

Our Privacy Policy

Des Allen Pty Ltd. ABN: 58-166-075-136

Privacy Statement

Des Allen Pty Ltd. (“DAPL”) respects the rights to privacy and is committed to safeguarding the privacy of our clients, customers and visitors to our website(s) or by clients using any of our software applications. This Privacy Policy explains how we collect, store, use and disclose personal information.

Similarities exist between Information Privacy Acts across the globe and our privacy policy will be continuously updated to accommodate these accordingly, to establish international compliance.

Des Allen Pty Ltd. has chosen to voluntarily “Opt in” to ensure compliance with the Office of the Australian Information Commissioner’s (“OAIC”) Privacy Act 1988.

Any queries regarding our Privacy Policy, please make contact via our “Contact Us” page on our website, desallen.com, and we will be happy to assist.

Purpose of Collecting of Personal Information:

Personal information is collected in order that we can:

- Identify our clients, prospective clients, their representatives and 3rd Party service providers that support or require our services.
- Deliver our services and service requirements directly to our individual clients, their personnel and other 3rd Parties that operationally support them.
- Perform our management and administrative duties to support our clients including quality assurance, complaints and problem resolution.
- Obtain feedback and comment on our products and services
- To develop further and implement solutions to improve and enhance our products and services.

Personal Information We Collect:

To allow us to provide our products and services to Clients (businesses and organisations), we require legitimate, minimal yet essential information about the organisation and personal information regarding the individuals within the organisation.

Without this personal information, we cannot deliver our products and services and the client can not obtain the benefits from the services on offer.

The type of direct information required is kept to a minimum and includes Company Name, Email address, Tel. no.; Company Hierarchal Structure; Individuals' Names, Individuals' Company Email address and/or their Mobile Phone no.; IP address (required during the use of our software application, but not displayed or disclosed).

Information defined in the Privacy Act 1988, as "Sensitive Information" e.g. Religion, ethnicity, gender, associations, etc.) is not collected. If however, this was to change, and we were required to store Sensitive Information, we would seek written permission and request the purpose of collecting such sensitive information and ensure the appropriate compliance requirements were followed and maintained.

NB: It must be noted, that although Des Allen Pty Ltd. can deliver its' services through 3rd Party Consultants we are bound by the OAIC Privacy Act 1998 and acknowledge that our products are used by 3rd Party's and/or their Clients using the services to 'collect' personal information and so expand upon their privacy commitments through this privacy policy and other confidentiality agreements that may be in place between the parties.

How Personal Information is Collected:

Personal information is collected through normal channels of inquiry and interactions with interested parties and existing and potential clients, and in particular those that purchase a licence for our software products.

In the vast majority of cases solicited personal information will be collected electronically via the Client (Company or Organisations) as *they already hold* the personal information required by the Des Allen Pty Ltd. licensed software application product. This is presented for collection and processing either directly by the client or by the 3rd Party Consultant, acting on behalf of the client, as they conduct their agreed services.

Individuals' personal data is only collected or processed based upon consent. This consent will be either from the individuals and/or from the client giving consent to process the data on behalf of the individual's (company employee, if a client-employee contractual agreement has been agreed and signed).

DAPL are not involved directly in the entering of personal information, however has requirements that 3rd party and client has in place their own privacy policies that conform to local compliance authority regulations.

Storage, Access and Security of Personal Information:

Personal Information access is limited to personnel who specifically need it to carry out their duties and business responsibilities. This may apply across 3 potential APP Entities:

- The Clients personnel, authorised to use the registered and licensed software
- A 3rd Party(s) that support the client with their services in the use of the registered and licenced software. E.g. Client Consultants; SMS/Text Services
- Des Allen Pty Ltd. support personnel, where specific support requirements require the accessing of the clients' server database which stores the personal information.

To maintain privacy and security, Client consent to access the database and correct any reported issues, must be obtained.

As part of our software and storage service delivery to keep data safe, we have in place suitable managerial, manual and electronic procedures and have taken reasonable steps to ensure clients personal information is kept secure from unauthorised access, misuse or loss.

Des Allen Pty Ltd. partners and/or associates and any 3rd Party consultant or consultancy are contractually bound to respect the confidentiality of any personal information held by us and to comply with local governing legal data protection regulations.

To assist us in protecting personal information privacy, clients must maintain secrecy of their access codes and credentials when accessing our website and/or web application software.

Disclosure and Use of Personal Information:

Personal information is collected and used for the purposes as described in the section: "Purpose of Collecting of Personal Information:"

We may also disclose personal information to 3rd Party service providers and/or contractors who assist us in the delivery of our products and services. An example is a client using a 3rd Party SMS delivery service to delivery SMS or Text messages to mobile phones to allow individuals to use the system as they do not have/require a company email address.

We may also be required to disclose personal information where there is a legal requirement through an authorised agency. E.g. criminal investigations.

Any individual regardless of client, consenting to use the registered and licensed software application to complete a Personal Assessment, gains upon completion, immediate access to their results, which is the outcome of using their personal information (email address, name or mobile phone no.).

Direct Marketing:

We do not disclose, sell, or trade personal information to third parties for the purpose of them marketing directly to Clients and their personnel, regardless of the client being local or overseas.

We do not perform or hire mass email or telephone marketers to solicit information from Clients' personnel.

Any disclosure of an individuals' personal information for the purpose of marketing would only be conducted after the consent of both the client and of the individual(s) had been obtained.

We may from time to time offer a newsletter or update of enhancements and new features, that will be directed to a specific manager(s). They can ask to be removed from any such list if they prefer not to receive them, by contacting us via our administration email in the Contact Us section of our website.

