

Privacy Policy

Smedley Technical & Strategic Pty Ltd (ABN 64 604 667 558) ("we", "us" or "SmedTech") is committed to privacy protection. This Privacy Policy explains how we collect, use, disclose and otherwise manage personal information in accordance with the *Privacy Act 1988* (Cth) ("Privacy Act") and the Australian Privacy Principles ("APPs").

Our commitment to privacy:

We do not sell your personal information. We only disclose personal information as described in this Privacy Policy or where otherwise permitted by law.

The Australian Privacy Principles

We manage personal information in accordance with the Privacy Act, including the APPs.

What is "personal information"?

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information is true or not and whether recorded in a material form or not.

Personal information held by SmedTech may include your:

- name and role;
- residential and business postal addresses, telephone/mobile numbers and email addresses;
- technical information relating to your use of our website;
- information relating to your interactions with us;
- professional information relevant to our business relationship with you; and
- any information that you otherwise share with us.

We do not generally collect sensitive information (as defined in the Privacy Act) unless required or authorised by law or with your consent.

How we may collect your personal information

We only collect personal information that is reasonably necessary for the operation of our business and the provision of our services.

We may also collect personal information from you, or from third parties, including clients, suppliers, professional advisers, recruitment agencies and service providers, where reasonably necessary for our business activities.

Information that you provide to us

We may collect personal information that you provide to us about yourself when you:

- use this site;
- complete an online enquiry or contact form;
- provide information to us by telephone; or
- send us an email or other communication.

Technical information

We may automatically collect technical information including IP address, browser type, operating system, device identifiers, pages visited and the date and time of access.

Cookies

We may use cookies and similar technologies to operate our website, understand how users interact with our website, improve website performance and support our business activities. You may adjust your browser settings to refuse cookies, however this may affect website functionality.

In some cases, third parties may place cookies through this site. We use cookies and similar technologies to:

- operate our website;
- remember user preferences;
- understand website usage;
- improve website performance; and
- support our marketing activities where permitted by law.

How we may use your personal information

Your personal information may be used in order to:

- verify your identity;
- respond to any queries or feedback that you may have;
- conduct appropriate checks for credit-worthiness and for fraud;
- prevent and detect any misuse of, or fraudulent activities involving, this site;
- improve and develop our services, website systems and business processes;
- gain an understanding of your information and communication needs or obtain your feedback or views about our services for us to improve them;
- maintain and develop our business systems and infrastructure, including testing and upgrading of these systems;
- to comply with our legal or regulatory obligations, resolve any disputes that we may have and enforce our agreements;
- to consider your employment application;
- administer our contractual relationship with you;
- protect our legal rights; and
- for any other purpose reasonably necessary in connection with the operation of our business.

We will only send direct marketing communications where permitted by law. You may opt out at any time by using the unsubscribe facility or contacting us.

When we may disclose your personal information

We may disclose personal information to:

- service providers;
- IT providers;
- professional advisers;
- insurers;
- regulators;
- government agencies;
- law enforcement bodies;
- parties involved in a business sale or restructure; and
- other parties where required or authorised by law.

Overseas disclosures

Some of our service providers may store or process personal information overseas, including through cloud-based service providers. Where this occurs, we take reasonable steps to ensure that those providers appropriately protect your personal information and comply with applicable privacy obligations and contractual confidentiality requirements.

Contacting us about privacy

If you would like more information about the way we manage personal information that we hold about you, or are concerned that we may have breached your privacy, please contact olivia.deThierry@smedtech.com.au

If you believe we have not handled your personal information appropriately, you may make a complaint by contacting us. We will investigate and respond within a reasonable timeframe. If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner.

Access to your personal information

You may request access to, or correction of, personal information we hold about you by contacting us. We will respond to requests in accordance with the Privacy Act. We may refuse access in certain

circumstances permitted by the Privacy Act. If we refuse access or correction, we will provide reasons unless it would be unreasonable or unlawful to do so.

Storage and security of your personal information

We are committed to maintaining the confidentiality of the information that you provide us and we will take reasonable steps to protect your personal information from misuse, interference, loss and unauthorised access, modification or disclosure. In our business, personal information may be stored both electronically (on our computer systems and with our website hosting provider) and in hard-copy form. We implement reasonable administrative, technical and physical safeguards to protect personal information from misuse, interference, loss and unauthorised access, modification or disclosure.

Retention of your personal information

We retain personal information only for as long as reasonably necessary to fulfil the purposes for which it was collected, including to satisfy any legal, accounting, or reporting requirements. Where personal information is no longer needed for these purposes, and we are not required by law to retain it, we will take reasonable steps to destroy it or permanently de-identify it.

Retention periods vary depending on the type of information and the purpose for which it was collected.

Eligible data breaches

If we suspect or become aware of an eligible data breach involving personal information that we hold, we will respond in accordance with the Notifiable Data Breaches scheme under the Privacy Act, including notifying affected individuals and the Office of the Australian Information Commissioner where required.

Third party websites

You may click-through to third party websites from this site, in which case we recommend that you refer to the privacy statement of the websites you visit. This Privacy Policy applies to this site only and SmedTech assumes no responsibility for the content of any third-party websites or the privacy practices of those websites.

Changes to this Privacy Policy

From time to time, it may be necessary for us to revise this Privacy Policy, including to reflect changes in Australian privacy law. Any updated version will be published on our website and will take effect from the date of publication. We encourage you to review this Privacy Policy periodically.

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If you require any further information about the Privacy Act and the Australian Privacy Principles, you can visit the Office of the Australian Information Commissioner's website (see <https://www.oaic.gov.au/>).

Authorised By

Shaun Smedley / Director

Dated 23 July 2026