

# OMC International Privacy Policy

---

OMC International Pty Ltd ACN 066709724 and its related bodies corporate (referred to as **OMC, we, us** or **our**) have implemented this Privacy Policy to provide our employees, users of our website <http://omcinternational.com/> (**Website**) and users (or prospective users) of our other products or services with information about how we collect, hold and use Personal Information you provide to us. If you wish to make any inquiries regarding this Privacy Policy, you should contact our Privacy Officer in any of the ways specified in paragraph 10.

We may, from time to time, review and update this Privacy Policy, including to take into account new laws, regulations, practices and technology. All Personal Information held by us will be governed by our most recent Privacy Policy, posted on our Website.

## 1. What Personal Information do we collect?

- 1.1 **"Personal Information"** is information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable, and in the case of OMC employees, includes health information.
- 1.2 Personal Information collected may include (but is not limited to) the following:
  - (a) name, and email address;
  - (b) your location and physical address (including the country in which you are situated);
  - (c) contact details including facsimile and telephone numbers (landline and mobile);
  - (d) the name, email address and physical address of your employer or any organisation you are a member of, on whose behalf you contact OMC;
  - (e) your job title or position;
  - (f) your reasons for contacting OMC, or having an interest in OMC's products or services;
  - (g) your history of accessing our Website or other products or services;
  - (h) in the case of OMC employees, details of any medical conditions which may be relevant to the protection of your health and safety in the workplace.

## **2. When and why we collect Personal Information**

- 2.1 We collect your Personal Information to allow us to conduct our business functions, to market and sell our products and services and for the specified purposes set out in paragraph 4.1.
- 2.2 We may collect your Personal Information in the course of providing you with products or services, or when you:
- (a) visit our Website (see paragraph 3);
  - (b) buy our products or services;
  - (c) register for or use an account on our Website;
  - (d) request information about us, our products or our services;
  - (e) provide feedback;
  - (f) fill in a form on our Website;
  - (g) in the course of providing you with products or services;
  - (h) or your employer provides that information to us in the course of conducting or administering our relationship with you;
  - (i) submit a job application to us;
  - (j) contact us by telephone, facsimile, email, post or in person; and
  - (k) in the case of OMC employees, when you disclose details of a medical condition to us, either at the commencement of, or during the course of your employment with us.
- 2.3 We may also collect Personal Information about you via third parties (including your employer, our service providers (as described in paragraph 3), our agents and representatives, and other organisations (including other customers) or individuals), for example, where you notify a third party alliance partner of your interests in an OMC product or service.
- 2.4 Where we engage with you multiple times over a short period in relation to the same matter, we may not provide you with a separate notice about privacy each time we engage with you.

### **3. Information collected via our Website**

- 3.1 We will not collect any Personal Information about users of our Website except when they knowingly provide it or as otherwise described below.
- 3.2 Personal information may be collected by us and by our third party service providers who assist us in operating the Website.

#### ***Google Analytics***

- 3.3 We use Google Analytics to help analyse how you use our Website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated is used to create reports about the use of our Website. Google will store this information. We will not (and will not allow any third party to) use Google Analytics to track or to collect any personally identifiable information of visitors to our Website. We will not associate any data gathered from this Website with any personal information from any source as part of our use of Google Analytics.
- 3.4 If you do not want your Website visit data reported by Google Analytics, you can install the Google Analytics opt-out browser add-on. For more details on installing and uninstalling the add-on, please visit the Google Analytics opt-out page at <https://tools.google.com/dlpage/gaoptout>.

#### ***Click Stream Data***

- 3.5 In common with many websites, when you read, browse or download information from our Website, we or our internet service provider may also collect information such as the date, time and duration of a visit, the pages accessed, the IP address of your computer, and any information downloaded. This information is used for statistical, reporting and website administration, maintenance and improvement purposes only and will not be used to identify you.

#### ***Cookies***

- 3.6 Like many websites, our Website may use 'cookies' from time to time. Cookies are small text files that are transferred to a user's computer hard drive by a website for the purpose of storing information about a user's identity, browser type or website visiting patterns. Cookies may be used on our Website to monitor web traffic, for example the time of visit, pages visited and some system information about the type of computer being used. We use this information to enhance the content and services offered on our Website.

