



## PRIVACY POLICY

Acusensus Limited ACN 625 231 941 (Company)

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### 1. Acusensus Commitment to Privacy

The Company, its subsidiaries and affiliates in Australia, the United States and the United Kingdom (collectively referred to as **Acusensus**) are committed to managing personal information in accordance with the Australian Privacy Principles under the *Privacy Act 1988* (Cth) and in accordance with other applicable privacy laws.

This document sets out our policies for managing your personal information and is referred to as our **Privacy Policy**.

In this Privacy Policy, "**we**", "**us**" and "**our**" refers to Acusensus and "**you**" and "**your**" refers to any individual about whom we collect personal information.

This Privacy Policy applies to all personal information collected by us, or submitted to us, whether online or offline, including personal information collected or submitted through our website [www.acusensus.com](http://www.acusensus.com), through our official social media channel pages which we control (such as our LinkedIn, YouTube and Twitter pages), through email message that we may send to you or receive from you, as well as in administering and managing relationships with our securityholders.

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### 2. About Acusensus

Acusensus is a technology-driven, intelligent transport solutions business focussed on road safety, providing solutions for authorities to tackle their road safety issues with artificial intelligence enabled compliance solutions. One of our key solutions is the Acusensus Heads-Up Safety Solution to provide authorities a tool to discourage drivers from using their mobile phones behind the wheel.

Acusensus offers a range of products and services, including hardware rental and sale, software licensing, equipment installation, system operation and maintenance, equipment deployment services, image review and verification services, and other adjacent enforcement camera services. Acusensus has a flexible approach in which it partners with the government or enforcement agencies to help them solve their challenges within their preferred framework.

Upholding data privacy and security protections is of very high importance to Acusensus' regulatory clients, and Acusensus' solutions have been designed to have very high levels of data security and privacy protection.

Please contact us on the details listed below for a full list of the companies which comprise Acusensus and which are subject to this Privacy Policy.

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### 3. What Information Does Acusensus Collect About You?

#### **Members of the Public whose Information is Captured by our Solutions**

Our solutions operate with privacy protections as agreed with our clients (typically government or enforcement agencies). If you are interested in how personal information is used more broadly as part of a transport solution, you may want to contact the relevant government or other body. In terms of Acusensus' role, our access to and use of personal information is fairly minimal and limited to that required for our part of the operation of the overall solution. Typically, images captured and transmitted via a camera system are encrypted, and only retained on Acusensus' systems while such images could be part of an enforcement action. Ordinarily, Acusensus is not able to decrypt and view the images, although there are exceptions where this is required for the proper operation of the system.

#### **Clients and Prospective Clients and Other Business Partners**

When you enquire about our products and services or when you become a client or business partner of Acusensus, a record is made which includes your personal information.

The type of personal information that we collect will vary depending on the circumstances of collection and the kind of products and services that you request from us, but will typically include:

- personal details such as your name, title, e-mail, postal address, and other business contact details (such as your LinkedIn profile);
- information about your employer or an organisation who you represent;
- your professional details (such as your job title);
- any additional personal information you provide to us, or authorise us to collect, as part of your interaction with Acusensus; and
- other contact details regarding our interactions and transactions with you and the organisation you represent.

In rare and specific circumstances, we may collect what is classified as "sensitive information" under applicable privacy laws. We only ever do this to the extent such sensitive information is relevant to our functions and activities and in accordance with applicable privacy laws.

#### **Prospective Employees / Applicants**

We collect personal information when recruiting personnel, such as your name, title, date of birth, gender, contact details, qualifications, and work history (including references and other information included in a CV, resume or cover letter as part of the application process). Generally, we will collect this information directly from you.

We may also collect personal information from third parties in ways which you would expect (for example, from recruitment agencies or referees you have nominated). Before offering you a position, we may collect additional details such as your tax file number and superannuation information and

other information necessary to conduct background checks to determine your suitability for certain positions.

We may also collect relevant information from third party sources such as LinkedIn and other professional websites.

### **Securityholders**

We (or a share registry provider that we may engage) may also collect information to maintain securityholder information in accordance with Australian Securities Exchange (ASX) requirements, such as:

- the name of the individual securityholder and any trustee (if applicable);
- personal details relating to any Power of Attorney (e.g., the attorney's name, address, occupation, date of birth and phone number);
- bank account details; and
- your Securityholder Reference Number or Holder Identification Number.

When we collect personal information from securityholders, we may also use and disclose it for other reasons related to your shareholding, such as identity verification, providing securityholder services, sending you correspondence and documents, and responding to complaints or inquiries. We may also use your information to market our products and services, such as exclusive securityholder offers, to you.

