

# **SIRCA Privacy Policy**

Welcome, and thank you for subscribing to SIRCA's analytical research platform (*Platform*), being a collaborative platform for users to develop and conduct cloud based analytics, share research, knowledge and collaborate with one another and advance academic research related to their studies. By accessing the Platform, you (in your capacity as a Member and or a Visitor, as defined below) are agreeing to our terms and conditions of use, so please take a few minutes to read over our terms and condition of use set out in the User Agreement. Please note that by accessing the Platform you are entering into a legally binding agreement, and agree to the terms set out below, or as amended by SIRCA, in its discretion, from time to time.

The Platform is a shared infrastructure for the publishing of collaborative academic research conducted by the Users, and allows users to share research and findings and to collaborate with one another to advance the academic research of Members solely in relation to their studies at the relevant academic institution.

By accessing the Platform, you (in your capacity as a Member and or a Visitor, as defined below) are agreeing to our terms and conditions of use, which permit other Members to view certain personal details of other Members, including but not limited to the Member's name and email address. Access to certain Content may be restricted by the user when uploaded to the Platform.

Capitalised terms shall, unless the context indicates otherwise, have the same meaning as assigned to those words in the User Agreement.

We understand the importance of protecting your right to privacy and understand your concerns about the security of the personal information you provide to us. This policy has been prepared to help you understand how we aim to protect the privacy of your personal information.

The primary purpose for collecting such information is to arrange, conduct and promote the Platform and the Services and any other service offerings to Members.

Personal information is information, or an opinion, that identifies an individual, or from which a person's identity could be ascertained.

This policy details how we manage your personal information submitted through this Platform, sets out some of your privacy rights in relation to personal information, and advises how you can contact us with privacy queries.

#### 1. Collecting Personal Information

We may collect personal information from you in a number of ways. These include, but are not limited to situations in which you set up an account with Us, visit our site, utilise or trial our Services, complete a survey or questionnaire, enter a competition, make a comment or like or dislike a comment or Content published on the Platform or when you communicate with Us by telephone, fax, writing, email, or any other electronic means.

When you are using a service we provide to you over the internet (for example a website or mobile phone app), we may use technologies to collect information as to your activities on such services associated with Us including, but not limited to your IP Address and/or the type of operating system you use and/or the domain name of your Internet Service Provider, software and hardware attributes and the web-page or Services that you request. In addition, We may set and access your cookies and other similar technologies (not constituting personal information) on your computer, phone, tablet or any other mobile device or other internet-enabled device and may let other companies (such as third party advertisers) set and access their cookies on your computer (subject to their own policies). The use of cookies helps us to recognise you, improve and personalise your experience of our Services, measure your use of our products and Services. If you do not wish for information to be collected through the use of cookies, you can disable, remove or block the use of cookies in your internet browser.

Whilst We will attempt to ensure all transfer of data to a third party and use by a third party is secure. We cannot be held responsible for the theft of data by a third party, or the consequences resulting from the loss of data where that loss is associated with the technical malfunction, tampering by a third party, viruses, computer bugs, or any action or event beyond our reasonable control.

# SECURITIES INDUSTRY RESEARCH CENTRE OF ASIA-PACIFIC (SIRCA) LIMITED LTD ACN 080 496 993 (SIRCA) PRIVACY STATEMENT

You are solely responsible for ensuring that any Content you upload and or submit to the Platform complies with any applicable laws and third party rights, including but not limited to any intellectual property rights, privacy rights and publicity rights. You agree that any information in relation to a user may be used in accordance with our Privacy Policy and that any information posted, such as the username and name of notebooks, on the Platform and or via the Services may be accessible by other users. By accessing the Platform, you consent to the publication of your information on the Platform, which may be viewed by other Members

We also collect personal information from you in order to verify your identity. We collect personal information from you submitted through this Platform to assist us in providing our range of services to you. We will collect personal information (where reasonable and practicable) directly from you. We may at times collect your personal information directly from other sources. The personal information we collect about you may include your name, address, telephone number, fax number, email address, credit card details and company and/or business information. We aim only to collect personal information that is necessary to provide the agreed services that you have contracted or requested us to provide.

When you use the Platform, our service provider logs the following information for statistical purposes:

- your server address;
- top level domain name (for example .com, .gov, .au, etc.);
- the date and time of your web-site visit;
- the pages you looked at;
- the documents you downloaded;
- the previous site you visited; and
- the type of browser you used.

