

Privacy & Personal Data Protection Policy

In its everyday business operations SAT makes use of a variety of data about identifiable individuals, including data about:

- Current, past and prospective employees
- Clients
- Users of its websites
- Subscribers
- Other stakeholders

In collecting and using this data, the organisation is subject to a variety of legislation controlling how such activities may be carried out and the safeguards that must be put in place to protect it.

The purpose of this policy is to set out the relevant legislation and to describe the steps SAT is taking to ensure that it complies with it.

This policy applies to all systems, people and processes that constitute the organisation's information systems, including directors, employees, suppliers and other third parties who have access to SAT Pty Ltd systems.

Privacy & Personal Data Protection Policy requirements

SAT respects the right to privacy and is committed to safeguarding the privacy of our clients and website visitors. We adhere to the Australian Privacy Principles contained in the Privacy Act 1988 (Cth). This policy sets out how we collect and treat personal information.

A privacy statement is a document that declares the intentions of the organisation in relation to client information and data, how personal information is stored, how clients can access this information and the purposes for which personal information is used and disclosed.

The SAT privacy statement includes sections on the following areas:

- Collection of personal information
- How we collect personal data
- Use of personal information
- Disclosure of personal information
- Security of personal information
- Access to personal information
- Complaints about privacy
- Changes to privacy policy
- Website

Collection of personal information

SAT will, from time to time, receive and store personal information entered onto our website or via SAT Service Desk, provided to us directly or given to us in other forms.

Before accessing services with SAT users will be required to provide some basic information such as name, phone number, address, and email address to enable us to send information, provide updates and process your service provision. We may collect additional information at other times, including but not limited to, when users provide





feedback when you provide information about personal affairs, change content or email preference, respond to surveys and/or promotions, provide financial or credit card information, or communicate with our customer support.

Additionally, we may also collect any other information provided by people interacting with us.

How we collect your personal information

SAT collects personal information in a variety of ways, including when people interact with us electronically or in person, when people access our website and when we provide our services. We may receive personal information from third parties. If we do, we will protect it as set out in this Privacy Policy.

Use of your personal information

SAT may use personal information collected to provide clients with information, updates, and our services. We may also notify you of new and additional services and opportunities that are available. We may use personal information to improve our services and better understand the needs of individuals.

SAT may contact individuals by a variety of measures including, but not limited to telephone, email, SMS or mail.

Disclosure of personal information

We may disclose personal information to any of our employees, managers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this Policy.

Personal information is only supplied to a third party when it is required for the delivery of our services and has been discussed with the client.

We may from time to time need to disclose personal information to comply with a legal requirement, such as a law, regulation, court order, subpoena, or warrant, in the course of a legal proceeding or in response to a law enforcement agency request.

We may also use personal information to protect the copyright, trademarks, legal rights, property or safety of SAT, its clients or third parties.

Information that we collect may from time to time be stored, processed, or transferred between parties located in countries outside of Australia.

If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible by law our user databases, together with any personal information and non-personal information contained in those databases. This information may be disclosed to a potential purchaser under an agreement to maintain confidentiality. We would seek to only disclose information in good faith and where required by any of the above circumstances.

By providing us with personal information, individuals consent to the terms of this Policy and the types of disclosure covered by this Policy. Where we disclose personal information to third parties, we will request that the third party follow this Policy regarding handling personal information.

Security of your personal information

SAT is committed to ensuring that the information provided to us is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

The transmission and exchange of information are carried out at your own risk.





We cannot guarantee the security of any information that is transmitted to us or received from us. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that the personal information that we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

Access to personal information

Individuals may request details of personal information that we hold about them in accordance with the provisions of the Privacy Act 1988 (Cth). This information will be provided within a reasonable time frame, free of charge. If an individual would like a copy of the information, we hold about them or believe that any information we hold on them is inaccurate, out of date, incomplete, irrelevant or misleading, please email us at info@satpty.com.

We reserve the right to refuse to provide you with information that we hold, in certain circumstances set out in the Privacy Act.

Complaints about privacy

If you have any complaints about our privacy practices, details of the complaint should be sent to privacy@satpty.com. We take complaints very seriously and will respond shortly after receiving written notice of the complaint.

Changes to Privacy Policy

Please be aware that we may change this Privacy Policy in the future. We may modify this Policy at any time, in our sole discretion and all modifications will be effective immediately upon our posting of the modifications on our website or notice board.

Website

When you come to our website we may collect certain information such as browser type, operating system, website visited immediately before coming to our site, etc. This information is used in an aggregated manner to analyse how people use our site, such that we can improve our service.

Cookies

We may from time to time use cookies on our website. Cookies are very small files that a website uses to identify a user when they come back to the site and to store details about their use of the site. Cookies are not malicious programs that access or damage your computer. Most web browsers automatically accept cookies, but individuals can choose to reject cookies by changing browser settings. However, this may prevent the user from taking full advantage of our website. Our website may from time to time use cookies to analyse website traffic and help us provide a better website visitor experience.

Third-party sites

Our site may from time to time have links to other websites not owned or controlled by us. These links are meant for individuals' convenience only. Links to third-party websites do not constitute sponsorship or endorsement or approval of these websites. Please be aware that SAT is not responsible for the privacy practices of other such websites. We encourage our users to be aware, when they leave our website, to read the privacy statements of each and every website that collects personally identifiable information.



Data Protection Officer

The General Manager will be the appointed Data Protection Officer (DPO) and will oversee this Policy.

Breaches

It is a requirement of the Privacy Act 1988 Notifiable Data Breaches (NDB) Scheme that when an organisation or agency the Privacy Act 1988 covers has reasonable grounds to believe an eligible data breach has occurred, they must promptly notify any individual at risk of serious harm. They must also notify the Office of the Australian Information Commissioner (OAIC). Breaches must be handled in accordance with the *MSP-34 Personal Data Breach Notification Procedure_OAIC*.

Application of the Privacy & Personal Data Protection Policy

The policy statements made in this document must be complied with. Failure by an employee to comply with these policies may result in disciplinary action being taken.

Questions regarding any SAT Pty Ltd policy should be addressed in the first instance to the employee's immediate line manager.

Dale Stacey

Managing Director

SAT Pty Ltd

7 August 2023