

PRIVACY POLICY

SenSen Networks Limited (SenSen)

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Privacy Policy

SenSen Networks Ltd (SenSen, we, us, our) is committed to protecting your privacy and ensuring you have a positive experience when you deal with us, both in person and on our website.

If you give us personal information, we will treat it according to this Privacy Policy. SenSen is bound by the Australian Privacy Principles (“APP” or “Principles”) as set out in the Privacy Act 1988 (Commonwealth). This Privacy Policy details how we generally collect, hold, use and disclose personal information and your rights in relation to the personal information that we hold about you.

We encourage you to read this Privacy Policy and to keep it for future reference.

Collection of your Personal Information

This Privacy Policy sets out how and why we collect and use your Personal Information. Personal Information means any information that can be reasonably used to identify you as an individual, and may include, but is not limited to, your name, email address, postal or other physical address, title, occupation, and other information.

Some of the purposes for which we collect your Personal Information include:

- providing you with information about SenSen's facilities, products, services
- providing you with information about other businesses that may add value to your experience of SenSen products and services
- to gain information about consumer and retail habits and behaviour
- to monitor your automotive parking, speeding and related behaviour
- to verify and validate your actions in a gaming setting monitored by our products
- to analyse and provide reports and data on your transport, retail and gambling behaviour and preferences
- providing products and services to our customers
- participation in discussion groups or forums
- activities in support of the above including administration, employment, management, marketing, contracting, online and mobile marketing, IT, legal, security, customer support, finance (including credit control) and human resources

Personal Information we may collect about you

We may collect personal information that you choose to give us via online forms, social media comments, by email, or through video capture or data capture which may include:

- your name, date of birth, gender
- your contact details, which may include postcode, postal, residential or business address, telephone number, facsimile number, email address,
- video footage,
- (for ITS products only) your vehicle details including tag/registration,
- location data,
- your consumer preferences,
- (for gaming products only) your gaming preferences,
- information we may require in order to provide you with a service,
- insurance policy information and
- any other information you include in a communication to us including complaints

Other personal information

Circumstances we may collect other information about you, for example:

- we may combine Personal Information about you with other information sourced from a third party to develop a persona to help us predict your retail, automotive and gambling preferences and behaviours
- if you send us an email, we will retain the content of the email (including the sender address) and our response to you where we consider it necessary to do so
- If you apply for a position with us, we may collect information to help us decide your application, including your contact details, date of birth, work history, academic history, referees, tax file number, medical and relationship status and similar details
- if you request information from us (for example about a facility, product, service or event) or register a complaint, we collect information about your request or complaint;

Google Analytics

We use Google Analytics to collect information about the use of our sites. Google Analytics collects information about your visit to our sites but does not collect your Personal Information. Some of the information Google Analytics collects includes:
your server and IP address;

- the name of the top-level domain (for example, .gov, .com, .edu, .au);
- the type of browser used;
- the date and time you accessed the site;
- the pages accessed and documents downloaded
- the previous site you visited; and
- domain site cookies.

Although Google Analytics adds a permanent cookie on your web browser to identify you as a unique user the next time you visit this site, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to this site is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. You can prevent Google Analytics from recognising you on return visits to this site by disabling cookies on your browser.

Google Analytics is a tool to measure website traffic and usage. You can opt out of the collection of this information using a tool like the [Google Analytics Opt-out Browser Add-on](#).

Domain site cookies

We may use cookies. A cookie is a small text file which may be placed on your Internet browser and which we access each time you visit a website. We use cookies for security and to build up a picture of the sites, products and services you prefer, so that we can then provide you with a personalised experience of our websites and provide you with information of interest to you.

How we collect information about you

Mostly we collect your personal information directly from you, for example when you:

- park your car in a car park monitored by our products,
- enter a retail or other environment monitored by our products,
- participate in a gaming setting monitored by our products,
- do some other act monitored by our products, and
- apply for roles at SenSen
- use our website
- contact us

Sometimes we collect personal information about you from another person or business, or from a publicly available source. For example:

- our service providers may provide us with your personal information from websites, mobile sites, social media sites, other technology-based sources, location-based sources and composites of any of these sources
- your employer may give us your details in relation to a supply or sales contract or provision of a product or service, or your participation in an even
- government road and traffic authorities
- service providers to government authorities
- employment at SenSen

You must only provide us with personal information about someone else if that person consents to you doing so and to us collecting, holding, using and disclosing their personal information in accordance with our Privacy Policy.

Uses of your Personal Information

We will only use your Personal Information for the purpose it was collected. We will not subsequently change the way we use your Personal Information without your consent or unless we are required to do so by law.

Some of the ways we may use your Personal Information include:

- To keep you up to date on the latest SenSen products and services. This may include information from other business operators that can add value to your experience of SenSen products and services
- To assist the enforcement of laws
- To improve road safety
- To improve security
- To provide marketing or promotional activities on the SenSen website.
- To conduct questionnaires and surveys in order to provide better services to our customers and end users.
- To support applications for employment
- To provide products, services for our customers
- To understand more about you, so we can provide better products and services to our clients
- To meet contractual obligations
- To improve our products and services for our customers
- For the purposes for which it was collected

Sharing your Personal Information

Your Personal Information may be disclosed to personnel of SenSen, and may be disclosed to our service providers, contractors and clients in order to allow us to perform our functions and to provide services to our clients.

