Privacy Policy

This policy outlines the ways in which DriveRisk Australasia Pty Ltd ACN 113 677 473 trading as Optix Australasia Pty Ltd ("***Company"***) and its related entities ("***We or Our***") collect, use, disclose, store, secure, manage and dispose of your Personal Information in accordance with the Australian Privacy Principles ("***the APPs***").

Where the words "***Personal Information***" are used in this policy, that expression means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

(a) Whether the information or opinion is true or not; and
(b) Whether the information or opinion is recorded in a material form or not.

The Kind of Personal Information We Collect and Hold [APP 1.4(a)]

The kind of Personal Information we collect relating to you will depend on the nature of your relationship with us.

A. Customers

If you are a customer, we will generally collect the following particulars of your Personal Information in order to provide services to you:

(a) Your name and contact details;
(b) Your credit card or bank account details;
(c) Credit checks and company searches.

B. Customer's Employees

Our technology allows us to capture video of people driving our customer's vehicles. Vehicle-mounted event video recorders capture the forward-facing view of the road and other vehicles, as well as what is going on inside the vehicle. Additional cameras may capture video around the vehicle, such as down the sides and at the rear. Our technology is fitted with sensors such as accelerometers, which measure our customer's vehicle's g-force activity. Our technology also tracks customer vehicle location and the speed at which the vehicle is travelling through the use of GPS. Our technology may also record audio of the interior of the vehicle cabin. This data is fed to our server, which can then be accessed by our customers. This data is used by our customers to monitor their driver's driving of fleet vehicles.

C. Staff, Volunteers and Contractors

If you are a current or prospective staff member, volunteer, or contractor of the Company, we will generally collect the following particulars of your Personal Information in order to engage your services:

(a) Your name, address and contact details;
(b) Your personal details, including your date and place of birth, your gender, and your designated emergency contact;
(c) Your employment history, including details of past employers or references;
(d) Your relevant skills and experience, including qualifications and driver's licence details; and
(e) Your bank account details.

Employees should note that generally, our relationship with you will be exempt from the *Privacy Act 1988 (Cth)* and as such the Personal Information we collect from you that is directly related to your employment with us need not be handled by us in accordance with the APPs. This means you are not entitled to access your employment records held by us.

D. Online Visitors

We collect website activity statistics such as the number of visitors, pages visited, time and date of visit and where you accessed our website from, so that we can make informed decisions relating to improving our website and the services we deliver. This information is anonymous and doesn't identify a person.

When you visit our website, a cookie is placed on your computer. The cookie does not contain Personal Information that can identify you but may contain information about the page you visited on our website. If you do not wish for this to occur, you can remove cookies from your computer by following the standard procedures applicable to your internet browser.

Our website may from time to time contain links to other websites. These websites may not be administered by our organisation and as such may abide by a privacy policy or standard that differs to the Company's Privacy Policy. You should consult the privacy policy outlined on each website in order to verify how that website collects, uses, discloses, stores, secures, manages, and disposes of Personal Information.

Anonymity and Pseudonymity

You are entitled to provide your Personal Information to us without identifying yourself or through the use of a pseudonym, unless:

(a) we are required by law to only deal with individuals who have identified themselves when providing the services that you have requested we provide; or

(b) we form the view that it is impractical to provide the services that you have requested we provide without being able to identify you personally.

In these circumstances, we reserve the right to not provide services to you unless you identify yourself when providing your Personal Information.

How We Collect and Hold your Personal Information [APP 1.4(b)]

We will collect the majority of customers' Personal Information directly through meetings or interview/s with you, or through telephone, email, or mail correspondence. We may also collect Personal Information through our website, customer portal or apps, as well as through various social media platforms. Driver's Personal Information will be limited to the data we collect from our in-vehicle monitoring systems. We do not collect driver names unless provided by our customer, but drivers may be able to be identified from video footage.

