



# Privacy Policy

April 2023

## 1. Purpose

- 1.1 Spirit Technology Services Pty Ltd ABN 99 112 320 804 (**Company**) recognises the importance of privacy and is committed to protecting your privacy when handling your personal information. This Privacy Policy explains how the Company will collect, hold, use, disclose, protect and otherwise handle your personal information in accordance with the Australian Privacy Principles contained in the Privacy Act 1988 (Cth).

## 2. What is personal information?

- 2.1 Personal information is information or an opinion about you from which you can be reasonably identified

## 3. Why does the Company collect personal information?

- 3.1 The Company collects personal information so that it can administer your investment in the Company, provide facilities and services that you request and comply with its legal obligations. If the Company does not collect your personal information, it may not be able to provide you with these services

## 4. What personal information does the Company collect?

- 4.1 In the course of administering your investment and providing you with associated products and services the Company may collect and hold the following personal information about you:
- (a) your name;
  - (b) address and other contact details;
  - (c) date of birth;
  - (d) tax file number (**TFN**); and
  - (e) banking details.
- 4.2 Generally, the Company will not collect sensitive information about you (such as your race or ethnic origin, political beliefs or religion). If the Company needs sensitive information, it will ask your consent when it collects this information and comply with the Australian Privacy Principles contained in the Privacy Act 1988 (Cth).

## 5. How does the Company collect your personal information?

### *Collecting information from you*

- 5.1 How the Company collects your personal information will largely depend on whose information it is collecting. If it is reasonable and practicable to do so, the Company will collect personal information directly from you.

- 5.2 Depending on how you choose to interact with the Company, the Company may collect your personal information when you contact the Company or its service providers by telephone, by email, through the Company's website or when you complete a form or document and provide it to the Company.

### ***Collecting information from third parties***

- 5.3 The Company may also collect information about you from other people (e.g. a third-party administrator) or independent sources. For example, the Company may collect personal information about you from its services providers, including the Company's share registry, Security Transfer Australia. However, the Company will only do so where it is not reasonable and practicable to collect the information from you directly. Where the Company has collected your information from a third party, such personal information will be held, used and disclosed by the Company in accordance with this Privacy Policy.
- 5.4 When you provide the Company with personal information you consent to the use, disclosure and handling of your personal information in accordance with this Privacy Policy and any subsequent amendments.

### ***Collecting information from visits to the Company's website***

- 5.5 The Company may collect information based on how you use its website including through 'cookies', web beacons and other similar technologies. Cookies are small text files that websites or apps may place on your computer or device and collect non identified/anonymous information about the users of its website such as the number of visitors, the number of pages viewed and the internet advertisements which bring visitors to the website.
- 5.6 The Company uses cookies to provide you with a more consistent experience across our services and reserves the right to ask advertisers or other partners to serve ads or services to your devices, which may use cookies or similar technologies placed by us or the third party. This information is collected to analyse and improve the Company's website, its marketing campaigns and to record statistics on web traffic.
- 5.7 No attempt is made by the Company to use this information to personally identify you. We record a variety of information from interactions with our online services including IP address, locations data (where available and not disabled by the user), dates, times, and another user activity. In most cases we will not be able to reasonably identify an individual from the information collected. However, if cookie information is linked with personal information, we hold about you as set out above, this cookie information becomes personal information and will be treated in the same manner as the personal information to which it has been linked.
- 5.8 You can remove or reject cookies by adjusting the settings on your web browser.

### ***Unsolicited information***

- 5.9 If the Company receives personal information that it has not requested, or it determines that the personal information received is not reasonably necessary to provide its services, the Company will take reasonable steps to de-identify or destroy that personal information.

## **6. How does the Company hold your personal information?**

### ***Storage and security of your personal information***

- 6.1 The security of your personal information is of paramount importance to the Company and it takes reasonable steps to protect the personal information it holds about you from misuse, loss, unauthorised access, modification or disclosure. The Company has a number of safeguards in place to protect the personal information we hold, including password protected databases, staff training and system firewalls. The Company maintains password security and restricted access to all electronic documents containing personal information and stores hard copy documents in secured locations.
- 6.2 The Company will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for the purpose for which the information was used or disclosed.