We may from time to time, ask selected Clients Managers or 3rd Party consultants, to comment on efficacy and benefits or concerns on the use of the licenced system to enhance or promote our product(s).

Access to Personal Information:

Des Allen Pty Ltd. is the provider of the software system that clients and 3rd party consultants may use. For clients this may also mean a 3rd Party mobile phone SMS providers, that clients may use. Regardless each

This means that other APP entities have access to individuals' personal information. Each entity however, would be required to have their own privacy policy and operational procedures that comply with the resident country privacy compliance regulations.

Personal information in the vast majority of cases is for clients' personnel (Managers & Employees) and comprises of name, company mail address and/or their mobile telephone no. and consequently in our case, individuals already know their personal information.

Information considered "Sensitive Information" by the Privacy Act 1988 is not collected or held.

From time to time a personal assessment may be required to be completed by an employee or manager (Individual) however, their personal information is always at hand and they have immediate access - at any time - so their personal information is readily at hand electronically without having to request it.

Quality/Accuracy of Personal Information:

We strive to ensure that certain personal information collected during is accurate – particularly where our software products are concerned. However other personal information e.g. employee names are so diverse, accuracy is best left to the Client from whom the information comes from. We do take measures to validate information e.g. duplications or invalid email formats. An example is validating an email address format.

The licenced software product accepts information as is entered by the client. In the event personal information is requested to be altered by DAPL we will seek permission to access said personal information, in order to correct.

However, should a client or 3rd party consultant believe that personal information being processed is incorrect in some way, then the client can request alterations on behalf of an individual, by emailing support@desallen.com so we can make reasonable efforts to assess the situation and arrange its correction.

Right to be Forgotten:

At any time should an individual request that they be, "Forgotten", they can inform their employer in accordance with compliance regulations and a request to have their personal information removed from current and backup files, can be made to DAPL, who will act upon it accordingly.

Personal Storage Limitations:

Storage of personal data for employees of an organisation will be stored for the length of time the client deems it necessary, whilst they hold a current software licence. Historical analysis and trends form part of the software product analysis and the trends are based upon employee and management responses to personal assessments.

As mentioned, individuals can have their personal information removed at any time. For the client (organisation) retention of data is based upon an annual licence fee for the software product. Licences that elapse or if DAPL is informed by the client or through a 3rd party consultancy that the licence is no longer required, then ALL data associated with the client is removed. Notification of this action is part of the License agreement.

Queries and Complaints:

We continuously endeavour to improve our products, our services and our procedures so that personal information is protected and treated in accordance with the compliance regulatory authorities. If there is a reason that we appear to have been negligent or have lapsed in some way in accordance with this policy or the OAIC Policy Principles then please make contact with us, so that a satisfactory conclusion can be reached and any identified issues resolved to the client's satisfaction.

On this basis, our approach will be:

- To listen and understand the nature of the complaint(s);
- Together, discuss and develop ways to correct the situation(s);

- Establishing a new approach and plan a direct course of action towards ensuring the issue is not repeated; and
- Follow up to ensure the issue(s) have been addressed and the situation(s) remedied.

Cross Border Disclosure:

The nature of our business may require overseas 3rd Party entities to support overseas clients in the use of our software systems. We strive at all times to ensure the compliance by all 3rd Parties, to meet the standards and regulations as stipulated in the Australian Privacy Act 1988.

On this basis contractual non-disclosure agreements are mandatory for all 3rd Party entities services associates of Des Allen Pty Ltd. and for 3rd Parties and their clients.

In addition, non-disclosure and compliance agreements are required for all 3rd Parties and Client users of our software products.

Likewise, on the basis that we wish to do business with clients or 3rd party entities residing overseas, we are in the process of ensuring compliance with the governing legal data protection regulatory authorities of those countries. e.g. EU-GDPR; UK-GDPR – UK-ICO; NZ – The Privacy Act 1993. This is currently being undertaken on a country by country basis where our products and services are required.

Regardless of country, the disclosure of personal information as outlined in this privacy policy document, would as a minimum apply.

Government Related Identifier:

We have endeavoured to ensure that the minimum amount of personal information is collected for use by our software.

Consequently, the nature of an individual's Personal Information that is collected and used, does not include any personal information that is classified as "Sensitive Information" by the Australian Privacy Act and where a government assigned 'sensitive identifier' e.g. Australian Passport No's; drivers licence; Medicare No's etc. is assigned.

There is, however, a Government assigned identifier i.e. ABN: No's. for any company(s) we conduct our business with and is required when we invoice from time to time. This is done through a separate manual process.

There is no relationship between the Governments Identifier (company ABN/ACN No.) and our software products that are used by a client, where personal information associated with any individual (employee) could be accidentally or otherwise, assigned the Government Identifier and used in error.

The Use of Cookies:

To meet the needs of our software users, cookies are used when a person logs into our website or uses the application software system and navigates around the system. Cookies help the user to stay logged in and quickly visit and revisit pages in the system.

They are used by the web browser in conjunction with the IP address which can change if the user for example uses the company desktop terminal and then later, logs in using their laptop at home. However, we do not use or disclose this electronic feature to access any of a clients' personal Information.

Compliance with other Data Regulatory Authorities:

DAPL is also in the process of ensuring our software and privacy policies adhere to and are compliant with:

- EU – GDPR
- EU – GDPR / UK ICO (Information Commissioners Office)
- NZ Privacy Policy

Last Updated: 6th January 2025