

FOREFRONT

Privacy Policy

Forefront, a subsidiary of Tasmea Limited (we, us or our), is an organisation and an “APP Entity” for the purposes of the **Privacy Act 1988** (Act), and is bound by the Australian Privacy Principles contained in the Act.

We appreciate the importance of good privacy practice and are committed to safeguarding personal information about individuals that we handle. This Privacy Policy describes generally how we manage this personal information and protect privacy, including how we comply with the Act and the Australian Privacy Principles.

This Privacy Policy is intended to provide a general overview of our policies in respect of the handling of your personal information. “Personal information” is essentially information or an opinion about an identified or reasonably identifiable individual.

This Privacy Policy is intended to cover most personal information we handle but is not exhaustive. Other policies may override or supplement this Privacy Policy in certain circumstances. For example, when we collect personal information from you, we may advise a specific purpose for collecting that personal information, in which case we will handle your personal information in accordance with that purpose. If you have any queries about our handling of your personal information, please contact us (see section 19 below).

As a member of the Tasmea Group, this Privacy Policy will apply to any subsidiary to the extent that it does not have its own policies on specific privacy-related topics.

2. Notification of Collection

When we collect your personal information, we take reasonable steps to ensure you are aware of certain details. This Privacy Policy provides those details as they typically apply in many situations. Specifically:

- the purposes for which we collect personal information are described in section 3;
- the organisations to which we would usually disclose it are described in section 7;
- whether we are likely to disclose it to overseas recipients, and where practicable the countries in which they are located, are described in section 9;
- whether there are laws or court/tribunal orders which require or authorise us to collect it is described in section 10; and
- the main consequences for you if you fail to provide it are described in section 11.

However, depending on our specific interaction with you, different details may apply. If we do not notify you of such other details, the details in this Privacy Policy apply.

3. Why We Handle Personal Information

Generally speaking, we collect, hold, use and disclose personal information so that we may provide our services and products, and effectively communicate and interact with you.

The purposes for which we handle personal information depend on your dealings with us, but generally may include enabling us to:

- provide services or products to our customers;
- communicate with our customers, suppliers and other business contacts (including providing information you request, responding to your enquiries, managing complaints or otherwise facilitating the purpose for which you have contacted us);
- handle payments;
- verify your identity if required;
- inform our customers and other business contacts about industry developments or information they might find of interest (including the offering of new services or products);
- market our services or products;
- manage our employees and contractors;
- seek feedback from you and perform market research to gauge satisfaction with our services or products;
- generally carry on our business (including maintaining records and ensuring compliance with legal and insurance obligations); and
- engage in other activities where required or permitted by law or where you have given consent.

4. What Personal Information We Collect and Hold

The kinds of personal information we may collect and hold about you depend on your dealings with us, but generally may include:

- your name and address, email address and telephone number;
- business details (business name, business address, contact details, details of services or products you purchase, and your position within your business or organisation if applicable);

- information about your relationships with others, such as our business contacts or customers;
- credit card and payment details if you purchase services or products from us;
- other personal information you voluntarily provide (such as qualifications, skills, education provider, work history, resume or residency status if you apply for employment with us).

We strive to limit personal information we collect to that which is reasonably necessary for our functions or activities.

5. How We Collect and Hold Personal Information

We collect your information directly from you, unless it is impracticable or unreasonable to do so.

The ways in which we collect and hold personal information depend on your dealings with us, but generally may include if you:

- meet with us (for example, providing personal details or a business card);
- communicate with us by letter, telephone, email or via our website;
- order services or products from us or register your interest;
- submit information through our websites or social media accounts (including LinkedIn).

We may also collect personal information about you from third parties such as:

- customers or potential customers;
- your employees, representatives or personal referees;
- your employer;
- publicly available resources.

By providing us with personal information about third parties, you confirm that you have obtained the relevant individual's consent for us to collect and handle that information in accordance with this Privacy Policy.

