



DDT Holdings PTY LTD
Privacy policy

1. INTRODUCTION

DDT Holdings values and respects the privacy of the people we deal with. We are committed to protecting private information collected by and provided to us and complying with the Privacy Act 1988 (Cth) (Privacy Act) and other applicable privacy laws and regulations, including the Australian Privacy Principles (APPs)

This document sets out DDT Holdings' policy describes how we collect, hold, use and disclose this information, and how we maintain the quality and security of this personal information.

1. PERSONAL INFORMATION WE COLLECT

Personal information includes a broad range of information, or an opinion, that could identify an individual. What is personal information will vary, depending on whether a person can be identified or is reasonably identifiable in the circumstances.

Personal information we collect includes but is not limited to-

- General identification information such as names, job title, occupation, date of birth and gender.
- Contact details such as address, email address, phone and mobile phone number and Internet Protocol (IP) address.
- Educational qualifications, employment history, salary and referee reports.
- Payment details including, payslips, and other income earning information, for example payment summaries from your employer and super fund, statements from banks and financial institutions showing interest received, employment termination payment summaries, receipts for gifts, donations and work-related expenses.
- Information contained in identification documents such as passport or driver's licence.
- Government-issued identification numbers such as tax file numbers.
- Financial information such as credit card and bank account details.
- Details of superannuation and insurance arrangements.
- Visa or work permit status and related information.

- Information about immigration status.

Sensitive Information is personal information that includes but is not limited to information or an opinion about an individual's:

- racial or ethnic origin
- political opinions or associations
- religious or philosophical beliefs
- trade union membership or associations
- sexual orientation or practices
- criminal record
- health or genetic information
- some aspects of biometric information.

We will only collect and use sensitive information with your consent, in accordance with applicable laws or in a de-identified aggregated manner and the information is reasonably necessary for one or more of the Company's functions or activities.

Where you need to provide us information about other individuals (e.g. Spouse, dependants or other family members or employees) you are required to have the authority to do the same and to inform such other individual that you are providing such information to us and to advise them about this privacy policy and how they can obtain a copy of it.

2. COLLECTION OF PERSONAL INFORMATION

2.1 Generally we will collect personal information directly from you e.g. in the company's dealings with you over the telephone, through correspondence between you and the company (electronic or otherwise), through application or other forms (supply orders/purchase orders, tender documents, employment forms etc.), in person, through transactions, through our website, via surveillance from our on-premises camera, and other technology used for communication.

1. Sometimes we will collect your personal information from outside sources. These can include marketing mailing lists and other public information (including public posts to social networking sites such as LinkedIn and Twitter) and commercially available personal, identity, geographic and demographic information. Outside sources may also include information

gained from a third party. For example, we may collect your personal information from:

2. your employer or previous employer
3. your referees
4. your personal representatives
5. a financial advisor, and/or
6. through publicly available information sources (which may include telephone directories, the internet and social media sites)
7. direct marketing database providers
8. where you have authorised disclosure to us, from banks, or
9. where you have applied for a job, from other persons, such as law enforcement agencies, the Department of Home Affairs, education or other institutions or professional organisations.

We may also collect personal information about you from your use of our websites and social media and information you provide to us through contact mailboxes.

Such personal information as is collected about you through publicly available information sources, it is managed in accordance with the APPs.

2.2 Unsolicited Personal Information is personal information that the Company receives which it did not solicit. Unless the Company determines that it could have collected the personal information in accordance with the APPs or the information is contained within a Commonwealth record, it destroys the information or takes steps to ensure it is de-identified.

3. HOLDING PERSONAL INFORMATION

We hold personal information electronic formats and in hard copies. We also engage third parties to manage our electronic data (including data in relation to the services we provide) on our behalf.

There are security measures in place to protect the personal information we hold these include amongst other things physical controls like security passes issued only to authorised personnel to enter our offices and lockable cabinets for storing of physical records.

The information stored electronically is secured through restricted access only to authorised personnel and other controls like firewalls, encryption, passwords and digital certificate).

We follow all the applicable laws which govern document retention and data breach incidents. We seek to ensure that personal information stored with us is kept as current as possible, and the information that is no longer relevant or required is deleted or de-identified as soon as reasonably practicable., this is subject to legal and regulatory obligations that may require data retention for varying periods of time.

