alliance SI may contract entities to provide services. If an entity provides services to Alliance SI, we may collect Personal Information about you for the purpose of facilitating the provision of those services. This includes for WHS compliance, service delivery, contractor management, billing/ accounts processes, account management, and compliance. Collection may occur during pre-engagement, onboarding, compliance checks, and accounting/ invoicing processes.

Alliance SI may collect Personal Information via software, electronic file transfer, contracts, forms and other agreements, licence systems, face to face meetings and interviews, notes, letters, emails, telephone calls and other communications, via our Website, via financial transactions and via use of its IT services including logs and email monitoring. Alliance SI uses Altor as part of onboarding processes. Collection may occur via information supplied by you, and via third parties including labour hire providers.

Personal Information collected may include name, address, email address, phone, licences, qualifications and financial details. Collection is undertaken by Alliance SI employees including in operations, project managers, WHS, and finance.

Suppliers and vendors

Alliance SI may contract suppliers and vendors to provide services. If an entity provides services to Alliance SI, we may collect Personal Information about you for the purpose of facilitating the provision of those services. This includes for procurement management, billing/ accounts processes, account management, and compliance. Collection may occur during pre-engagement, onboarding, compliance checks, and accounting/ invoicing processes.

Alliance SI may collect Personal Information via software, electronic file transfer, contracts, forms and other agreements, face to face meetings and interviews, notes, letters, emails, telephone calls and other communications, via our Website, via financial transactions and via use of its IT services including logs and email monitoring. Alliance SI uses Altor as part of onboarding processes. Collection may occur via information supplied by you, and via third parties including vendor representatives.

Personal Information collected may include name, address, email address, phone, and financial details. Collection is undertaken by Alliance SI employees including Alliance SI partner managers, project administrators and finance.

Job applicants/ Prospective Employees

If you enquire about or otherwise apply for employment, we may collect Personal Information about you for the purpose of managing that process. This includes for the purposes of recruitment assessment, employment suitability, workforce planning, and legal compliance. Collection may occur during enquiry, application, interview, reference check, and onboarding processes.

Alliance SI may collect Personal Information via software, electronic file transfer, applications, face to face meetings and interviews, notes, letters, emails, telephone calls and other communications, via our Website, via financial transactions and via use of its IT services including logs and email monitoring. Alliance SI uses Altor as part of onboarding processes. Collection may occur via information supplied by you, third party recruitment agencies and services as well as referees.

Personal Information collected may include name including preferred name, addresses, email address, phone, resume and employment history (and referee details), qualifications, licences, and right-to-work status, date of birth, gender, country of birth, nationality, and other contact details including emergency contact details, employment classification, government identifiers such as tax file number, financial information including banking details, salary, allowances, deductions, leave entitlements, employment information, superannuation details, and details of paid work, health information (including medical records, disabilities, immunisation details and psychological reports), professional memberships, and criminal records. Collection is undertaken by Alliance SI employees and authorised contractors (including HR, hiring managers).

Directors, Officers, and Key Business Contacts

Alliance SI may appoint and engage individuals in particular non-employee executive roles. If an individual provides such services to Alliance SI, we may collect Personal Information about you for the purpose of facilitating the provision of those services, and for governance, corporate administration and compliance purposes. Collection may occur during an appointment, or during governance activities.

Alliance SI may collect Personal Information via software, electronic file transfer, applications, face to face meetings and interviews, notes, letters, emails, telephone calls and other communications, via our Website, via financial transactions and via corporate records. Collection may occur via information supplied by you or via corporate records.

Personal Information collected may include name, address, email address, phone, governance history, qualifications, and role information. Collection is undertaken by Alliance SI executive and governance staff.

Alliance SI may collect contact details to provide information about its services, such as general updates. You have the option to opt out of these communications.

Children

We are committed to protecting the privacy of children. Our services are generally not designed for or directed to children. We do not collect personal information from any person we actually know is under the age of 18. In the online space particularly, parents or guardians are urged to participate in their children's exploration of the Internet and to teach their children about protecting their personal information while online.

4.3.2. Incomplete or inaccurate information

We may not be able to provide You with the products or services You are seeking if You provide incomplete or inaccurate information.

4.3.3. Sensitive information

In addition to the above conditions of collecting Personal Information, we will only collect Sensitive Information about You if it is fair and reasonable for one or more of our functions, activities and operations, and we obtain prior consent to the collection of the information, if the collection is required or authorised by law, we are to do so pursuant to the scope of our agreement with a Customer, it is fair and reasonable to protect the welfare of a contractor, including by preventing a serious medical or health scenario or threat to life, health, safety and physical and mental wellbeing of that individual, a permitted general situation exists or a permitted health situation exists.