We may share your Personal Information and any other additional information available to us for our clients or law enforcement to investigate, prevent, or act regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or as otherwise required by law. Contracts we enter with other parties for the provision of services may require us to disclose your Personal Information to them. In those cases, our contracts require other parties providing services to us to observe the terms of this Privacy Policy.

Accuracy of your Personal Information

We will make reasonable endeavours to ensure that our records of the Personal Information you have shared with us are accurate, relevant, up to date, complete and not misleading. However, we need your help in doing this. Please notify us of any changes to, or errors in, your Personal Information.

Overseas disclosure

Overseas disclosure

SenSen discloses personal information to its overseas related entities in order to provide its products and services. SenSen takes reasonable steps to ensure that all Personal Information is handled in a manner that is consistent with the Australian Privacy Principles. SenSen has staff located in Canada, India and Singapore.

Sensitive information

SenSen does not collect sensitive such as an individual's race or ethnic origin; political opinions, membership of a political association; religious beliefs or affiliations; philosophical beliefs; membership of a professional or trade association membership of a trade union; sexual preferences and practices; criminal record; or health information.

Security of your Personal Information

SenSen is committed to protecting the Personal Information you share with us. We utilize a combination of industry-standard security technologies, procedures, and organizational measures to help protect your Personal Information from unauthorised access, use or disclosure.

While we strive to protect your Personal Information, we cannot ensure the security of the information you transmit.

We recommend that you take every precaution in protecting your Personal Information when you are on the Internet. For example, change your passwords often, use a combination of letters and numbers when creating passwords, and make sure you use a secure browser. You can visit the Linksys website for more tips for using security features when connected to the Internet using a router.

We hold your personal information in:

- computer systems;
- electronic databases;
- digital records;

These storage mechanisms may be managed or administered internally by SenSen or by a third party storage provider with whom SenSen has a contractual relationship and be either managed locally and/or overseas.

SenSen will take all reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure. The ways we do this include:

- limiting physical access to our premises;
 - restricting electronic and physical access to personal information we hold;
 - having backups to deal with major business interruptions;
 - maintaining technology security products;
 - security audits;
- and
- destroying or de-identifying personal information pursuant to the law and our record retention policies

Accessing your Personal Information

You have a right to access Personal Information you have shared with us, subject to some exceptions permitted by law. If you would like to access your Personal Information, please let us know. For security reasons, we may require you to put your request in writing.

SenSen Networks reserves the right to charge a fee for retrieving and providing access to your Personal Information.

In summary, you have the right to:

- request access to your personal information (known as a data subject access request)
- request rectification of incomplete or inaccurate personal information that we hold about you.
- request erasure of your personal information. We must comply unless there is a reason for us to continue to hold and process it
- object to processing of your personal information in certain circumstances, for example, if you feel our processing impacts on your fundamental rights and freedoms.
- request restriction of processing of your personal information.
- request the transfer of your personal information to you or to a third party.
- withdraw your consent if we are relying on consent to process your personal information.

To exercise any of the above rights please contact us as per the contact details below.

Marketing

As described above, we may use your personal information, including your contact details, to provide you with information about facilities, products, services and events, including those of third parties, which we consider may be of interest to you.

We may also provide your details to our service providers for specific marketing purposes, including to build a profile of your consumer behaviour.

Unsubscribing

You may opt out at any time if you no longer wish to receive marketing information from us. Each email we provide includes instructions on how you can unsubscribe from that service. You may also unsubscribe from SenSen's various marketing communications by contacting us per the contact details below.

Do Not Track

Do not track is a voluntary program among Internet advertisers that is intended to give users the ability to opt-out of interest-based advertising. There are a few ways in which your computer may transmit a "do not track" signal to certain websites and online services you visit, and currently no standard has been established. We do not respond to do not track signals, and the settings in your browser will have no effect on the SenSen website or any SenSen apps.

Privacy Officer/ Data Protection Officer

SenSen's Privacy and Data Protection Officer can be contacted as per below in the "How to contact us" section.

Privacy Complaint

In order to properly and efficiently respond to your privacy complaint you should ensure to include the following:

1. What happened?
2. When did it happen or come to your attention?
3. Where did it happen?
4. Who was involved?
5. What Privacy Policies do you believe have been breached?

6. How do you believe your personal information has been mishandled?
7. What outcome are you seeking?
e.g. data leakage

How to contact us

For further information, or to contact us on any matter described in this Privacy Policy, please email us at privacy@sensennetworks.com. You should hear from us within five business days. If you are not satisfied with our response, you may also contact the relevant regulator such as the Australian Information Commissioner.

Or write to us at:

Information Security Manager
SenSen Networks Ltd
Unit 4, 71 Victoria Crescent, Abbotsford
VIC 3067 Australia

Office of the Australian Information Commissioner

GPO Box 5218
Sydney NSW 2001

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Online: <https://www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint>

Changes to this privacy policy

We encourage you to review and check our website for any updates to this Privacy Policy. Any updates to this Policy will be published on this website.