

Orbyt Corporation Limited - Privacy Policy

1 April 2021

Introduction

The Orbyt Privacy Policy (the Policy) contains important information about how Orbyt Corporation Limited (ACN 636 008 556) and its subsidiaries (Orbyt Group or we or us) collect, use and disclose personal information of its customers (You or Your).

Personal information means information that is not generally available and from which you can be identified'. We are committed to ensuring that at all times your personal information remains private and protected.

Our handling of personal information is regulated by the Australian Privacy Act 1988 (Cth) ('Privacy Act') (including the Australian Privacy Principles).

We may update this policy, so please review our website regularly.

1 What types of 'personal information' do we collect and hold?

The personal information we hold about you may include "**Identification Information**", which includes your name, address, contact details and email address used to identify you, and used to protect against fraud and unlawful activity.

2 Why do we collect your personal information?

We collect 'personal information' about you so that we can provide you with our products and services. This also enables:

- Your identification in accordance with Anti-Money Laundering / Counter-Terrorism Financing requirements;
- Design and administration of our products and services;
- Management of our risks and enables us to investigate illegal activity, such as fraud;
- Improvement of our businesses and customer experience;
- Compliance with our legal obligations and assist government and law enforcement agencies or regulators,
- Providing you with access to the Orbyt website;
- Answering your questions;
- Dealing with any complaints or concerns you may have.

We also collect your 'personal information' so that we can contact you and provide you with information about products and services that may be of interest to you.

You agree that we may use your 'personal information' for any of these purposes.

3 How do we collect personal information?

- **Directly from you** when you contact us by telephone, email or via our website.

- **Electronically** when you use our website e.g. information such as the date of and time of visits, which pages are viewed, how you navigate through the website and interact with the webpages, IP address, information about the device used to visit our website and whether you have accessed third party sites.
- **Public information** for example from public registers, social media or made available by third parties.

We may record your interactions with us, including your telephone conversations with us.

If you provide personal information to us about someone else, you must ensure that you are entitled to disclose that information to us and that we can collect, use and disclose that information as set out in this Policy without having to take any further steps required under law (such as obtain that person's consent). Thus, if you provide us with 'personal information about someone else', you must ensure that the individual understands the content of this Policy and has provided their consent to be bound by this policy.

4 How do we hold personal information?

We will take all reasonable steps to protect your personal information from misuse, loss and unauthorised access, modification or disclosure. Your personal information will always be stored in a secure online environment. All service providers we contract with are required to have a Privacy Policy and comply with the Privacy Act.

However, please note that there are risks associated with providing information to us through electronic means, example, via the internet or email and the information may be insecure in transit, particularly where no encryption is used such as through email. We therefore cannot guarantee the security of any 'personal information' that you provide to us over the internet and via email and you do so at your own risk.

5 Who do we disclose personal to?

We may also share your personal information with:

- Any related party of the Orbyt Group;
- Organisations who assist in the management and administration of Orbyt products and services;
- Government bodies including courts and tribunals or a Court, Tribunal or law enforcement agency in response to a request or subpoena or to the Australian Taxation Office.
- Persons interested in acquiring or funding us;

6 Will we use your personal information for marketing?

We may send you information about our products and services via email or other electronic means, such as through social media or targeted advertising. If you do not wish your personal information to be used or disclosed for this marketing purpose, please contact us

on privacy@orbyt.com.au to opt out, or click the 'opt out' at the bottom of any electronic communication.

7 Requesting access to, or correction of your personal information

Please help us keep your personal information up to date. If any of the personal we hold about you is incorrect or out of date, please contact us via our contact details set out at the bottom of this Policy to update the information.

If we refuse to correct personal information we will provide you with our reasons for not correcting the information.

You may request access to any of the personal information we hold about you at any time. Depending on the type of request that you make we may respond to your request immediately, otherwise we usually respond to you within 7 business days of receiving your request. We may need to contact other entities to properly investigate your request.

There may be situations where we are not required to provide you with access to your personal, for example, if it is unlawful or if the information relates to existing or anticipated legal proceedings.

An explanation will be provided to you, if we deny you access to your personal information that we hold about you.

8 Will we send your information overseas?

We may use outsourced service providers e.g. technology solutions, marketing automation, email marketing and customer service platforms which may be located in countries outside of Australia. Some of the services provided by our third-party suppliers may also be located in the cloud.

We only use highly reputable third-party suppliers and we take all reasonable steps to ensure that our suppliers abide by the standards that protect 'personal information' disclosed to us in Australia. Where we do this, we make sure appropriate data handling and security arrangements are in place.

Our terms and conditions with these third parties generally include an obligation for them to comply with Australian privacy law and with this Policy. Even though we may send your 'personal information' to a third-party provider, that provider cannot use your 'personal information' for their own purposes.

However, not all countries have the same high standards for the protection of your 'personal information' as Australia and by using our App or website or by asking us to provide you with one of our products or services, you specifically consent to us sending your data out of Australia to countries located in the Americas, Asia or Europe and also to the cloud.

9 Can you get a copy of this Policy in a different format?

If you would prefer to receive a copy of this Policy (at no charge) in a different form (hard copy or via email) please contact our Privacy Officer on the details below.

10 What if I am dissatisfied with how Orbyt has dealt with your personal information?

If you are dissatisfied or you have a complaint about our compliance with the Privacy Act you may contact our Privacy Officer on privacy@orbyt.com.au.

We will acknowledge your complaint and aim to resolve the complaint within 48 hours. We may need to ask you for further information and will provide you with a decision on your complaint within 10 days.

If you are unsatisfied with our response you can contact the Australian Privacy Commissioner (see <https://www.oaic.gov.au/privacy/privacy-complaints/> or call 1300 363 992)

11 How can you contact us?

You may contact us about any privacy related matter at:

Attention: Privacy Officer

e-mail: privacy@orbyt.com.au