

## Privacy Policy

### 1. We respect your privacy

- 1.1. SABRENet Ltd respects your right to privacy and is committed to safeguarding the privacy of our customers, website visitors and other individuals we interact with. We adhere to the Australian Privacy Principles contained in the *Privacy Act 1988 (Cth)* (**Privacy Act**). This Privacy Policy (**Policy**) sets out how we collect and treat your personal information.
- 1.2. "Personal information" means any information or opinion about an identified or identifiable individual (a natural person).

### 2. Collection of personal information

- 2.1. SABRENet Ltd will, from time to time, receive and store personal information you enter onto our website, provided to us directly or given to us in other forms.
- 2.2. We collect personal information in order to manage and conduct our business, to provide and market our products and services and to meet our legal obligations. Depending upon the nature of your relationship with us, the type of personal information we collect and hold may include:
  - your name, phone number, address and email address;
  - your financial information (e.g. bank account details or payment history for invoicing, and/or your TFN);
  - when you provide feedback, when you provide information about your personal or business affairs, change your content or email preference, respond to surveys and/or promotions, or communicate with our customer support; and
  - any other personal information that may be required to facilitate your dealings with us.

### 3. How we collect your personal information

- 3.1. SABRENet Ltd collects personal information from you in a variety of ways, including when:
  - you interact with us directly (e.g. electronically through written information or forms you submit to us by email, by telephone or in person);
  - when you use or access our website at <https://sabrenet.edu.au> or our social media platforms, including to provide feedback or change your content or email preferences.
- 3.2. You are not required to provide us with your personal information. However, in some cases, if personal information we request is not provided, it may affect our ability to do business with you, including that:
  - we may be unable to supply the relevant product or service or to perform our obligations to you; and

#### SABRENet Limited

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enquiries@sabrenet.edu.au  
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- if you are an applicant for employment or a contractor, we may not be able to process your application.

## 4. Use of your personal information

- 4.1. SABRENet Ltd may use personal information collected from you to:
- verify your identity and communicate with you;
  - provide you with information and updates and to process your product or services order;
  - make you aware of new and additional products, services and opportunities available to you;
  - improve our products and services and better understand your needs;
  - to process, administer, collect payments from or make payments to you;
  - to assess suitability of potential employees or contractors;
  - to assess performance of current employees or contractors;
  - to respond to any feedback, queries or complaints;
  - to comply with our legal obligations, including our reporting obligations; and
  - as otherwise may be required for the general management and conduct of our business.

## 5. Disclosure of your personal information

- 5.1. We may disclose your personal information to any of our personnel, officers, 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. We may disclose your personal information for the purpose for which it was collected (or a related secondary purpose), where permitted or required by law, or otherwise with your consent.
- 5.2. Information that we collect may from time to time be stored, processed in or transferred between parties located in countries outside of Australia. These may include, but are not limited to Australia, Japan, Singapore and USA. We will take reasonable measures to ensure that any cross-border disclosure is in compliance with the requirements of the relevant Privacy Laws.
- 5.3. 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 at 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.
- 5.4. By providing us with personal information, you consent to the terms of this Policy and the types of disclosure covered by this Policy. Where we disclose your personal information to third parties, we will request that the third party follow this Policy regarding handling your personal information.

## 6. Security of your personal information

- 6.1. SABRENet Ltd is committed to ensuring that the information you provide to us is secure. We take reasonable steps to protect personal information held by us from misuse and loss and from unauthorised access, modification or disclosure, for example through the use of technical and physical security measures, including restricting access to electronic records through technical access restrictions.

## 7. Access to your personal information

- 7.1. You are entitled to access the personal information we hold about you, and may do so by contacting us using the contact details below. In processing your request, we will comply with our obligations under the Privacy Laws, noting that we may need to verify your identity before we allow you to access your personal information, and are permitted to withhold the disclosure of personal information in prescribed circumstances.
- 7.2. If you believe the personal information we hold about you is inaccurate, incomplete or out of date, please contact us. If you satisfy us that any personal information we hold about you is not accurate, complete or up-to-date, we will amend our records accordingly.

## 8. Retention and deletion of your personal information

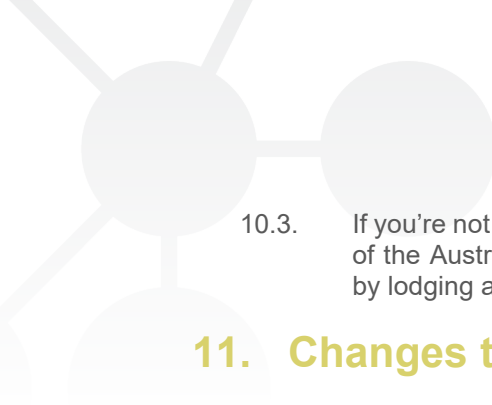
- 8.1. We will retain your personal information for as long as we require it to fulfil the purpose for which it was collected, unless a longer retention period is required for the purpose of discharging our legal, accounting and reporting requirements.
- 8.2. Where we no longer require your personal information, we will use reasonable endeavours to comply with our legal obligations in respect of that information (e.g. by de-identifying or destroying such personal information).

## 9. Marketing and opting out

- 9.1. If you consent to receiving direct marketing communications from us, we may use your personal information to contact you from time to time whether by email, phone or SMS, to identify a product or service that you may be interested in or to tell you about new products or services, special offers, promotions and events.
- 9.2. If you do not want us to contact you for these purposes, you can withdraw your consent and let us know at any time by unsubscribing from the mailing list by clicking on the link in the marketing communication or contacting the Privacy Officer (at the contact details below).

## 10. How to contact us and complaints

- 10.1. If you have any questions about personal information or are unhappy with how we've handled your personal information, please contact our Privacy Officer using the following contact details:  
  
SABRENet  
c/o GPO Box 2252  
Adelaide SA 5000  
Email: [enquiries@sabrenet.edu.au](mailto:enquiries@sabrenet.edu.au)
- 10.2. We take complaints very seriously and will respond to you as quickly as possible (usually within 20 working days of hearing from you).

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- 10.3. If you're not satisfied with how we've handled your complaint, you can contact the Office of the Australian Information Commissioner at: GPO Box 5288, Sydney NSW 2001 or by lodging a privacy complaint form at <https://www.oaic.gov.au/contact-us>.

## 11. Changes to Privacy Policy

- 11.1. This Policy is current as at December 2024. 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. Please check back from time to time to review our Privacy Policy.
- 11.2. By continuing to use our products and services, or otherwise continuing to deal with us, you accept these changes and this Policy as it applies from time to time. However, if you do not agree to an amendment, you can notify our Privacy Officer at the contact details set out below or discontinue your use.

## 12. Website

- 12.1. *When you visit our website*

When you come to our website (<https://sabrenet.edu.au/>) 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.

- 12.2. *Cookies*

We may from time to time use cookies on our website. Cookies are very small files which a website uses to identify you when you come back to the site and to store details about your use of the site. Cookies are not malicious programs that access or damage your computer. Most web browsers automatically accept cookies but you can choose to reject cookies by changing your browser settings. However, this may prevent you 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. In addition, cookies may be used to serve relevant ads to website visitors through third party services such as Google Adwords. These ads may appear on this website or other websites you visit.

- 12.3. *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 your convenience only. Links to third party websites do not constitute sponsorship or endorsement or approval of these websites. Please be aware that this Policy does not apply to those websites and that SABRENet Ltd is not responsible for any information collected by such third parties or the privacy practices of 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 personal identifiable information.