

# **Privacy Policy**

#### Introduction

Orion Satellite Systems (Orion), a trading name of IPSTAR Australia Pty Ltd, (IPSTAR) recognises the importance of privacy and is committed to protecting the privacy of individuals when handling their personal information. This Privacy Policy explains how we collect, hold, use, disclose, protect and otherwise handle personal information in an open and transparent manner in accordance with the Australian Privacy Principles contained in the Privacy Act 1988 (Cth). By providing us with your personal information you consent to us using, disclosing and otherwise handling it in accordance with this Privacy Policy as updated from time to time.

## Personal information that we collect and hold

We collect and hold personal information for purposes relating to the promotion and supply of our telecommunications products and services. For example, we may collect and hold your personal information to:

- provide you with information about our products or services (including responding to your product or service queries);
- (ii) (ii) assess your credit situation before supplying you with our products or services;
- (iii) supply you with our products or services (including making any requested product or service changes and improving our products or services); and
- (iv) (iv) comply with our legal or regulatory obligations.

The kinds of personal information that we may collect and hold include your name, date of birth, residential and postal addresses, phone number, email address, credit card and/or bank account details, driver's licence details, employment history, payment history, credit eligibility information, purchase history and service related information.

Where you do not provide us with all or some of your personal information that we request then we may not be able to supply you with our telecommunications products or services.

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### Clickstream data that we collect and hold

We may use cookies, web beacons or similar technologies to collect de-identified information about your visits to our website www.orionsat.com.au ("Website") for the purpose of improving your experience browsing our Website. For example, when you visit our Website we may collect your server address, domain name, operating system, browser type, pages accessed, documents downloaded, previous visits, referring website, and visit date and time.

Orion may also use your information so that we, our related entities and other business partners can promote and market products, services and special offers that we think will be of interest to you (which may include products, services and offers provided by a third party). This marketing may be carried out in a variety of ways (including by email, SMS/MMS, or social media or by customising on-line content and displaying advertising on websites) and may continue after you cease acquiring any products or services from us until you opt out. You may opt out by contacting us.

Orion also uses 3rd party vendor re-marketing tracking cookies, including the Google AdWords tracking cookie. This means we will continue to show ads to you across the internet, specifically on the Google Content Network (GCN) and Google Display Network (GDN). As always we respect your privacy and are not collecting any identifiable information through the use of Google's or any other 3rd party remarketing system.

The third-party vendors, including Google, whose services we use – will place cookies on web browsers in order to serve ads based on past visits to our website. Third party vendors, including Google, use cookies to serve ads based on a user's prior visits to your website. This allows us to make special offers and continue to market our services to those who have shown interest in our service.

You may set your browser to disable cookies but some parts of our Website may not function properly if cookies are disabled. Our Website does not set tracking cookies if a Do Not Track request is received from your browser.

#### How we collect and hold personal information

We will usually collect your personal information directly from you. For example, we may collect your personal information directly from you in person or by telephone, standard form, letter, facsimile, email or you visiting our Website.

We may also collect your personal information from a third party where it is unreasonable or impracticable to collect the information directly from you. For example, we may collect

credit eligibility information about you from a third party.

We may hold your personal information that we collect in both physical and electronic storage facilities including paper-based files and computer databases.

#### How we use and disclose personal information

We use and disclose personal information that we hold for purposes relating to the promotion and supply of our telecommunications products and services. For example, we may use and disclose your personal information to:

- 1. provide you with information about our products or services (including responding to your product or service queries);
- 2. assess your credit situation before supplying you with our products or services;
- 3. supply you with our products or services (including making any requested product or service changes and improving our products or services); and
- 4. comply with our legal or regulatory obligations.

Third parties to which we may disclose your personal information include your authorised representatives, our suppliers and affiliates, financial institutions, credit reporting agencies our professional advisors, and government and regulatory authorities (including law enforcement agencies).

We will not use or disclose your personal information for any other purpose without your consent except where required or authorised by law. For example, we will not sell or rent your personal information to any third party for marketing purposes without your consent.

#### How we protect personal information

We will take all reasonable steps to protect your personal information that we hold from misuse, interference and loss, and from unauthorised access, modification or disclosure using both physical and electronic security measures. For example, we will protect your personal information that we hold through the use of secure premises, authorised personnel access restrictions, locked filing, cabinets, secure databases, password access, anti-virus software, data transfer encryption and firewalls.

By providing us with your personal information over the Internet you accept that such information will be transmitted at your own risk as the security of such information cannot be guaranteed.

We will not retain your personal information if we no longer need it for any purpose for which we may lawfully use or disclose it and we are not authorised or required by law to retain it.

### Personal information access and correction

You may request us to provide you with access to any of your personal information that we hold. We will charge a fee for giving you access to your personal information more than once during any 12 month period.

You should promptly notify us if you become aware that any of your personal information that we hold is inaccurate, out-of-date, incomplete, irrelevant or misleading.

# **Privacy Policy updates**

We may update this Privacy Policy from time to time to take into account changes in our practices for the handling of personal information by publishing an amended Privacy Policy on our Website. You should regularly review the most recent version of this Privacy Policy available on our Website.

# **Our contact details**

If you require access to or seek correction of any of your personal information that we hold, or should you have any queries or require a complaint dealt with about our handling of your personal information, please contact our Privacy Officer using the contact details below:

#### **Privacy Officer**

Orion

- P: <u>08 9225 7800</u>
- E: <u>support@orionsat.com.au</u>
- Address: Orion, Level 2, 16 Victoria Avenue, Perth WA 6000

This Privacy Policy is effective as of 8 November 2016.