### **Other Individuals**

Acusensus may collect personal information about other individuals who are not clients or business partners of Acusensus. This includes clients and members of the public who participate in events we are involved with; individual service providers and contractors to Acusensus; and other individuals who interact with Acusensus on a commercial basis. The kinds of personal information we collect will depend on the capacity in which you are dealing with Acusensus. Generally, it would include your name, contact details, and information regarding our interactions and transactions with you.

If you are participating in an event we are managing or delivering, we may take images or audio-visual recordings which identify you.

### **Visitors to Our websites**

The way in which we handle the personal information of visitors to our websites is discussed below.

### **What Happens if you don't provide your Personal Information?**

You can always decline to give Acusensus any personal information we request, but that may mean we cannot provide you with some or all of the services you have requested and may not be able to do business with you as effectively or meet the expectations of clients or securityholders. If you have any concerns about personal information we have requested, please let us know.

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#### 4. How and Why Does Acusensus Collect and Use Your Personal Information?

Acusensus collects personal information reasonably necessary to carry out our business, to assess and manage our clients' needs, and provide products and services to you. We may also collect information to fulfil administrative functions associated with these services, for example billing, entering into contracts with you and/or third parties and managing client relationships. We also collect personal information to administer and manage relationships with our securityholders. Acusensus may allow securityholders and other visitors to our website to sign up for alerts and otherwise communicate with us.

The purposes for which Acusensus usually collects and uses personal information depends on the nature of your interaction with us, but may include:

- responding to requests for information and other general inquiries about our products and services;
- managing our relationship with you if you are a supplier, business partner or securityholder;
- managing, planning, advertising, and administering programs and events which may be of interest to you;
- researching, developing, and expanding our products and services;
- informing you of our activities, events, products and services;
- recruitment processes (including for contractors); and
- responding to enquiries and complaints.

Acusensus generally collects personal information directly from you. We may collect and update your personal information over the phone, by email, over the internet or social media, or in person. We may also collect personal information about you from other sources, for example:

- our affiliated and related companies; and
- third party suppliers and contractors who assist us to operate our business.

Acusensus also collects and uses personal information to innovate our delivery of products and services.

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#### 5. How Does Acusensus Interact with you via the Internet?

You may visit our website ([www.acusensus.com](http://www.acusensus.com)) without identifying yourself. If you identify yourself (for example, by providing your contact details in an enquiry), any personal information you provide to Acusensus will be managed in accordance with this Privacy Policy.

Acusensus' website(s) may contain links to third-party websites. Acusensus is not responsible for the content or privacy practices of websites that are linked to our website.

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## 6. Can You Deal with Acusensus Anonymously?

Acusensus will provide individuals with the opportunity of remaining anonymous or using a pseudonym in their dealings with us where it is lawful and practicable (for example, when making a general enquiry). Generally, it is not practicable for Acusensus to deal with individuals anonymously or pseudonymously on an ongoing basis. If we do not collect personal information about you, you may be unable to utilise our products or services or participate in our events, programs, or activities we manage or deliver.

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## 7. How Does Acusensus Hold Information?

Acusensus stores information in paper-based files or other electronic record keeping methods in secure databases (including trusted third third-party storage providers based in Australia and overseas). Personal information may be collected in paper-based documents and converted to electronic form for use or storage (with the original paper-based documents either archived or securely destroyed). We take reasonable steps to protect your personal information from misuse, interference, and loss and from unauthorised access, modification, or disclosure.

Acusensus maintains physical security over paper and electronic data stores, such as through locks and security systems at our premises. We also maintain computer and network security; for example, we use firewalls (security measures for the Internet) and other security systems, such as user identifiers and passwords, to control access to our computer systems.

Our website does not necessarily use encryption or other technologies to ensure the secure transmission of information via the internet. Users of our websites are encouraged to exercise care in sending personal information via the internet.

We take steps to destroy or de-identify information that we no longer require or as required by applicable law.

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## 8. Does Acusensus Use or Disclose Your Personal Information for Direct Marketing?

Acusensus may use or disclose your personal information for the purpose of informing you about our products and services, upcoming events, or other opportunities that may interest you or as otherwise permitted under applicable privacy laws. If you do not want to receive direct marketing communications, you can opt-out at any time by contacting us using the contact details below or using the opt-out functionality contained in the electronic message.

If you opt-out of receiving marketing material from us, Acusensus may still contact you in relation to its ongoing relationship with you.

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## 9. How Does Acusensus Use and Disclose Personal Information?

### **For Clients and Other Business Partners**

The purposes for which we may use and disclose your personal information will depend on the products or services we are providing you. For example, if you have engaged us to deliver our products and services to your organisation, we may disclose information about you to service providers where required to provide your organisation with the relevant products and services.

