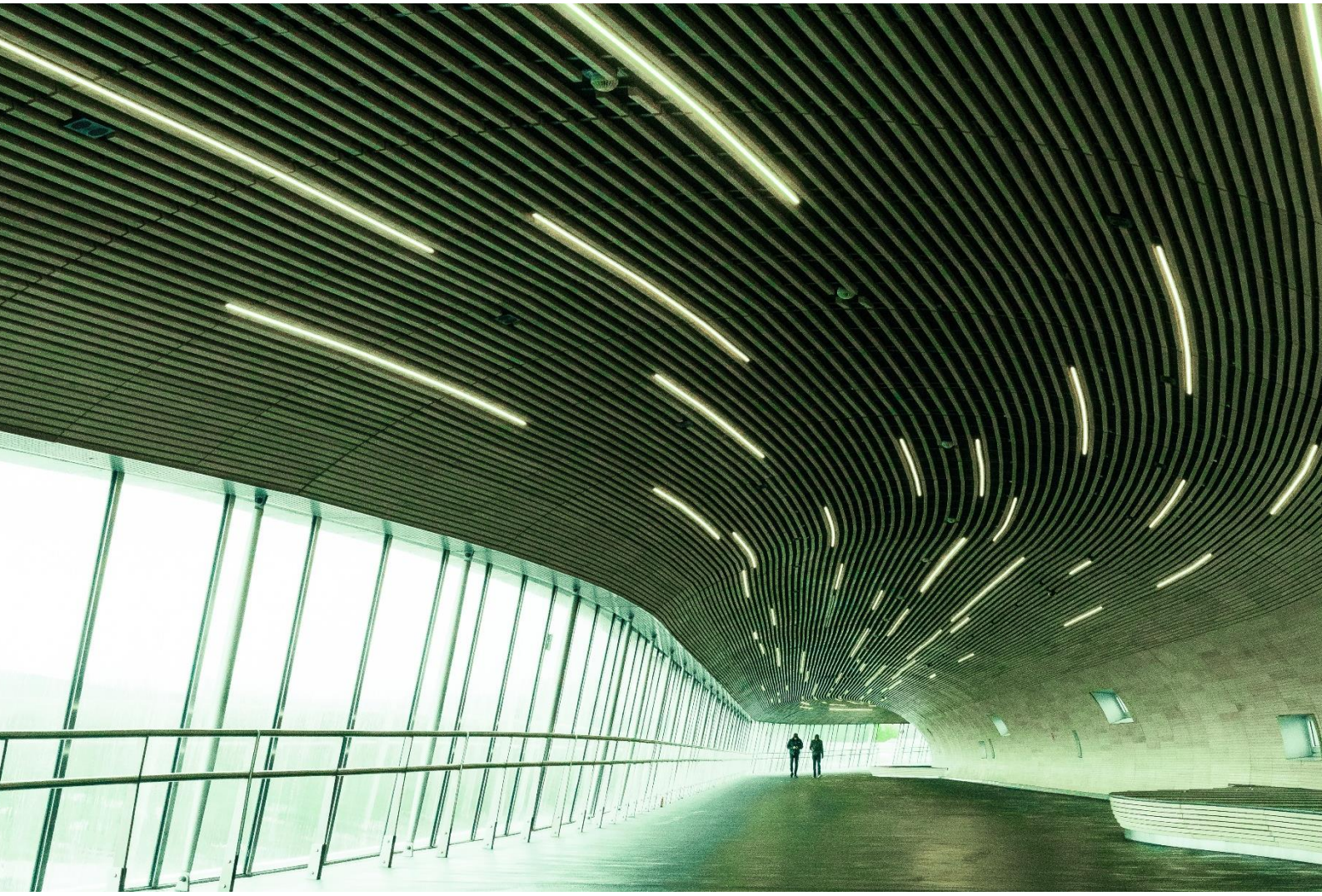# Privacy Policy

October 2021

# SCOPE & AIM

Tesserent has obligations concerning the collection, use, disclosure and storage of personal information. These obligations are set out in the Australian Privacy Principles (**APPs**) under the *Privacy Act 1988* (Cth) (**Privacy Act**), the New Zealand Information Privacy Principles (**IPPs**) under the *Privacy Act 2020* (NZ) (**NZ Privacy Act**) and other applicable State and Territory privacy laws.

