

## Privacy and Confidentiality Policy

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Centreforce takes privacy very seriously. We use the information we collect about our clients to maximise the services that we provide to them. We respect the privacy and confidentiality of the information provided by them and adhere to the Australian Privacy Principles derived from the Privacy Act 1988 (Cth).

Employees will:

- maintain individual and service information and store documentation according to this policy at all times;
- not share information about the individual or service, management information, or other staff, other than as allowed in this policy or as per legislative authority; and
- not take any customer information, or send any information to any third party or retain any information if you leave.

Clients may change their details at any time by advising us in writing via email. All information we receive is protected by our secure server. Centreforce Group's secure server software encrypts all customer information before it is sent to us. Furthermore, all customer data collected is secured against unauthorised use or access. Credit card information is not stored by us on our servers.

### Storage and Security of Information

We receive and store information on our website or in other ways from time to time. This may be basic contact information such as name, phone number, address, and mail address to enable us to send information or process product orders and we may also collect additional information at other times, including but not limited to, when clients provide feedback, change their content or email preferences, respond to a survey, or communicate with our customer support.

We may use personal information collected from clients for the purpose of providing them with direct marketing material, updates regarding our website and information in the form of a newsletter. This will only apply if they have registered or subscribed to such publications by registering their details with us. However, if clients wish to cease receiving any such information they may let us know either by email or unsubscribing at any time and their request will be actioned within 5 working days. Individual profile and company details are not used for any other purpose. Details are only supplied to a third party supplier when it is required by law, for goods or services which clients have purchased, for the fulfilment of a sales engagement with HubSpot, or to protect our copyright, trademarks and other legal rights.

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We respect the privacy of our online visitors. We may collect information on or through this website that can personally identify clients. For example, we collect personally identifiable information which they volunteer to us to respond to visitor questions and comments about us and our products and services, and to mail e-newsletters (“Personal Data”).

We will use all reasonable means to protect the confidentiality of their Personal Data while in our possession or control. We will not knowingly share any of their Personal Data with any third party other than our service providers who assist us in providing the information and/or services we are providing to clients. To the extent that we do share their personal information with a service provider, we would only do so if that party has agreed to comply with our privacy standards as described in this privacy policy. Some of our service providers may be overseas and may not be subject to Australian Privacy Laws.

Any non-personal information, communications and material clients send to this website or to us by email, or which we obtain from third parties without promises of confidentiality, may be kept, used and disclosed by us on a non-confidential basis. We are free to use and reproduce any such information freely, and for any purpose whatsoever. Specifically, we will be free to use any ideas, concepts, know-how or techniques contained in such information for any purpose, including developing, manufacturing or marketing products.

## Disclosure of Information

We may, at times, need to disclose certain information, which may include their Personal Data, to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, in the course of a legal proceeding or in response to a law enforcement agency request. Also, we may use their Personal Data to protect the rights, property or safety of Centreforce, our customers or third parties.

If there is a change of control in one of our businesses (whether by merger, sale, transfer of assets or otherwise) customer information, which may include their Personal Data, could be disclosed to a potential purchaser under a confidentiality agreement. We would only disclose their information in good faith and where required by any of the above circumstances.

## Third Parties

We do not and will not sell or deal in personal or customer information. We will never disclose their personal details to a third party except the necessary information required by providers of products or services they have purchased, for the fulfilment of a sales engagement with HubSpot, or to protect the rights, property or safety of Centreforce, our customers or third parties or if required by law. We may however use in a general sense without any reference to clients

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name, their information to create marketing statistics, identify user demands and to assist it in meeting customer needs generally. In addition, we may use the information that they provide to improve our website and services but not for any other use.

## Security

We strive to ensure the security, integrity and privacy of personal information submitted to our website, and we periodically update our security measures in light of current Technologies.

## Change in Privacy Policy

As we plan to ensure our privacy policy remains current, this policy is subject to change. We may modify this policy at any time in our sole discretion and all modifications will be effective immediately upon our posting of the modifications on this website. Please return periodically to review our privacy policy.

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