

# PRIVACY POLICY (WEB)

## Privacy Policy

**Focusnet Pty Ltd (ABN 30 606 250 006), trading as FocusNet Technology**

### Introduction

Protecting your information is central to everything we do. Our Information Security Management System is ISO/IEC 27001 certified, and we apply industry best practices to safeguard the confidentiality, integrity and availability of the information entrusted to us.

### 1. Our Commitment to Privacy

Focusnet Pty Ltd (ABN 30 606 250 006), trading as FocusNet Technology ("FocusNet", "we", "our" or "us"), is committed to protecting your privacy and handling your personal information responsibly.

This Privacy Policy explains how we collect, use, disclose, store and protect your personal information in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs).

This Privacy Policy applies to personal information we collect about individuals who interact with us, including website visitors, prospective and current client contacts, enquirers, supplier and partner contacts, job applicants and other business contacts. Personal information about our employees and contractors, handled in connection with their employment or engagement, is managed under our internal privacy and employment processes and is not the focus of this public Privacy Policy.

### 2. What Personal Information We Collect

The personal information we collect depends on how you interact with us and may include:

- Name
- Company name
- Job title
- Business address
- Email address
- Telephone number
- Information submitted through our website forms
- Information provided when requesting support or making enquiries
- Information relating to products or services you receive from us
- Billing and account information
- Records of communications with us

- Website and technical information, such as IP address, device and browser details, cookie identifiers, pages viewed, referring pages and approximate location

Website and technical information may be personal information where it identifies you or is linked to other information we hold about you. We generally do not collect sensitive information (such as health information) unless it is reasonably necessary and permitted by law. Please do not submit sensitive information through our website forms unless it is necessary for your enquiry.

### 3. How We Collect Personal Information

We collect personal information when you:

- contact us by phone or email;
- submit an enquiry through our website;
- request a quotation;
- purchase products or services;
- lodge a support request;
- subscribe to newsletters or marketing communications;
- attend webinars or events;
- interact with us through social media;
- apply for employment.

We may also collect information from authorised representatives, business partners or publicly available professional sources where appropriate and lawful.

Where practicable, you may interact with us anonymously or by using a pseudonym, for example when browsing our website. However, we will usually need your contact details to respond to enquiries, provide quotations, arrange support or deliver services.

### 4. Why We Collect Personal Information

We collect personal information to:

- provide managed IT and cyber security services;
- respond to enquiries and support requests;
- manage customer accounts;
- provide quotations and proposals;
- deliver products and services;

- improve our services;
- manage supplier relationships;
- comply with legal and regulatory obligations;
- communicate important service information;
- send marketing communications where permitted by law.

## 5. Unsolicited Personal Information

Sometimes we receive personal information we did not ask for or take active steps to collect (for example an unsolicited job application or a misdirected email). Where we determine we could not have lawfully collected that information had we requested it, and it is lawful and reasonable to do so, we will destroy or de-identify it as soon as practicable. Otherwise, we will handle it in accordance with this Privacy Policy.

## 6. Website Analytics and Cookies

Our website uses cookies and similar technologies to keep the site working, understand how visitors use it, and measure the performance of our website. The information collected may include your IP address, device and browser details, cookie identifiers, pages visited, referring pages and approximate location. This information may be personal information where it identifies you or is linked to other information we hold.

When you first visit our website, a consent banner allows you to accept the use of non-essential cookies. Non-essential cookies (such as analytics) are not loaded until you accept. If you do not accept, these cookies are not set. You can also control or remove cookies at any time through your browser settings; if you do so, you can still use most of our website, though some analytics and performance features may not work as intended.

The categories of cookies and technologies we use are:

- Essential and functional cookies - required for the website to operate, including website security and content-delivery services (Cloudflare), performance caching (LiteSpeed) and site-builder functionality. These do not require consent.
- Statistics cookies - used to measure website traffic and usage through Google Analytics. These are not loaded until you accept the consent banner.
- Marketing cookies - used for advertising measurement and conversion tracking through Google Ads. These are not loaded until you accept the consent banner.

We use Google Analytics, a web analytics service provided by Google LLC, to understand how visitors use our website. Information generated about your use of the website (including your IP address) may be transmitted to and stored by Google. You can read how Google handles this information in

the Google Privacy Policy at [policies.google.com/privacy](https://policies.google.com/privacy) and in Google's information for partner sites at [policies.google.com/technologies/partner-sites](https://policies.google.com/technologies/partner-sites).