- 3.7 Cookies are sometimes also used to collect information about what pages you visit and the type of software you are using. If you access our Website or click-through an email we send you, a cookie may be downloaded onto your computer's hard drive.
- 3.8 Cookies may also be used for other purposes on our Website but in each case none of the information collected can be used to personally identify you.
- 3.9 You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.
- 3.10 If you disable the use of cookies on your web browser or remove or reject specific cookies from our Website or linked sites then you may not be able to gain access to all of the content and facilities in those websites.

### **Web Beacons**

- 3.11 Web beacons are images that originate from a third party site to track visitor activities. We use web beacons to track the visiting patterns of individuals accessing our Website.

### **Third party content (Including social media links)**

- 3.12 Some of the content on our Website may connect to applications made available by third parties, such as social media buttons or links that allow you to share content or links to our Website through the relevant third party platforms. These third party applications themselves may facilitate collection of information by those third parties, through your interaction with the applications and sometimes even if you do not interact directly with them. We are not responsible for the technical operation of these applications or the collection and use practices of the relevant third parties. Please visit the relevant third party websites to understand their privacy practices and options they may make available to you in relation to their collection of your Personal Information.

## 4. How we use your Personal Information

- 4.1 We use the Personal Information we collect about you for our business functions and activities, which may include the following:
- (a) to comply with relevant State and Federal law and government regulations;
  - (b) to assist us in providing you with information and support for our products or services;
  - (c) to manage and administer any account you may hold with us;
  - (d) to communicate with you and provide you with information, products or services you have requested;
  - (e) to promote and market our products and services, or the products and services or our third party alliance partners to you or provide you with information that we believe may be of interest to you;
  - (f) to allow us to provide advertising material to you regarding us, our customers and other third party alliance partners;
  - (g) to allow you to use OMC's various products or services to assist you in conducting your business;
  - (h) to personalise and customise your experiences on our Website;
  - (i) where we have collected Personal Information from you as a result of you applying for a job with us, to enable us to undertake our recruitment processes; and
  - (j) to share your Personal Information with our related entities, business partners and selected third parties.
- 4.2 In the case of health information collected from our employees, we only use that Personal Information to manage the protection of your health and safety in the workplace, in accordance with any instructions you provide us, or otherwise, as required or permitted by law.
- 4.3 We reserve the right at all times to monitor, review, retain, and/or disclose any information as necessary to satisfy any applicable law, but we have no obligation to monitor the use of the Website or to retain the content of any user session.
- 4.4 You consent to us using your Personal Information in the above ways.

- 4.5 We may collect and use your Personal Information for other purposes not listed above. If we do so, we will make it known to you at the time we collect or use your Personal Information.
- 4.6 We do not otherwise collect, use or disclose your Personal Information without your permission, unless the collection, use or disclosure is:
- (a) in accordance with this Privacy Policy or any agreement you enter into with us; or
  - (b) required or authorised by law, including without limitation the Australian Privacy Principles under the *Privacy Act 1988 (Cth)*.
- 4.7 If you choose not to provide your Personal Information to us for the purposes set out in this Privacy Policy, you may not be able to access some or all of OMC's products or services (including the functionality of the Website or OMC's other systems), and we may not be able to undertake certain activities for you such as providing you with requested information, products or services.

## **5. To whom we disclose your Personal Information**

- 5.1 We may disclose, or provide access to, your personal information to third parties in connection with the purposes described in paragraph 4.1. Depending on the nature of your engagement with us, we may disclose your Personal Information to:
- (a) third parties that provide products and services to us or through us;
  - (b) our third party alliance partners, who may provide products similar or complementary to the products or services we provide;
  - (c) government regulatory agencies and associated organisations; and
  - (d) third parties that provide products and services to us or through us.
- 5.2 We may also disclose your Personal Information to our website host or software application providers in certain limited circumstances, for example when our Website experiences a technical problem or to ensure that it operates in an effective and secure manner.