We collect personal information when users use the Platform to lodge their personal details and when users change or update any of these details, or if users send us documents or publish Content containing personal information.

While we endeavor to collect personal information only from the individual involved, in some instances we may also receive personal information about you from third parties accessing the Content and or using the Platform and or Services.

#### 2. How Do We Use Your Personal Information?

We will use your personal information to provide our Services relevant to you. We will use and disclose your personal information if the disclosure is necessary to answer your enquiry or request, to supply you with services ordered, and to complete the services we provide. We also use your personal information to verify your identity.

We may also use and disclose your personal information for the purposes of performing our administration and other operations, including accounting and responding to your support requests, marketing, record keeping, market research and website traffic analysis.

In some cases, we may disclose your personal information to third parties, but only if it is required to complete the transaction you have entered into.

You acknowledge that third parties have audit rights to verify the usage of their data by users and you consent to us providing third parties access to your personal information, including the data that you have accessed.

We will not misuse or change your information without your knowledge. To make sure of this, we regularly audit access to the systems that support us. If you choose not to provide your personal information, it may mean that we will not be able to provide our Services to you.

We will ensure that the personal information we collect to provide the Services to you is accurate and complete. We do this by ensuring that you have the opportunity to advise changes in personal details at all times.

# SECURITIES INDUSTRY RESEARCH CENTRE OF ASIA-PACIFIC (SIRCA) LIMITED LTD ACN 080 496 993 (SIRCA) PRIVACY STATEMENT

## 3. Storage and Security

Your personal information submitted through this Platform is stored electronically, on paper or both. We have physical, electronic and procedural safeguards for personal information and take reasonable steps to ensure that your personal information is protected. Data stored electronically is protected by both internal and external firewalls, and access to electronic records is limited by passwords. Only staff with a password have access to all information on the system and files can be designated read-only or no access.

We use secure methods to destroy or permanently de-identify your personal information when it is no longer needed. We will retain your personal information while it is required for any of its functions, or for any other lawful purpose

### 4. Relevant and or Direct Marketing

From time to time, We may use your personal information to identify programs, products and services that may be of interest to you. We may use your personal information to send you information regarding SIRCA's services, programs and products.

From time to time, We may also provide your personal information to carefully selected third parties for the purpose of Us providing you with information regarding products and services specific to your needs, and to help Us conduct targeted product and service enhancement activities.

If we need to use your personal information for another reason, we will ask your permission to do so. If we are unable to get your permission before sending our communication, we will give you the opportunity to opt out of any future direct marketing campaigns at the time of mailing to you by notifying us.

If you do not wish to receive direct marketing information from Us or third parties (as applicable) as outlined in this section, please let Us know by contacting privacy@sirca.com.au. We will take immediate steps to ensure that you do not receive any such direct marketing information in future.

## 5. Access & Correction

You have a right to know what information we store about you, and in most cases you are entitled to see this information to ensure it is correct. To obtain this information, please contact us to ask for your personal details.

This Agreement is governed by the laws of New South Wales Australia and the *Privacy Act 1988 (Privacy Act)*, may be applicable. The Privacy Act gives limited circumstances in which some or all access to this information may be denied. Where we do not agree to provide you with details of personal information we will explain this to you when you ask for your information.

We will take reasonable steps to amend or correct your personal information to keep it accurate and up to date. Please notify us via the above email address if there are any changes to your personal information.

### 6. Privacy Concerns or Complaints

If you have any queries or concerns about your personal information, or would like to make a complaint, please contact our Privacy Officer via enquiries@sirca.org.au for assistance.

We will respond to your complaint as soon as possible, within 14 working days, to let you know who is responsible for managing your query. We will try to resolve the complaint within 30 working days. When this is not possible we will contact you to provide an estimate of how long it will take to handle the complaint.

If you believe that We have not adequately dealt with your complaint, you may complain to the Privacy Commissioner whose contact details are as follows:

Officer of the Australian Information Commissioner (OAIC)



Phone: 1300 363 992? Email: enquiries@oaic.gov.au GPO Box 5218 Sydney NSW 2001

# 7. How to Contact Us

If you want further information on how we handle personal information, or if you want to discuss a possible breach of privacy, please contact us in one of the following ways: By telephone on +61 2 8355 2500 By e-mail: privacy@sirca.com.au]

July 2017