We also use Google Ads, an advertising service provided by Google LLC, to measure the effectiveness of our advertising and to understand how visitors interact with our campaigns. This may involve conversion tracking cookies that are only loaded after you accept the consent banner. You can read how Google handles this information in the Google Privacy Policy at [policies.google.com/privacy](https://policies.google.com/privacy).

We collect IP address information for the security and integrity of our website. IP addresses may also be recorded when you submit a website form and in our cookie-consent records.

## 7. Marketing Communications

From time to time we may send information about our products, services, events or cyber security updates, where permitted under the Spam Act 2003 (Cth) and the Privacy Act. Our marketing messages identify FocusNet as the sender and include a simple unsubscribe option. You may unsubscribe at any time by following the unsubscribe link in our emails or by contacting us directly. Opting out of marketing will not affect service, security, billing or account messages about services you have requested.

## 8. Disclosure of Personal Information

In order to provide the best service possible for our clients we may disclose personal information to:

- technology vendors and cloud service providers;
- website analytics and advertising providers (Google Analytics and Google Ads);
- content delivery and website security providers (such as Cloudflare);
- telecommunications providers;
- payment processors;
- professional advisers (legal, insurance, accounting);
- contractors engaged to provide services;
- government agencies, regulators or law enforcement where required or authorised by law.

We take reasonable steps to ensure these providers handle personal information consistently with the Act and the APPs. We do not sell personal information to third parties.

## 9. Overseas Disclosure

We host our own website infrastructure in Australia and do not routinely transfer personal information to overseas business partners. However, a limited number of the third-party services we use may store or process information outside Australia. Specifically, we use Google Analytics and Google Ads, provided by Google LLC (United States), and Cloudflare content-delivery and website-

security services, which operate a global network. These services may process limited technical information, such as your IP address and usage data.

Before disclosing personal information to overseas recipients, we take reasonable steps intended to ensure the recipient handles it consistently with the APPs.

## 10. Security of Personal Information

Protecting customer information is fundamental to our business. We maintain our ISO/IEC 27001 certification and implement security controls designed to protect personal information from unauthorised access, disclosure, alteration or loss. These controls include, where appropriate:

- Multi-Factor Authentication (MFA)
- Encryption in transit and at rest
- Access controls based on least privilege
- Security monitoring and logging
- Vulnerability management
- Staff security awareness training
- Secure backup and disaster recovery processes

While no method of transmission or storage can guarantee absolute security, we continually review and improve our security practices.

## 11. Data Retention

We retain personal information only for as long as necessary to provide our services, comply with legal obligations, resolve disputes and enforce contractual rights. When personal information is no longer required, it is securely destroyed or permanently de-identified.

## 12. Access and Correction

You may request access to the personal information we hold about you, and ask us to correct it if you believe it is inaccurate, incomplete or out of date. We will respond within a reasonable period. We may decline access or correction where the Act permits, and where we do, we will give you our reasons and the options available to you. Requests should be submitted using the contact details below.

## 13. Data Breaches

If we become aware of an eligible data breach involving personal information, we will respond in accordance with our Incident Response Plan and the Notifiable Data Breaches (NDB) scheme in Part IIIC of the Privacy Act 1988 (Cth), including notifying affected individuals and the Office of the

Australian Information Commissioner (OAIC) where required. You can read more about the NDB scheme at [oaic.gov.au/privacy/notifiable-data-breaches](http://oaic.gov.au/privacy/notifiable-data-breaches).

#### 14. Third-Party Websites

Our website may contain links to third-party websites. We are not responsible for the privacy practices or content of those websites.

#### 15. Complaints

If you believe we have breached the Australian Privacy Principles, you can complain to us in writing using the contact details below. We will investigate and aim to respond within a reasonable period, and will let you know if we need more time. If you are not satisfied with our response, you may complain to the Office of the Australian Information Commissioner (OAIC) at [oaic.gov.au](http://oaic.gov.au) or on 1300 363 992. The OAIC will generally expect you to have raised your complaint with us first.

#### 16. Changes to this Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in legislation, technology or our business practices. The current version will always be available on our website. (, identified by the version number and dates shown at the top of this page.)

#### 17. Contact Us

If you have any questions, wish to access or correct your personal information, or wish to make a privacy complaint, please contact us:

##### **Focusnet Pty Ltd (trading as FocusNet Technology)**

28 Brown Street, East Perth, Western Australia 6004

Phone: 1300 077 777

Website: <https://www.focusnet.com.au>