- 5.3 Some of your Personal Information may be transferred, stored, processed or used overseas by us, our third party alliance partners, or by third party service providers. This may also happen if our related entities are overseas, if we outsource certain activities overseas or if transactions, information, services or products have an overseas connection. You consent to the collection, use, storage, and processing of your Personal Information outside of Australia.
- 5.4 In the case of health information collected from our employees, we only disclose that Personal Information as required or permitted by law, or with your consent.

## 6. Overseas disclosures

- 6.1 In particular, your Personal Information may be disclosed to:
- (a) third party service providers;
  - (b) our agents; and
  - (c) our third party alliance partners,

which may store your Personal Information overseas in such countries in which those parties or their, or our, computer systems may be located from time to time (including in New Zealand, the United States and India), where it may be used for the purposes described in this Privacy Policy, without us being responsible under the *Privacy Act 1988 (Cth)* for such use (or for any breach).

- 6.2 In these circumstances, you consent to the collection, use, storage and processing of your Personal Information in those countries. Where such parties are located overseas, you may have rights to enforce such parties' compliance with applicable data protection laws, but you may not have recourse against those parties under the Australian Privacy Act in relation to how those parties treat your personal information.

## 7. Marketing

- 7.1 You consent to us using your Personal Information for sending you information, including promotional material, about us or our products and services, as well as the products and services of our related entities and third party alliance partners, now

and in the future. You also consent to us sending you such information by means of direct mail, telemarketing, email, SMS and MMS messages.

- 7.2 If you do not want to receive marketing information from us or if you want to stop receiving telemarketing, you can do so in any of the following ways:
- (a) logging into your account on the Website and editing your email preferences; or
  - (b) contacting us using the contact details specified in paragraph 10.
- 7.3 If you provide your consent to receiving direct marketing from third parties and our third party alliance partners, we will provide them with your Personal Information to enable them to send information and advertising material to you. You can opt out of receiving this material from third parties by using the contact details specified in paragraph 10 if you do not want to receive marketing information from us.

## **8. Accessing and updating your Personal Information**

- 8.1 You are entitled to access Personal Information that we hold about you. If you request access to your Personal Information, in ordinary circumstances we will give you full access to your Personal Information. However, there may be some legal or administrative reasons to deny access. If we refuse your request to access your Personal Information, we will provide you with reasons for the refusal where required by law.
- 8.2 You can access and correct some of your Personal Information through the Website by logging into your account and updating or editing your profile at any time. Alternatively, a request for access can be made by contacting our Privacy Officer in any of the ways specified in paragraph 10.
- 8.3 We take all reasonable steps to ensure that any Personal Information we collect and use is accurate, complete and up-to-date. To assist us in this, you need to provide true, accurate, current and complete information about yourself as requested, and properly update the information provided to us to keep it true, accurate, current and complete. Please contact us in any of the ways specified in paragraph 10 if you believe that the Personal Information is inaccurate or incomplete, and we will use all reasonable efforts to correct the information.



## **9. Storage and security of Personal Information held by us**

- 9.1 We aim to keep your Personal Information secure. Any Personal Information that is collected via our Website or which is held on our computer systems is protected by safeguards including physical, technical.
- 9.2 If we find that we have no further need for your Personal Information we may remove it from our systems and destroy all record of it.

## **10. What to do if you have a question, problem or complaint about our use of your Personal Information or this Privacy Policy**

- 10.1 If you:
- (a) have a query or concern about this Privacy Policy or our Personal Information handling processes;
  - (b) wish to make a complaint in relation to a breach of your privacy;
  - (c) would like to access your Personal Information held by us;
  - (d) would like to opt out of direct marketing; or
  - (e) would like to correct your Personal Information held by us,
- please contact us in any of the following ways:
- » by phone on +61 3 9412 6500; or
  - » by email at [privacy@omcinternational.com](mailto:privacy@omcinternational.com).
- 10.2 We will acknowledge and log the complaint and monitor the response to ensure appropriate resources and timeframes are provided for a prompt resolution. We will investigate your queries and complaints within a reasonable period of time of receiving the complaint and will notify you of the outcome of our investigation.

Last updated: May 2019