In this Privacy Policy, references to "**we**", "**us**" and "**our**" are to Tesserent Limited ACN (605 672 928) and its subsidiaries (**Tesserent Group**). This policy applies to all staff including contractors and Board members within the Tesserent Group and any individual from who we collect personal information.

You consent to us collecting, holding, using and disclosing your personal information in accordance with this policy.

# POLICY

This policy details how the Tesserent Group complies with the requirements of the Privacy Act in protecting the personal information it holds about you.

## What is Personal Information and how do we collect it?

Personal information is information or an opinion, whether true or not, and whether in a recorded material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

Personal information collected by the us may include an individual's name, address, date of birth, emergency contact details, occupation, bank account details, credit card information, contact details (including telephone numbers and email addresses).

We will only collect personal information about an individual where the information is reasonably necessary for one or more of our functions or activities. The kinds of personal information collected and held, how that information is collected and held and the purposes for which that information will be collected, held, used and disclosed will depend on the circumstances.

In relation to employees, personal information is collected so that we may administer our payroll function (i.e., superannuation, taxation, performance reviews) and facilitate any other matters relating to your employment.

We will take reasonable steps to ensure that the personal information that is collected, used or disclosed by us is complete and up to date. Please contact us the People & Culture team to advise if your information needs to be updated.

## Why do we collect personal information?

We collect, hold, use and disclose personal to comply with our legal obligations.

## Who we may disclose information to?

We may disclose personal information to the following third parties for the purposes listed above:

- Tesserent Group companies;
- government agencies;
- regulatory authorities; and
- our professional advisers.

We may also disclose personal information to external service providers so that they may perform services for us or on our behalf.

When we disclose personal information to third parties, we make all reasonable efforts to ensure that we disclose only relevant information and that it is accurate, complete and up to date and that the third party will comply with the Privacy Act or the NZ Privacy Act in relation to that information.

We may disclose personal information in other circumstances, where the person concerned has consented to the disclosure, or where we are expressly permitted to do so by the Privacy Act or the NZ Privacy Act.

These other disclosures may include where:

- you would reasonably expect the disclosure to occur (for example, quality assurance purposes or training);
- we are authorised or compelled by law to disclose;
- it will prevent or lessen a serious threat to someone's life, health or safety or a threat to public health or safety;
- it is necessary as part of the establishment or defence of a legal claim;
- it is requested by an enforcement agency such as the police; or
- it is a necessary part of an investigation following a complaint or incident

We are unlikely to disclose personal information to overseas recipients. However, if we do we will take reasonable steps to ensure that any such person to whom personal information is disclosed will deal with that information in a way that is consistent with the APPs and IPPs.

## Personal Information Security

We are committed to keeping secure the information you provide to us.  We take all reasonable precautions to protect the personal information we hold about you from misuse, loss, and from unauthorised access, modifications or disclosure.

If the information is no longer required by us for any purpose for which it was collected and is no longer required by law to be retained by us, we will destroy or de-identify the information.

## Access to Personal Information

You can request us to provide you with access to the personal information we hold about you.

Requests for access to limited amounts of personal information, such as checking to see what address or telephone number we have recorded, can generally be handled via email to the Payroll team.

## Making a Privacy Complaint

We recognise that even in the best run organisations things can go wrong.  Should you have a privacy complaint, please tell us as it gives us the opportunity to fix the problem.

To assist us in helping you, we ask you to gather all supporting documents about the matter of complaint, think about the questions you want answered and decide on what you want us to do.

If you remain unsatisfied with the way in which we have handled a privacy issue, you may approach an independent advisor or contact the Office of the Australian Information Commissioner or the Office of the New Zealand Privacy Commissioner as applicable. See www.oaic.gov.au for how to make a complaint.

## Amendments to this policy

This Policy may be reviewed and amended from time to time at Tesserent's discretion. The most recent version of this Policy will be available on the Group's Intranet.

Feedback on this Policy is welcome. Please direct any feedback to the People & Culture team.

Last updated: 15th October 2021