4.3.4. Dealing with unsolicited personal information

If we receive Personal Information that is not solicited by us through the means of collection outlined in this Policy, it will only be held, used and or disclosed if it is considered personal information that could have been collected by the means outlined in this Policy. If that unsolicited information could not have been collected by normal means, then Alliance SI will destroy, permanently delete or de-identify the Personal Information as appropriate unless it is otherwise lawful and reasonable for Alliance SI to hold, use and disclose that personal information. If such unsolicited information is Sensitive Information, unless we already have your consent, we will obtain Your consent to retain it regardless of what the circumstances are.

'Unsolicited information' is often in the form of the following:

- postal- letters, notes, documents (either misdirected or otherwise).

- electronic- emails, SMS, electronic messages (either misdirected or otherwise).
- Telephone enquiries to reception, employees, or other staff members.
- Employment and contractor applications sent to Alliance SI that are not in response to an advertised vacancy.
- Additional information provided to Alliance SI that was not requested. This may include information supplied by police, government agencies, and medical professionals, including in emergency situations.

4.4. Integrity of Your Personal Information

4.4.1. Quality of Personal Information

We ensure that the Personal Information we collect and use or disclose is accurate, up to date, complete and relevant. Please contact us if any of the details You have provided to us change or if You believe that the information we have about You is not accurate or up to date.

4.4.2. Security of Personal Information

We are committed to ensuring that we protect any Personal Information we hold from misuse, interference, loss, unauthorised access, modification and disclosure.

For this purpose, we have a range of practices and policies in place to provide a robust security environment. We ensure the on-going adequacy of these measures by regularly reviewing them.

We may hold Your Personal Information in physical form or in electronic form on computer systems located in Australia or overseas, including with contracted third-party technology and 'cloud' storage providers. We take reasonable steps to protect Your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorised access, disclosure, and alteration of Your Personal Information. Safeguards include the use of firewalls and data encryption, physical access controls to the data centres, and information access authorisation controls.

4.5. Use or disclosure of Personal Information

Alliance SI collects Personal Information in order to provide accurate services, including to its Customers pursuant to relevant agreements, and to subcontractors, and to accurately disclose that information to third parties as required pursuant to relevant agreements.

The purposes for which we will hold and use Personal Information will depend on Alliance SI's interaction with you. Alliance SI will only hold and use your personal information for the purpose we collected the information or for purposes that are related to that purpose and provided it is fair and reasonable for us to do so. Alliance SI will only hold and use your personal information for another purpose if you provide consent or Alliance SI is required or authorised by law to hold or use it for that purpose and provided it is fair and reasonable for us to do so.

Alliance SI may disclose your Personal Information to entities for the purposes specified in this Policy.

Alliance SI will only disclose your Personal Information to another person for the purpose Alliance SI collected the information or for purposes that are related to that purpose. Alliance SI will only disclose your Personal Information to another person for another purpose if you provide consent or Alliance SI is required or authorised by law to disclose it for that purpose and if it is fair and reasonable for Alliance SI to do so.

4.5.1. Use or Disclosure

If we hold Personal Information about You that was collected for a particular purpose ("the primary purpose"), we will not use or disclose the information for another purpose ("the secondary purpose") unless:

- We have obtained Your consent to use or disclose the information; or
- You would reasonably expect us to use or disclose the information for the secondary purpose and the secondary purpose is:
 - if the information is sensitive – directly related to the primary purpose; or
 - if the information is not sensitive – related to the primary purpose.
- the use or disclosure of the information is required or authorised by or under an Australian law or a court/tribunal order; or
- a permitted general situation exists in relation to the use or disclosure of the information by us; or
- a permitted health situation exists in relation to the use or disclosure of the information by us, in which case we will de-identify the information before disclosing it; or
- we reasonably believe that the use or disclosure of the information is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
- where we use or disclose personal information in accordance with this section, we will keep a copy of this disclosure (e.g.: the email or letter used to do so).

