

Privacy Policy

Current version: 7 August 2020

Huntsman Security is the operating name of Tier-3 Pty Limited, an Australian company and its subsidiary in the United Kingdom, Tier-3 Security Limited.

This policy outlines Huntsman Security's ongoing obligations regarding management of your personal information. Personal information is information or an opinion about an identified individual, or an individual who is directly or indirectly identifiable from that information or opinion, whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not.

1. Collecting Personal Information

We collect your personal information so that we can carry out our usual business activities related to the development and commercialisation of Huntsman Security's proprietary software. The personal information we collect from you is your business contact information and may include your name, job title, employer name, work email address, work street address and work telephone number.

Your personal information is normally collected directly from you as follows:

- via our website if you complete an online form to register for an event, to register to receive informational content or to request information on our products and services; or
- in person in the sale and provision of our products or services, or if we meet at an industry or other event.

We may also collect your personal information from a third party, such as a public website or a supplier of lead generation services.

If you register on our website to receive our restricted materials, we may ask you questions about your business. Such questions are designed to help us to tailor information to your needs and provide you with useful information about cyber security.

You may unsubscribe from our mailing lists at any time by using the 'unsubscribe' option located at the end of each email.

The consequences of not providing your personal information could be varied, depending on your relationship with Huntsman Security. For example, if you wish to register for a Huntsman Security seminar, without your personal information, Huntsman Security will not be able to register your attendance at the seminar. If you do not want to provide Huntsman Security with your personal information, you can contact Huntsman Security's Privacy Officer to discuss the specific consequences of not doing so

2. Use of Personal Information

Our use or processing of your personal information may be on the basis of your consent or on the basis that the use or processing is necessary for Huntsman Security's legitimate business interests, depending on our relationship with you.

If you have specifically opted in to receiving marketing communications from us, our processing of your personal information for marketing purposes is based on that consent.

If you have not specifically opted in to receiving marketing communications from us, our processing of your personal information for marketing purposes, and for non-marketing purposes, is that it is necessary for Huntsman Security's legitimate business interests. These legitimate interests may be any or all of the following, depending on our relationship with you:

- to undertake or manage our business relationship with your employer as a potential customer, customer, supplier or business partner;
- to promote our company and products, and to send cyber security industry relevant informational content;
- to comply with a legal action or law enforcement directive, or to protect Huntsman Security's legal rights and/or property; and
- internal purposes such as accounting, planning, record keeping and reporting.

3. Disclosure to and Processing of Personal Information by Third Parties

Huntsman Security does not disclose your personal information to third parties without your consent other than in the following circumstances:

- to those we contract directly to provide services to us, including the provision of a Customer Relationship Management solution, a marketing platform and, on occasion, a lead generation service provider;
- to those we contract directly to provide payroll services to us (employees only);
- to our business partners where your interests are better served by them;
- if legal action or a law enforcement directive requires that we must do so; or
- it is deemed necessary by us to protect Huntsman Security's legal rights and/or property.

If your personal information was collected by Huntsman Security in the United Kingdom, your information may be provided to Huntsman Security in Australia for office support functions including marketing and legal functions, record keeping and accounting purposes.

Your personal information may be transferred to an international recipient such as our CRM and marketing platform provider(s).

Huntsman Security will only use third party processors of your personal information where those processors ensure the protection of your rights in accordance with applicable law.

4. Statistical Information and Cookies

We collect statistical information about visits to our website via log files and services such as Google Analytics and Leadlander, which track pages visited, geography and the browsers used. We also leave a cookie on your computer so that, when you return to our website, you do not need to re-enter your information to download resources available through our website. If you do not want us

to leave a cookie on your computer, please disable cookies before you submit your personal information through our website.

5. Your Rights

You have certain rights in relation to our collection, use, disclosure and storage of your personal information. These rights include those listed below. If you are based in the European Union or United Kingdom you have additional rights in relation to our processing of your personal information. Those additional rights are detailed in the Privacy Notice we give you when we collect your personal information, which can also be found on our website.

a. Privacy Notice

When we collect your personal information from you or from a third party, we are required to provide you with certain information as required by applicable law ('Privacy Notice'). We will provide the Privacy Notice free of charge.

b. Access

You have the right to access the personal information we hold about you and to information regarding our use, disclosure and storage of your personal information. We will provide the information and/or access in the manner requested by you if it is reasonable and practical to do so.

c. Quality and Rectification

We are required to take reasonable steps to make sure that your personal information is accurate, complete and up-to-date. You have the right to require us to rectify any inaccurate personal information we hold about you and to have any incomplete personal information completed.

To ensure we maintain complete and accurate information about you, please take the time to advise us at the earliest opportunity of any changes to your personal information so that our records can be updated.

Local law in other countries may provide you with legal rights in addition to or in substitute of those listed above in which case Huntsman Security will comply with those laws.

If you wish to submit a request to us to access or rectify your personal information, please contact our Privacy Officer.

We will respond to your request (unless a statutory exception or limitation applies) within the time required by applicable law. We will not charge you for responding to your request unless your request is manifestly unfounded or excessive, in which case we may charge a reasonable administration fee or refuse the request.

6. Security

In processing your personal information, Huntsman Security employs appropriate technical and organisational measures to ensure a level of security appropriate to the risk presented by the processing of your personal information. In doing so, your personal information is processed in a manner that reasonably protects it from misuse, loss and from unauthorised access, modification or disclosure. Whilst these efforts are made, factors beyond our control could result in unauthorised access to or disclosure of data.

7. Duration

When your personal information is no longer needed for the purposes identified above, we will take steps to destroy or permanently de-identify your personal information. However, some personal information may be stored in documents that we are required to keep by law for the minimum periods imposed by law.

8. How to Complain

If you are dissatisfied with our handling of your personal information, including any breach of applicable privacy and data protection laws, please lodge a complaint in writing with the Privacy Officer. We will respond to your complaint within 30 days.

Alternatively (or if you do not receive a satisfactory response from us), you may be entitled to refer the matter to your local privacy or data protection authority for assistance, such as the Office of the Australian Information Commissioner or the Information Commissioner's Office in the UK.

9. Changes to this Privacy Policy

Changes may be made to this policy from time to time. Notification of substantial changes to this policy will be handled by posting an announcement on the Huntsman Security website, www.huntsmansecurity.com.

10. Privacy Officer

If you have any questions about this policy, wish to lodge a complaint or submit a request to access or rectify your personal information (or to exercise any of your other rights under applicable law) please contact the Privacy Officer at privacy@huntsmansecurity.com or:

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