## **7. How does the Company use your personal information?**

- 7.1 The Company may hold, use or disclose your personal information so that it can administer your investment in the Company and provide facilities and services that you request.
- 7.2 The Company may also collect, hold, use or disclose your personal information to:
  - (a) consider any concern or complaint that you raise against the Company or to manage any legal action between you and the Company;
  - (b) prevent or investigate any actual or suspected fraud, unlawful activity or misconduct;
  - (c) identify you or establish your tax status under any Australian or foreign legislation; or
  - (d) comply with any relevant laws, regulations, codes or practice and court orders.
- 7.3 The Company may also use your personal information to identify a product or service that may be of interest to you. If at any time you no longer wish to be notified about other services or promotions please unsubscribe by using the opt out link in the communication or contact the Company via the privacy specific contact details provided at the end of this Privacy Policy.

## **8. How is personal information disclosed to others?**

- 8.1 The Company does not sell, rent or trade personal information to, or with, third parties.
- 8.2 The Company's website may contain links to other websites. The Company does not share your personal information with those websites and it is not responsible for their privacy practices.
- 8.3 In some circumstances your personal information may be disclosed to service providers that perform a range of services on behalf of the Company including:
  - (a) mailing houses and printing companies;
  - (b) auditors and solicitors;
  - (c) registry providers (including Security Transfer Australia);
  - (d) information technology vendors; and

(e) other consultants.

- 8.4 Personal information may be disclosed to third parties in Australia and overseas.
- 8.5 If the Company transmits your personal information over the internet (for example to third parties who hold data outside Australia) we will take reasonable steps to maintain the security of any personal information to prevent misuse and unauthorised access. Despite these protection mechanisms, you should be aware there are inherent risks associated with the transmission of data over the internet and we cannot guarantee any transmission will be completely secure.
- 8.6 Where the Company discloses your personal information to its service providers, it will take steps to ensure that they are authorised to only use personal information in order to perform the functions required by the Company and in accordance with the Privacy Act 1988 (Cth).
- 8.7 The Company may also disclose your personal information to law enforcement agencies, courts or government agencies where required to comply with specific legal requirements. In particular, the Corporations Act 2001 (Cth) requires certain information about you to be included in the Company's registers which are able to be accessed by the public

## **9. How you may access or correct your personal information**

- 9.1 You may contact the Company to request access to the personal information that it holds about you at any time. You may also ask the Company to correct information about you that you may believe is inaccurate, incomplete or out of date.
- 9.2 Please contact the Company using the contact details below if any of the personal information that the Company holds about you is not correct or complete, or if you wish to request access to the personal information which the Company holds about you. The Company will need to verify your identity before giving you access to, or correct, your personal information.
- 9.3 In certain circumstances, the Company may not be able to correct or provide you with access to your personal information. In these circumstances, the Company will write to you to explain and provide the reasons why.

## **10. How you may complain if you have concerns about how the Company has managed your personal information**

- 10.1 If you have a complaint related to how the Company has managed your personal information, please contact the Company using the contact information below. The Company may ask you to place your concerns in writing in order for it to fully understand and investigate the issues you have raised. We will endeavour to respond to your request within 30 days. All such complaints will be handled with the appropriate discretion.
- 10.2 If a complaint remains unresolved, you may access an external dispute resolution service or apply to the Office of the Australian Information Commissioner (OAIC) at [www.oaic.gov.au](http://www.oaic.gov.au) to have the complaint heard and determined.
- 10.3 Further information on the Act and the Australian Privacy Principles, can be found at [www.privacy.gov.au](http://www.privacy.gov.au).

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

- 11.1 If you have any questions about this Privacy Policy, if you wish to complain about how the Company handled personal information about you or if you wish to access or correct your personal information, please contact the Company Secretary on:

**Tel:** 1300 007 001  
**Email:** askus@spirit.com.au  
**Mail:** Spirit Technology Services Pty Ltd  
Level 2  
19-25 Raglan Street,  
South Melbourne VIC 3205

## **12. Changes to the Company's privacy policy and information handling practices**

- 12.1 This Privacy Policy is subject to change at any time. If the Company changes this policy an updated version will be posted on the Company's website to notify you of this change. Please check the Company's Privacy Policy on its website [www.spirit.com.au](http://www.spirit.com.au) regularly for any changes. By continuing to use the Company's services you will be deemed to have accepted any changes to its Privacy Policy.