4.5.2. Who we may disclose to

Depending on the product or service You have, the entities we disclose Your information to include but are not limited to:

- regulatory bodies in Australia and overseas.
- Government departments.
- external organisations that are our assignees, agents or contractors.
- companies that help us provide our services, such as technology services providers as well as finance and project administration services.
- other persons and entities as permitted under the Privacy Act.
- entities as required pursuant to relevant agreements including with Customers, suppliers, vendors and subcontractors.
- legal representatives and insurers including underwriters.
- nominated contacts including for emergency or welfare purposes.
- entities providing administrative, marketing and financial services to Alliance SI.
- anyone who an individual authorises Alliance SI to disclose information to; and
- anyone to whom Alliance SI is required or authorised to disclose the information to by law.

Customers

We may disclose your Personal Information to financial institutions, IT providers, professional advisers, regulators, financial auditors, and ISO auditors. The purposes of these disclosures includes accounts management and invoicing, service delivery, audits, and legal obligations.

Subcontractors and subcontractor staff

We may disclose your Personal Information to Customers, regulators, professional advisers, financial auditors, and ISO auditors. The purposes of these disclosures includes accounts management and invoicing, compliance, service delivery, audits, and legal obligations.

Suppliers and vendors

We may disclose your Personal Information to financial institutions, professional advisers, financial auditors, and ISO auditors. The purposes of these disclosures includes accounts management and invoicing, compliance, service delivery, audits, and legal obligations.

Job applicants/ Prospective Employees

We may disclose your Personal Information to recruitment agencies, referees, background check providers, regulators, financial auditors, and ISO auditors. The purposes of these disclosures includes verification and human resourcing, compliance, audits, and legal obligations.

Directors, Officers, and Key Business Contacts

We may disclose your Personal Information to regulators, professional advisers, financial auditors, and ISO auditors. The purposes of these disclosures includes corporate governance obligations, regulatory reporting, compliance, service delivery, audits, and legal obligations.

Website

We may disclose your Personal Information to hosting providers, analytics providers, and IT security providers. The purposes of these disclosures includes Website operation, analytics, and security.

Generally

Our use or disclosure of Your personal information may not be limited to the examples above and may also include us collecting Your personal information from these entities and individuals. We will take reasonable steps to ensure that the entities and individuals that we disclose Your personal information to are bound by sufficient confidentiality and privacy obligations with respect to the protection of Your personal information in compliance with the law.

For example, in the course of the provision of services provided by or to Alliance SI, Alliance SI may disclose Personal Information to relevant individuals and Customer representatives, and entities nominated in the information including the Australian Taxation Office and other government departments, superannuation funds, unions, financial institutions, creditors, a credit provider and a credit reporting agency.

In addition, Alliance SI uses services that requires Personal Information to be disclosed to those service providers, including service providers located overseas. That is, Personal Information about an individual may be disclosed to an overseas organisation in the course of the provision of services, for example:

- Xero and similar accounting software;
- HubSpot and similar third-party client relationship management platforms;
- Sharepoint and similar third-party information management/ record keeping platforms.
- Simpro for managing workforce and labour hire communications

Alliance SI will however take all reasonable steps not to disclose an individual's Personal Information to overseas recipients unless Alliance SI:

- has the individual's consent (which may be implied);
- has satisfied itself that the overseas recipient is compliant with the APPs, or a similar privacy regime, or if there is a suitable agreement in place with the overseas recipient;
- has formed the opinion that the disclosure will lessen or prevent a serious threat to the life, health, or safety of an individual or to public safety; or
- is taking appropriate action in relation to suspected unlawful activity or serious misconduct.

4.5.3. Outsourcing

We may disclose Your personal information when we outsource certain functions, including information technology support, finance and project administration services, and customer support enquiries including to entity located overseas in the Philippines. We may also seek expert help from time to time to help us improve our systems, products and services.

In all circumstances where Your Personal Information may become known to our contractors, agents and outsourced service providers, there are confidentiality arrangements in place. Contractors, agents and outsourced service providers are not able to use or disclose Your Personal Information for any purposes other than our own. Alliance SI will provide those entities with only the personal information they need to deliver the service.

We may disclose Personal Information regarding Customers to our contractors, in order for services to be provided to Customers. Likewise, contractors may disclose a Customer's Personal Information to us in the course of the provision of services to a Customer.

We take our obligations to protect Your personal information very seriously and make every effort to deal only with parties who share and demonstrate the same commitment to the protection and handling of Your personal information.

4.6. Direct marketing

Alliance SI engages in marketing as an important part of ensuring that it continues to provide quality services. Personal Information held by Alliance SI may be disclosed to organisations that assist in marketing activities. Customers and other members of the wider community will from time to time receive marketing information. Publications, like emails, newsletters, flyers which include Personal Information, may be used for marketing purposes.

