



## RCT's Privacy Policy

1. Remote Control Technologies Pty Ltd, a company registered in Australia and its related body corporates (collectively "**RCT**") are committed to protecting your privacy and complying with applicable privacy laws (including the European Union's General Data Protection Regulation ("**GDPR**") and the Australian Privacy Principles).
2. This Privacy Policy ("**Policy**") relates to the collection and use of personal data ("**Personal Data**") that you or your organisation provides to RCT during the course of your dealings, interactions or communications with RCT.
3. This Policy aims to inform you of the following:
  - (a) The purposes for our collection of your Personal Data;
  - (b) What types of Personal Data we collect;
  - (c) How we collect your Personal Data;
  - (d) How we use your Personal Data;
  - (e) How we protect your Personal Data;
  - (f) Your rights in relation to the Personal Data that we collect from you.

### What Personal Data do we collect?

4. The underlying principle is we will only collect Personal Data if it is reasonably necessary for any of the following purposes:
  - (a) To provide goods and services to you or to your organisation including:
    - (i) the design, manufacture and/or installation of automation, safety and productivity products and solutions;
    - (ii) site audits and consultation services;
    - (iii) product maintenance services;
    - (iv) fleet servicing;
    - (v) skills training;
    - (vi) distribution services;
    - (vii) customer support services.
  - (b) To enable you or your organisation to use RCT's goods, equipment or software (for example, whenever you log in to use RCT's SmarTrack fleet management system or enter into RCT's End-User Licence Agreement);
  - (c) To carry out our business functions and activities:
    - (i) establishing or reviewing customer accounts;
    - (ii) identification of the individuals in your organisation who are authorised to deal with us;

- (iii) processing payments, billing, accounting;
  - (iv) procurement;
  - (v) research and development;
  - (vi) sales and marketing;
  - (vii) product management.
- (d) To manage our ongoing business relationship with you and your organisation;
  - (e) To comply with our legal obligations including reporting to authorities, regulators or government bodies;
  - (f) To improve our products and services;
  - (g) To improve our interactions with you (for example, your experience in using RCT's website); and
  - (h) Any other purposes that related to or are incidental to the purposes in paragraphs 4(a) to 4(g).

(collectively the “**Purposes**”)

5. The type of Personal Data that we collect would depend on the specific Purpose. They may include:
- (a) contact information;
  - (b) name, date of birth, home address, telephone number and email address;
  - (c) credit card/bank account details.

#### **How do we collect your Personal Data?**

6. In most cases, we will collect Personal Data directly from you. However, we may also collect your Personal Data through the following means:
- (a) publications including newspapers, magazines, journals;
  - (b) written correspondence including letters, emails, text messages;
  - (c) industry referrals;
  - (d) marketing promotions and communications from RCT;
  - (e) telephone conversations;
  - (f) when you submit your details to RCT through our website (or other electronic platforms);
  - (g) when you register or log into RCT's systems or software;
  - (h) at events and conferences (for example, trade expo, exhibition, conference, networking functions, seminar, training etc) where you provide your personal data to us;
  - (i) publicly available sources;

- (j) RCT's website (including through the use of cookies); and
  - (k) social media, including but not limited to Facebook, LinkedIn and Twitter.
7. In some circumstances, we may collect Personal Data from third party sources (for example, credit reporting bodies, government agencies, professional market research providers).

#### **How do we use your Personal Data?**

8. We treat the Personal Data that we hold as strictly confidential. We will use and disclose your Personal Data if it is reasonably necessary for us to achieve any of the Purposes.
9. We may disclose your Personal Data with the following persons if they reasonably require your Personal Data to perform the Purposes:
- (a) RCT's related body corporates (including RCT's overseas subsidiaries);
  - (b) RCT's employees and contractors;
  - (c) Service providers who provide services and administrative support to RCT;
  - (d) Authorities, regulators or government agencies (if required).

#### **Direct marketing**

10. RCT may, from time to time, use or disclose your Personal Data for the purpose of direct marketing if RCT reasonably believes that you may have an interest in RCT's products, services or information.
11. We will provide marketing related information and communications to you if you have consent to receive these information. You may opt out at any time from such communications by submitting a request to us.

#### **Transferring your Personal Data overseas**

12. As RCT has global operations, we may transfer or share your Personal Data with RCT's related body corporates (if required) for the Purposes.

#### **Storage of Personal Data**

13. RCT will take appropriate technical and organisational measures to keep your Personal Data confidential and secure, in accordance with our internal procedures.
14. We will take appropriate security measures to protect your Personal Data against unauthorised or unlawful processing and against accidental loss, destruction or damage.

#### **Ensuring your Personal Data is up-to-date**

15. If your Personal Data changes, you may update them by contacting RCT. RCT will endeavour to update the changes within 7 days.
16. RCT will use its best endeavours to maintain accurate and up-to-date records of your Personal Data.
17. RCT will not be responsible for or be held liable for any inaccurate or incomplete Personal Data that you provide to us.

### **How long do we retain your Personal Data**

18. We will delete your Personal Data when it is no longer reasonably required for the Purposes or if you withdraw your consent to our storing and use of your Personal Data for the Purposes.

### **Your Rights**

19. Under the GDPR, you have a number of rights including but not limited to:
- (a) Access to your Personal Data and related information;
  - (b) Require us to rectify any inaccuracies or mistakes in your Personal Data that we hold;
  - (c) Withdraw any consents that you have given to us;
  - (d) Require us to erase your personal data that we hold in the situations prescribed by the GDPR (for instance, your personal data is no longer necessary for the Purposes);
  - (e) The right to restrict us from processing your Personal Data in certain situations;
  - (f) The right to receive your Personal Data which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party (if you direct us to do so);
  - (g) The right to object at any time to processing of your Personal Data for direct marketing purposes.
20. If you would like to exercise any of your rights under the GDPR, please:
- (a) complete our enquiry form on our website,
  - (b) email or write to us;
  - (c) provide us with sufficient information so that we can identify you.

### **Updates to this Policy**

21. RCT reserves the right to vary or modify this Policy from time to time. You should review this Policy periodically to ensure that you are aware of any changes to this Policy.

### **Contact us**

22. If you have any concerns about your Personal Data or this Policy, please contact us by sending an email to: [info@rct-global.com](mailto:info@rct-global.com) or send a letter to us at the following address:

Remote Control Technologies Pty Ltd  
Unit 3, 511 Abernethy Road, Kewdale  
Western Australia 6105

Attention: Legal Counsel