



RCT'S PRIVACY POLICY

1. Remote Control Technologies Pty Ltd, a company registered in Australia and its subsidiaries (collectively "**RCT**") are committed to protecting your privacy and complying with the Australian Privacy Principles and any other privacy or personal data protection laws (to the extent applicable to RCT).
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 supply goods and/or services to you or to your organisation;
 - (b) To establish commercial arrangements and contracts with you or your organisation;
 - (c) To manage our ongoing business relationship with you and your organisation;
 - (d) To enable you or your organisation to use RCT's goods, equipment or software (for example, whenever you operate RCT's Control Master system, log in to use RCT's SmarTrack Global portal);
 - (e) To carry out our business functions and activities:
 - (i) establishing or reviewing customer accounts;
 - (ii) verification and identification of the individuals in your organisation who are dealing with us;
 - (iii) processing payments, billing and accounting;
 - (iv) procurement of goods and services from suppliers or contractors;
 - (v) training your personnel in the use and operation of RCT's goods and equipment;
 - (vi) sales and marketing;
 - (f) To comply with our legal obligations including reporting to authorities, regulators or government bodies;
 - (g) To improve our products and services;

- (h) To improve our interactions with you (for example, your experience in using RCT's website); and
- (i) Any other purposes that related to or are incidental to the purposes in paragraphs 4(a) to 4(h).

(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) written correspondence including emails, letters, electronic communications;
 - (b) telephone conversations;
 - (c) when you submit your details to RCT through our website (or other electronic platforms);
 - (d) when you provide your Personal Data to us as part of our internal business processes;
 - (e) when you register or log into RCT's systems, app or software as a service;
 - (f) at events and conferences (for example, trade expo, exhibition, conference, networking functions, seminar, training etc) where you provide your personal data to us;
 - (g) publicly available sources;
 - (h) RCT's website (including through the use of cookies);
 - (i) social media, including but not limited to Facebook, LinkedIn etc.
- 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 service and 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 consented to receive these information. You may opt out at any time from such communications by submitting a request to us.

Use of Cookies

12. RCT uses cookies in its website (<https://rct-global.com/>) and may also use cookies in other proprietary software applications (e.g. <https://smartrackglobal.com/>) that RCT provides or makes available to you (“**Apps**”). Cookies are small text files which are downloaded to your device when you use the Apps. Cookies are useful because they allow the Apps to recognise a repeat visitor of the Apps.
13. We may use the following types of cookies:
 - (a) Session cookies - these are cookies that are stored temporarily on your device while you are using the App. The cookies will be deleted when you close the internet browser;
 - (b) Persistent cookies – these are cookies that stay on your device until you delete them.
14. We may use cookies for various purposes including:
 - (a) To remember your preferences in the App;
 - (b) To personalise your experience when using the App;
 - (c) To enable you to navigate the App more efficiently;
 - (d) To help us understand how the App is used so we can better improve its ease of use, functionalities and features;
 - (e) To analyse which areas of the App are visited and used most frequently;
 - (f) To measure and optimise our marketing effectiveness.
15. If you do not want us to deploy cookies in your device, you may be able to opt out by setting your device or rejecting all or some of the cookies. However, you may not be able to use the App if you reject the cookies or you may not be able to fully use some of the functionalities or features.
16. Please note that RCT is not responsible for and it has no control over a third party’s use of cookies in its website or app which may be linked to or accessible through the Apps. We strongly encourage you to read the third party’s privacy notice and cookies policy and to raise any concerns that you may have with the relevant third party.

Transferring your Personal Data overseas

17. 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

18. RCT will take appropriate technical and organisational measures to keep your Personal Data confidential and secure, in accordance with our internal procedures.
19. 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

20. If your Personal Data changes, you may update them by contacting RCT. RCT will endeavour to update the changes within 7 days.
21. RCT will use its best endeavours to maintain accurate and up-to-date records of your Personal Data.

22. 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

23. 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

24. You may have a number of legal 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 in certain situations;
 - (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.
25. If you wish to exercise any legal rights that you may have, please:
- (a) email, write or submit an enquiry form on our website; and
 - (b) provide us with sufficient information so that we can identify you.

Updates to this Policy

26. 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

27. If you have any concerns about your Personal Data or this Policy, please contact us by sending an email to: legal@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