We will only use or disclose the Personal Information we hold about You for the purpose of direct marketing if we have received the information from You and You have not requested, not to receive such information. Direct marketing means that we should use Your Personal Information to provide You with information on our products and services that may interest You.

We may disclose Your Personal Information to third parties who assist us in providing marketing offers to You. We will never sell Your Personal Information to any organisation outside of Alliance SI. You can opt-out of receiving marketing information altogether by contacting us.

4.7. Cross border disclosure of personal information

We will only disclose Your Personal Information to a recipient who is not in Australia and who is not our entity after we ensure that:

- the overseas recipient does not breach the APPs; or
- You will be able to take action to enforce the protection of a law or binding scheme that has the effect of protecting the information in a way that is at least substantially similar to the way in which the APPs protect the information; or
- You have consented to the disclosure after we expressly disclosed to You that there is no guarantee that the overseas recipient will not breach the APPs; or
- the disclosure of the information is required or authorised by or under an Australian law or a court/tribunal order; or
- a permitted general situation (other than the situation referred to in item 4 or 5 of the table in subsection 16A (1) Privacy Act) exists in relation to the disclosure of the information.

We disclose some limited customer support services (finance and project administration services) to an entity in the Philippines.

4.8. Access to and Correction of personal information

You have a right to request access to the Personal Information we hold about You, subject to exceptions allowed by law. We will generally be able to meet Your request, subject to certain exceptions under the Privacy Act. We may charge for giving access to Personal Information and will inform You in advance of any likely charge. If You would like to access Your information, please contact us on the details set out below. Your request will usually receive a response within 5 business days.

Upon receiving such a request, Alliance SI may take steps to verify the individual's identity before granting access or correcting any perceived inaccuracy. If the rejection relates to a request/ application to change

Personal Information, an individual may make a statement about the requested change and Alliance SI will include this statement with the relevant record.

To make a request/ application to access or to update any Personal Information Alliance SI holds about an individual, please contact Alliance SI's Privacy Officer in writing via email below. An applicant for access will be required to specify what information is sought to be accessed, corrected, or updated. Alliance SI may charge a fee to cover the cost of verifying an application and locating, retrieving, reviewing, and copying any material requested. If the information sought is extensive, Alliance SI will advise the likely cost in advance.

In the event that we refuse You access to or correct Your Personal Information, we will provide You with an explanation for that refusal. These reasons may include:

- where providing access or correction will provide a serious threat to life or health of any individual or pose an unreasonable impact on the privacy of other individuals.
- where the access or correction may result in a breach of Alliance SI's duty of care to another.
- the request for access or correction is frivolous or vexatious.
- the information relates to legal proceedings between us and You.
- the information would reveal our commercially sensitive decision-making process; or
- we are prevented by law from disclosing the information or providing access or correction.

Alliance SI takes reasonable steps to ensure that the Personal Information we collect, use or disclose is accurate, complete, up-to-date and relevant to the products or services provided to You or the nature of our relationship with You. If You believe that this is not the case in relation to any Personal Information we hold about You, You have the right to request that we correct Your Personal Information. To request correction of Your Personal Information, please contact us on the details set out below.

4.9. Anonymity and Pseudonymity

Where lawful and practicable, individuals have the option of not identifying themselves or of using a pseudonym when dealing with Alliance SI.

4.10. Notification of Collection

We will notify individuals at or before the time of collecting their Personal Information, including when we collect from third-party sources or where overseas disclosures are involved.

4.11. Data Breach Notification

Alliance SI has procedures in place to assess and respond to data breaches in accordance with the Notifiable Data Breaches (NDB) scheme under the Privacy Act.

Alliance SI will take appropriate, prompt action if it has reasonable grounds to believe that a data breach may have or is suspected to have occurred. Depending on the type of data breach, this may include a review of our internal security procedures, taking remedial internal action, notifying affected individuals and the Office of the Australian Information Commissioner (OAIC). If Alliance SI is unable to notify individuals, it will publish a statement on the Website and take reasonable steps to publicise the contents of this statement.

4.12. Data Retention

We retain Personal Information only for as long as necessary to fulfil the purposes for which it was collected, may be used or disclosed under this Policy, the Privacy Act or the APPs, save where Alliance SI is required by law or a court order to retain the personal information. Alliance SI will take reasonable steps to destroy or de-identify the personal information it holds once the personal information is no longer needed.

4.13. Data Quality and Security

Alliance SI takes reasonable steps to ensure the information it holds is accurate, complete, up-to-date, and protected from misuse, interference, and loss.

