

Privacy Policy

1. Introduction

This is the official Privacy Policy of ApplyDirect (**Company**). This policy explains how we collect, store, use and disclose personal information and also explains your rights to access and correct that information or make a complaint about our handling of personal information. Personal information means information which identifies you as an individual or from which your identity can be reasonably ascertained (and regardless of the form of the information, and regardless of whether it is true or not).

2. What types of personal information do we collect?

We only collect personal information if it is necessary for one of our functions or activities. The types of personal information we collect will depend on the reason for collection. Generally the types of personal information we collect will include name, contact details and records of communications with us.

As part of the operation of this website, we and our web hosting provider automatically track certain information about you. This information includes your domain name and IP address, your browser version, your operating system, the URL you came from, and the pages you visit within the site. We use this information (in an aggregate and non-identifying form only) to monitor site performance, utilisation of features and services, traffic trends, user demographics, and to assist in the administration of the website. IP addresses are not linked to any personally identifiable information.

Our site may contain links to other sites. We are not responsible for the privacy practices or policies of those sites and recommend that you review their privacy policies.

3. How we collect and hold personal information

Where it is reasonable and practicable to do so, we collect your personal information directly from you when you correspond or register your details with us, enter into arrangements with us, or provide feedback to us. Depending on the nature of our interaction with you, we may collect personal information from third parties – for instance, information regarding shareholders is collected from our share registrar or share plan registrar, and information about job applicants is collected in the manner set out above.

We hold personal information electronically and, in some cases, hard copy form, both at our own secure premises and with the assistance of our service providers. We take all reasonable steps to ensure that the personal information that we hold is protected from loss, misuse, unauthorised access by ensuring that this information is held on secure servers in controlled facilities and that information stored within our computer systems can only be accessed by those entrusted with authority and computer network password sanctions.

4. Why we collect, hold and use personal information

We may use personal information for the primary purpose for which it is collected (eg. provision of our services, including administration of our services), or for purposes related to the primary purpose where it would reasonably be expected that we would use the information in such a way, or in other limited circumstances set out in the Privacy Act.

We collect, hold and use personal information to:

- communicate with, and comply with our legal obligations to, our shareholders;
- enable third party service providers to provide us and our related companies with services such as information technology, auditing, legal advice, printing and mailing services, and services relating to our share register and group employee share plan;
- correspond with people who have contacted us, and deal with feedback;
- provide services to, and manage, our related companies;
- correspond with people regarding our corporate sponsorships;
- recruit and assess potential employees; and
- maintain and update our records.

5. Why we disclose personal information

We do not disclose personal information to third parties unless we are permitted to do so by law or we have obtained consent to do so. We may disclose personal information for the primary purpose for which it is collected or for purposes related to the primary purpose where it would reasonably be expected that we would use the information in such a way. Also, we are permitted to disclose personal information in circumstances set out in the Privacy Act (including but not limited to disclosures to our related companies).

Third parties we may disclose personal information to include:

- Our related companies;
- Our service providers and professional advisors including IT service providers, auditors, legal advisors, mail houses and to share registrar and share plan management services
- Financial institutions;
- The organisations we support or sponsor; and
- Government agencies.

We take steps to ensure that our service providers are obliged to protect the privacy and security of personal information and use it only for the purpose for which it is disclosed.

We may disclose personal information we have collected to organisations located overseas in circumstances permitted by the Australian Privacy Principles.

We may use cloud computing solutions or data storage located overseas in which case information may be stored, under our control, on computer servers located outside of Australia.

6. Contract us

You can request access to your personal information held by us, or request that it be corrected, by contacting us at the address below. To ensure confidentiality, details of your personal information will be passed on to you only if we are satisfied that the information relates to you. A fee will not be charged for an access request, but you may be charged the reasonable expenses we incur (such as search and copying costs). If we refuse to provide you with access or correct the personal information held about you by us (in accordance with the Privacy Act), then we will provide reasons for such refusal.

If you have a question about our Privacy Policy or wish to make a complaint about the way we have collected, used, held or disclosed your personal information, please contact us at the address below. We may need to contact you for further details.

If you wish to make a formal complaint, please make your complaint in writing to our Privacy Officer. We will consider your complaint promptly and contact you to seek to resolve the matter.

Contact details:

The Company Secretary
AD1 Holdings Limited
Suite 102, 697 Burke Road, Hawthorn East, VIC 3123
Email: info@ad1holdings.com.au
Phone: (+61) 3 8199 0455