We may hold personal information in electronic or hard-copy formats. More information about how we store personal information is set out in section 13.

6. Use and Disclosure of Personal Information

We will generally only use or disclose your personal information for the purpose for which we collected it, and for related purposes we consider would be within your reasonable expectations.

Where we propose to use or disclose your personal information for another purpose, we will seek your permission unless required or permitted by law.

By providing personal information to us, you consent to its use and disclosure as described in this Privacy Policy.

7. Who We Disclose Personal Information To

We may disclose personal information to:

- suppliers who provide services or products to or for us (such as IT providers, payment processors or website administrators);
- other persons involved in the provision of our services or products (such as customers, suppliers, contractors and business contacts);
- our auditors, insurers and legal and professional advisers;
- members of the Tasma Group;
- any person authorised by you.

We endeavour to ensure third parties only receive information necessary to undertake their work and that they are bound by confidentiality obligations.

8. Direct Marketing

We may send marketing or promotional communications by post or electronic means (such as email or SMS). You may opt out at any time by contacting us (see section 19) or using any opt-out mechanism included in the communication.

9. Overseas Recipients

We are not likely to disclose personal information to overseas recipients except with your consent or where required or authorised by law.

Personal information may be stored or processed on servers located overseas; however, we generally retain effective control over the data.

10. Legal Requirements for Collection

There will not usually be Australian laws or court/tribunal orders which require or authorise us to collect your personal information.

11. Consequences of Failure to Collect Personal Information

If you fail to provide personal information we request, or if it is incorrect or incomplete, consequences may include us being unable to process your request or provide services.

You may choose to remain anonymous or use a pseudonym unless legally required or impracticable. We will notify you if identification is required.

12. Sensitive Information

We do not generally collect sensitive information. If we do, we only do so with your consent and where reasonably necessary for our functions or activities.

Unless you advise otherwise, we will assume you consent to the collection, use and disclosure of sensitive information you provide.

13. Storage and Security

We take reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification or disclosure.

Information stored on IT systems is protected by security features and procedures, and our systems are regularly monitored.

We cannot guarantee that information will be protected against unauthorised access or misuse.

We take reasonable steps to destroy or de-identify personal information when no longer required unless retained by law.

14. Access to and Correction of Personal Information

You may request access to or correction of your personal information.

We may refuse access or correction if legally required or permitted. If so, we will provide written reasons unless unreasonable to do so.

We may require identification or other procedures to maintain security.

We may charge costs for access but not for lodging a request.

We take reasonable steps to ensure information is accurate, up-to-date, complete and relevant.

15. Online Privacy

15.1 Automatic Server Logs

When using our website, our servers automatically collect details such as your IP address, browser type and data accessed. This information is used for statistical analysis and system administration.

15.2 Cookies

Our website uses cookies to improve your experience. You may disable cookies through your browser if preferred.

15.3 Email and Messages

If you send us email or messages, we may collect the personal information you provide and use it to respond or for related purposes.

15.4 Storage and Transmission Online

We cannot guarantee the privacy or security of information transmitted online unless specifically stated (such as encrypted transactions).

15.5 Other Online Services

Links to external websites are not operated by us. We are not responsible for their privacy practices.

16. Data Breach

If we suspect or identify unauthorised access, disclosure or loss of personal information, we will investigate promptly and comply with the requirements of the Act, including notifying affected individuals and the OAIC where necessary.

Please contact us if you believe a data breach may have occurred.

17. Complaints

If you have a complaint about our handling of personal information, please contact us. Your complaint will be assessed and may be escalated internally.

If you are not satisfied with our response, you may contact the OAIC (oaic.gov.au).

18. Changes to Our Privacy Policy

We may amend this Privacy Policy at any time. The latest version will be published on our website or available upon request.

19. Contact Details

Please contact us at:

info@forefrontservices.com.au

if you have an enquiry about our privacy practices or the handling of your personal information.