4. PURPOSE FOR COLLECTING, HOLDING, USING AND DISCLOSING PERSONAL INFORMATION

We collect and use personal information only when we have a lawful reason to do so such as when it's our legal duty, if we have your consent and when it's in our legitimate interest to do these include but are not limited to

- 4.1 To provide our services to you or to our client in accordance with the terms of any engagement letter, service agreement or employment agreement including any related reasons such as payroll, tax, superannuation, and accounting services,
- 4.2 To provide, improve and properly manage our business activities which may include -developing new products, responding to requests or queries, verifying your identity, conducting surveys, seeking feedback,
- 4.3 To establish and maintain contact with clients, current and prospective and erstwhile, to keep them informed of our new products and services, industry developments and other related reasons,
- 4.4 For our internal administrative purpose including but not limited to processing payment transactions, charging and billing functions, detection and or prevention of fraud, identifying breaches of our terms and conditions.
- 4.5 Recruitment and Employee management functions including but not limited to pre-employment screening, contacting referees, processing applications, assessment for suitability for future positions,
- 4.6 Improving internal systems and procedures
- 4.7 For compliance purposes including quality management, risk management, conflict of interest resolution and management, external/internal audit requirements,
- 4.8 Meeting regulatory and other legal obligations,

4.9 Direct marketing

- We may use or disclose personal information (other than sensitive information) for the purpose of direct marketing including products, services offered by our company or its alliance partners
- The Company may use or disclose sensitive information about you for the purpose of direct marketing if you have consented to the use or disclosure of the information for that purpose.

5. DISCLOSURE OF PERSONAL INFORMATION

- We may disclose your information for the purposes outlined in this policy and where we may be required to do so legally.
- Your authorised representatives, advisors and referees, or any other person or entity that you have consented to share your information with
- Personnel within DDT Holdings and our professional advisors,
- Experts or other such third parties contracted for the purpose of facilitating the provision of the contracted goods /services
- Our agents, third party contractors and suppliers that assist us in our business activities
- Nominated superannuation funds,
- Government or other regulatory bodies like, the Australian Taxation Office, the Australian Securities Investment Commission and The Department of Home Affairs, professional or industry bodies or agencies, as required by or in accordance with any industry code or industry standard including foreign authorities or regulators relevant or applicable for the purposes of our contracted services.
- Such other parties that you ask us to do so or when you consent to that disclosure.

6. CROSS-BORDER DISCLOSURE OF PERSONAL INFORMATION

The Company is likely to disclose personal information to overseas recipients. Before the Company discloses personal information about you to an overseas recipient, the Company will take steps as are reasonable in the circumstances to ensure that the overseas recipient does not breach the APPs in relation to the information.

7. ACCESS TO PERSONAL INFORMATION

It's important that you make sure the personal information we hold about you is accurate, up to date and complete. If any of your details change or if you believe that any personal information DDT Holdings has collected about you is inaccurate you can contact us (via "contact us" at the end of this policy) and we will take reasonable steps to correct it in accordance with the requirements of the Privacy Act.

You can request access to your personal information that we hold about you. To make a request see 'contact us' at the end of this policy for details. We may charge reasonable costs for providing you access to your personal information.

8. INTEGRITY AND SECURITY OF PERSONAL INFORMATION

- We take all possible reasonable to ensure that the personal information that we:
 - i. collect is accurate, up-to-date and complete; and
 - ii. use or disclose is, having regard to the purpose of the use or disclose, accurate, up-to-date and complete.
- We have procedures in place to protect the personal information from misuse, interference, loss and form unauthorised access, modification, or disclosure (refer clause 3 above).
- The personal information, that is no longer needed, the information is not contained in any Commonwealth record, and we are not required by law to

retain, we will take such steps as are reasonable in the circumstances to destroy the information or to ensure it is de-identified.

9. COMPLAINTS

- You can notify us of any complaint you may have about our handling of your personal information via 'contact us' link at the end of this policy. Following your initial contact, you may be asked to set out the details of your complaint in writing in a form provided. Your complaint will be dealt with in accordance with the Company's complaints procedure and the Company will provide a response within a reasonable period.
- While we hope that we will be able to resolve any complaints you may have without needing to involve third parties, if you are not satisfied with the outcome of your complaint, you can refer your complaint to the Office of the Australian Information Commissioner.

10. CONTACT US

If you have any questions in relation to this Privacy Policy or our management of your personal information you can contact us at

Email: compliance@ddtholdings.com.au

Telephone: +61 2 83220852



This policy is recommended for approval for by the compliance team.

Approved

A handwritten signature in black ink, appearing to read "R. Saraff", is written inside the top section of a rectangular box.

Rajeev Saraff

Director of DDT Holdings Pty Ltd

Document History

Version	Date Approved	Approved by	Comments
1.0	July 2022	Board	Launch
2.0	Januaury2024	Board	Review 1