

Privacy Policy

Tulich Project Management Pty Ltd (referred to as “we”, “us”, “our” or “Tulich”) takes seriously the privacy of those that visit our web site and are committed to managing personal information in accordance with the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth) (Privacy Act) and in accordance with other applicable privacy laws. . We have established this Privacy Policy to communicate what information we collect, hold, use and disclose that information. By accessing this website (www.thesaxon.com.au), you acknowledge the terms and conditions expressed herein. We reserve the right to change this policy at our sole discretion and without notice.

What information is collected, and why?

When a user visits our website, we collect information about the visit that does not identify the user personally. We track information such as the domain from which the user is visiting and the user’s browser type. We also collect specific information regarding the user’s session on our website. This includes items such as the date and time of the visit and the pages viewed.

Sometimes we ask a user to voluntarily provide personally identifiable information . This information generally includes, but is not limited to, name, e-mail address, postal address, and telephone number. We request this information when the user requests one of the following:

- To register to attend an on-line seminar or demonstration
- To receive specific information from us such as a whitepaper or code sample
- To sign up for a mailing list
- To correspond with us
- Or any other such activity that we deem necessary

Any personal information provided to us will be managed in accordance with this Privacy Policy.

Tulich does not collect any personally identifiable financial or health-related information. We do not intentionally collect information from children under the age of 13.

You can always decline to give us any requested personal information, but that may mean that:

- we cannot interact with you;
- we cannot provide you with some or all of our services; and/or
- it may affect your use of the website and the offerings we make through the website.

How is the information used?

We will use information you provide for the primary purposes of providing our services and website, which includes but is not limited to:

- providing, delivering, administering and improving our services and website, including but not limited to:
 - offering you website content;
 - providing and enhancing features of our website;
 - enabling you to use our services; and
 - customising, researching, developing, measuring, expanding and improving our services;
- personalising and improving your experience on our website and with our services;
- dealing with feedback or complaints about our website or services;
- contacting and communicating with you and providing customer support;
- managing, planning, advertising and administering on-line programs or demonstrations;
- undertaking data analytics, to better understand your requirements and preferences;
- conducting market research, business development and to innovate and improve our services;
- monitoring online activity on our website;

- undertaking and administering marketing activities, database compilation and analytics, analysis of trends and demographics and other marketing or promotional activities, including but not limited to:
 - personalising, measuring and improving our advertising;
 - contacting you to let you know about our services; and
 - delivering direct and targeted advertising and marketing to you about our services and business;
- enforcing our agreements with you;
- responding to requests for information and other general enquires;
- complying with legal obligations to which we may be subject and to resolve our disputes, including but not limited to:
 - participation in investigations and proceedings conducted by governmental or regulatory authorities and law enforcement;
 - prevention, detection and mitigation of unlawful activity or suspected unlawful activity;
 - compliance with information requests where we are legally obligated to disclose personal information;
 - retention and storage of your personal information to comply with specific legal retention requirements;
 - responding to a serious threat to an individual's life or to public health or safety; and
 - where otherwise required or authorised by law.

We will generally use or disclose your personal information for the primary purpose for which it was collected, or for a related secondary purpose where you would reasonably expect us to use or disclose the personal information for that secondary purpose. We may otherwise use and disclose your personal information if you have given us consent in accordance with this Privacy Policy for the use or disclosure or it is required or authorised by law.

We may disclose personal information to third parties, including:

- third parties we engage to provide services to us, including contractors and service providers used for data processing, data analysis, customer satisfaction surveys, information technology services and support, website maintenance/development, archiving, debt collection, payment systems, professional advice, market research and marketing and advertising;
- our employees, contractors, agents, partners, sponsors, promoters and other third parties who assist us in providing our services and website;
- courts, governmental and regulatory authorities and law enforcement, where required by law or to exercise or defend our legal rights; and
- other third parties when you have given consent to share your personal information. 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.

We 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 services;
- obtaining advice from consultants and other professional advisers; and
- responding to subpoenas and other legal orders and obligations.

We may use and disclose your personal information for other purposes explained at the time of collection or otherwise as set out in this Privacy Policy.

Unless we have your consent or an exception under the APPs 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 APPs in relation to your personal information.

Please note that some of the third-party service providers that we may disclose personal information to may be based in or have servers located outside of Australia and may therefore store, transfer or access your personal information outside of Australia.

Are "Cookies" used on the website?

“Cookies” are small pieces of information that are placed on a web user’s hard drive. We may use cookies to provide you with better service. Cookies are pieces of information that a website transfers to your computer’s hard disk for record-keeping purposes. Cookies can make the website more useful by storing information about your preferences for a particular site. The use of cookies is an industry standard, and many major websites use them to provide useful features for their customers. Cookies in and of themselves do not personally identify users, although they do identify a user’s computer. Most browsers are initially set to accept cookies. If you prefer, you can set your browser to refuse cookies. However, you may not be able to take full advantage of the functionality of the website if you do so.

How is personally identifiable information held and safeguarded?

We store information in paper-based files or other electronic record keeping methods in secure databases (including trusted 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.

We maintain physical security over paper and electronic data stores, such as through locks and 24 hour 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. Access to personal information is limited to a small number of personnel and on a need-to-know basis.

Our website does not necessarily use encryption or other technologies to ensure the secure transmission of information via the internet. Users of our website 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, unless we are required by law to retain it..

Links to other websites

Our website may contain links to other internet web sites. Tulich neither controls nor endorses external sites and is not responsible for the content of such sites. This policy does not cover the privacy policies and data collection practices of non-Tulich web sites.

Access to and correction of personal information

You are entitled to access your personal information held by us on request. To request access to your personal information please contact us using the contact details set out in the section titled “How to opt out of correspondence” of this Privacy Policy.

You will not be charged for making a request to access your personal information but you may be charged for the reasonable time and expense incurred in compiling information in response to your request.

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 APPs. 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.

Complaints about the handling of personal information

You may contact us 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 at the contact details set out in the section titled “How to opt out of correspondence” of this Privacy Policy.

We 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 thirty (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 we may have breached the APPs or the Privacy Act, 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.

How to opt out of correspondence

We may use or disclose your personal information for the purpose of informing you about our services, or other opportunities that may interest you, in accordance with the APPs.

If you do not want to receive direct marketing communications, you can:

- opt-out at any time by emailing us on info@tulich.com.au; or
- use the unsubscribe / opt-out facility provided in the most recent marketing communication.

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