We currently use servers hosted by Lytx Inc. and housed offshore (primarily in the United States of America) and Microsoft Cloud storage provider/s.

The Purposes for Which We Collect, Hold, Use and Disclose your Personal Information [APP 1.4(c)]

We collect, hold, use, and disclose your Personal Information for the following purposes:

(a) In the case of potential employees - for administration and recruitment purposes;

(b) In the case of customers - to provide services to you;

(c) In the case of our customer's drivers - to provide our customers with data relating to how their vehicles are driven;

(d) Providing you with information about other services that we, our related entities, and other organisations that we have affiliations with, offer that may be of interest to you;

(e) Market research, marketing, event and promotional activities;

(f) Facilitating our internal reporting obligations, including the fulfilment of any industrial, legal, and regulatory requirements; and

(g) Analysing our products and services with the view of developing new or improved products or services.

How you may Access or Seek the Correction of Personal Information Held by Us [APP 1.4(d)]

You may access or seek the correction of any Personal Information held by us by contacting our offices using the contact details available at our website www.optix.au/contact or by written request forwarded to:

The Privacy Officer
PO Box 3618
Robina Town Centre QLD 4230 Australia

How you may Complain about a Breach of the APPs by Us [APP 1.4(e)]

If at any stage you feel we have breached the APPs in our collection, use, disclosure, storage, security, management, or disposal of your Personal Information, you may lodge a complaint with our Privacy Officer using the contact details available on our website www.optix.au/contact.

We are committed to protecting your privacy and as such, we treat all complaints very seriously. Our Privacy Officer will address your concerns with our company directors and contact you to ensure you are satisfied with our proposed resolution. If we do not respond to you within 30 days, or you are not satisfied with our response, you are entitled to

lodge a “Privacy Complaint Form” with the Office of the Australian Information Commissioner. Copies of this form and details relating to lodgement are available at www.oaic.gov.au/privacy/privacy-complaints.

Our Disclosure of your Personal Information [APP 1.4(f)]

Any Personal Information we hold relating to our customer's drivers may be accessed by the customer.

We may also disclose Personal Information to the following recipients:

(a) Our professional advisers, including our accountants, auditors, and lawyers; and
(b) Other regulatory bodies as required by law.

Other than as set out above, we will only disclose your Personal Information to a third party in one or more of the following circumstances:

(a) Where you have granted your prior consent to such a disclosure;
(b) Where you would reasonably expect us to disclose your Personal Information in order to provide the services you have requested we provide to you;
(c) Where we are required to disclose your Personal Information to a third party by law;
(d) Where it is necessary with regards to suspected unlawful activity, or misconduct of a serious nature that relates to our functions or activities;
(e) Where it will prevent or lessen a serious threat to somebody’s life, health, or safety or to public health or safety;
(f) Where it is reasonably necessary to assist in locating a missing person;
(g) Where it is reasonably necessary to establish, exercise, or defend a claim at law;
(h) Where it is reasonably necessary for a confidential dispute resolution process;
(i) Where it is reasonably necessary for the enforcement of a law conducted by an enforcement body;
(j) Where it is otherwise required or authorised by law.

Disclosure of Personal Information to Overseas Recipients [APP 1.4(g)]

We currently use servers hosted by Lytx Inc. and housed offshore (primarily in the United States of America) and Microsoft Cloud storage provider/s. Lytx staff in the USA and Company staff in Australia and South Africa have access to this information for support, troubleshooting, or analysis purposes. We may also provide video review and reporting services by Company and Lytx staff located in Australia, the USA, South Africa, or India.

Variations

The Company reserves the right to vary, replace, or terminate this policy from time to time.

Information for Company Employees Only

The following information is only relevant to those employed by the Company:

1. All Company employees must abide by this policy morning when dealing with Personal Information.
2. Any employees who require further information about this policy should contact their Manager/Director.
3. Failure to comply with this policy may result in disciplinary proceedings in accordance with the *Performance Management and Discipline Policy*.