In respect of some services, Alliance SI will collect, hold, use and disclose Personal Information that is provided by a Customer as well as an individual.

Alliance SI will be provided only that Personal Information which the Customer agrees to provide and is considered necessary and relevant to the contracted services required of it.

Alliance SI holds personal information in a combination of hard copy and electronic files. Alliance SI stores personal information in a variety of formats including, but not limited to:

- databases.
- hard copy and paper-based files.
- personal devices, including laptop computers and mobile phones.
- third party storage providers such as cloud storage facilities.

Alliance SI uses Hubspot CRM with two factor authentication. Access to the Website by Alliance SI employees and contractors is also via two factor authentication.

Alliance SI takes all reasonable steps to protect the Personal Information it holds from misuse, loss, unauthorised access, modification, or disclosure. Alliance SI's staff, and contractors are required to respect the confidentiality of an individual's Personal Information that they access, and the privacy of individuals, in the provision of services by or to Alliance SI.

These steps include, but are not limited to:

- restricting access and user privilege of information by employees, contractors, volunteers and stakeholders depending on their role and responsibilities
- ensuring employees, contractors, volunteers and stakeholders do not share personal passwords and update their passwords regularly
- ensuring access to Alliance SI's premises are always secured
- ensuring IT and cyber security systems, policies and procedures are implemented and up to date
- ensuring employees, contractors, volunteers and stakeholders comply with internal policies and procedures when handling personal information
- undertaking due diligence with respect to third party service providers who may have access to personal information, third party contractors who are engaged to facilitate the provision of services, and cloud service providers to ensure as far as practicable that they are compliant with the APPs or a similar privacy regime
- the destruction, deletion or de-identification of personal information it holds that is no longer required for the purpose that it was collected unless required to be retained by any other laws
- ensuring hard copy files are stored in lockable filing cabinets in lockable rooms. Staff access is subject to user privilege.

- regular reviews of Alliance SI's network, application, and operational conduct through the use of internal audits and external security assessments. All audits shall be undertaken by suitably qualified personnel.

Alliance SI has implemented the Essential Eight, operating at Maturity Model Level 2 as a mitigation strategy against cyber threats.

Unless specified otherwise, Alliance SI will not retain Personal Information beyond the legal minimum period. This period will be 7 years commencing its collection.

The Website may contain links to other third-party websites outside of Alliance SI. Alliance SI is not responsible for the information stored, accessed, used, or disclosed on such websites and Alliance SI cannot comment on their privacy policies.

At all times, information accuracy and quality will be the responsibility of the Customer and its employees.

Alliance SI takes all reasonable steps to ensure the Personal Information it holds, uses, and discloses is accurate, complete, and up to date, including at the time of using or disclosing the information.

If Alliance SI becomes aware that the Personal Information is incorrect or out of date, Alliance SI will take reasonable steps to rectify the incorrect or out of date information.

5. Compliance

Compliance with this policy is monitored by the Chief Operating Officer. Breaches may result in disciplinary action, including termination or legal consequences where applicable.

6. Questions or concerns

If you have a concern about your privacy, Alliance's compliance with the Privacy Act or APPs, or a query on how Alliance SI handles your Personal Information, please contact us. We will respond to your query or complaint as soon as reasonably practicable. Alliance SI may seek further information in order to provide a full and complete response.

Alliance SI does not charge a fee for the handling of complaints.

Privacy Officer
Joshua Maxwell
Chief Operating Officer
privacy@alliancesi.com.au

If you are not satisfied with our response, you may also contact the OAIC. A complaint can be made using the OAIC online Privacy Complaint form or by mail or email. A referral to OAIC should be a last resort once all other avenues of resolution have been exhausted.

7. Exceptions

There are no exceptions to this policy unless required by law or approved by the Chief Executive Officer.

8. Roles and Responsibilities

Chief Operating Officer (Alliance SI Privacy Officer): Oversight and implementation of the privacy policy.
All staff and contractors: Compliance with privacy obligations and reporting breaches.

9. Related Policies and References

- Australian Privacy Principles,
- Privacy Act 1988,
- Alliance SI Information Security Policy.

10. Policy Review

This Privacy Policy will be reviewed at least annually or following significant changes to legislation or business practices. We may make changes to this Privacy Policy from time to time, by publishing our updated privacy policy on our Website.

Privacy Officer Approval

Approved by Privacy Officer

Name: Joshua Maxwell

Title: Chief Operating Officer / Privacy Officer

Signature: Joshua MAXWELL

Date: 10/03/2026