If you are a client or participant at an event, we may disclose your personal information to our venues and service providers where this is reasonably necessary for, and relevant to, the delivery of the event. We may use images or audio-visual recordings which identify you for our business purposes where you would reasonably expect this to occur.

### **Disclosure to Contractors and Other Service Providers**

Acusensus may disclose information to third parties we engage in order to provide our products and services or administer our relationships with securityholders, including contractors and service providers used for data processing, share registry services, data analysis, client satisfaction surveys, information technology services and support, website maintenance/development, printing, archiving and mail-outs.

Personal information may also be shared between related and affiliated companies of Acusensus, located in Australia and overseas.

Third parties to whom we have disclosed your personal information may contact you directly to let you know they have collected your personal information and to give you information about their privacy policies.

### **Use and Disclosure for Administration and Management**

Acusensus will also use and disclose personal information for a range of administrative, management and operational purposes. This includes:

- administering billing and payments and debt recovery;
- planning, managing, monitoring, and evaluating our services;
- quality improvement activities; statistical analysis and reporting;
- training staff, contractors and other workers;
- risk management and management of legal liabilities and claims (for example, liaising with insurers and legal representatives);
- responding to enquiries and complaints regarding our products and services;
- verifying the identities of our securityholders and managing our relationships with them;
- obtaining advice from consultants and other professional advisers; and
- responding to subpoenas and other legal orders and obligations.

## **Other Uses and Disclosures**

We may use and disclose your personal information for other purposes explained at the time of collection (such as in a specific privacy collection notice or statement) or otherwise as set out in this Privacy Policy.

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### **10. Does Acusensus Disclose Your Personal Information Overseas?**

Acusensus is a global organisation and works with clients, service providers, sponsors, and commercial interests across the globe. It is likely that your personal information will be disclosed to overseas recipients including to service providers who may handle, process, or store your personal information on our behalf.

Unless we have your consent, or an exception under the Australian Privacy Principles applies, we will only disclose your personal information to overseas recipients where we have taken reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to your personal information.

Entities which are related entities of Acusensus, or are otherwise affiliated with Acusensus, have operations in the United States. In circumstances where your information is disclosed to overseas recipients, those recipients are likely to be located in countries in the regions in which Acusensus and its related entities and affiliates operate.

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### **11. How Can You Access or Seek Correction of Your Personal Information?**

You are entitled to access your personal information held by Acusensus on request. To request access to your personal information please contact our Privacy Officer using the contact details set out below.

We will take reasonable steps to ensure that the personal information we collect, use, or disclose is accurate, complete and up-to-date. You can help us to do this by letting us know if you notice errors or discrepancies in information we hold about you and letting us know if your personal details change.

However, if you consider any personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant, or misleading you are entitled to request correction of the information. After receiving a request from you, we will take reasonable steps to correct your information.

We may decline your request to access or correct your personal information in certain circumstances in accordance with the Australian Privacy Principles. If we do refuse your request, we will provide you with a reason for our decision and, in the case of a request for correction, we will include a statement with your personal information about the requested correction.

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### **12. What Should You Do If You Have a Complaint About the Handling of Your Personal Information?**

You may contact Acusensus at any time if you have any questions or concerns about this Privacy Policy or about the way in which your personal information has been handled.

You may make a complaint about privacy to the Privacy Officer at the contact details set out below.

The Privacy Officer will first consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint. We will generally respond to your complaint within a week.

If your complaint requires more detailed consideration or investigation, we will acknowledge receipt of your complaint within a week and endeavour to complete our investigation into your complaint promptly. We may ask you to provide further information about your complaint and the outcome you are seeking. We will then typically gather relevant facts, locate, and review relevant documents and speak with individuals involved.

In most cases, we will investigate and respond to a complaint within 30 days of receipt of the complaint. If the matter is more complex or our investigation may take longer, we will let you know.

If you are not satisfied with our response to your complaint, or you consider that Acusensus may have breached the Australian Privacy Principles or the Privacy Act 1988 (Cth), a complaint may be made to the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992 or by using the contact details on the website [www.oaic.gov.au](http://www.oaic.gov.au)

If you are located outside of Australia you may wish to take your complaint up with the local data protection authority in your jurisdiction.

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### 13. How Changes Are Made to This Privacy Policy

Acusensus may amend this Privacy Policy from time to time, with or without notice to you. We recommend that you visit our website regularly to keep up to date with any changes. We also try to let you know about major changes to our Privacy Policy (for example by putting up a notice on our website).

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### 14. How Can You Contact Acusensus?

The contact details for Acusensus are:

Acusensus Privacy Officer  
Level 6, 31 Queen Street  
Melbourne 3000 VIC  
[privacy@acusensus.com](mailto:privacy@acusensus.com)

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