PRIVACY POLICY

1. About this Privacy Policy

1.1 In this Privacy Policy, references to **Opticomm**, "**we**", "**us**" and "**our**" are to Opticomm Pty Ltd (ABN 50 117 414 776).

1.2 Opticomm has obligations regarding the collection, use, disclosure and storage of personal information. These obligations are set out in the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth) (**Privacy Act**), and other applicable State and Territory privacy laws.

1.3 The employee records exemption set out in the Privacy Act applies to our acts and practices in relation to the handling of employee records by us in relation to current and former employee relationships. This Privacy Policy does not apply to our acts and practices in relation to employee records.

2. What is Personal Information?

2.1 The term "**personal information**" in this Privacy Policy has the meaning given to it in the Privacy Act. It is information or an opinion about an identified individual or reasonably identifiable individual, whether true or not and whether recorded in material form or not.

2.2 "**Sensitive information**" is a sub-category of personal information. It includes information about an individual's racial or ethnic origin, political opinions, membership of political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual orientation or practices, criminal record, health information, genetic or certain biometric information.

2.3 Personal information is obtained in many ways including application forms, correspondence, by telephone, by email, via www.opticomm.com.au and any other websites, owned or operated by us from time to time (**Websites**), and from third parties.

2.4 We do not generally collect sensitive information. However, if we do collect sensitive information, we will seek your consent (unless applicable laws permit us to collect such information without obtaining consent).

3. What Personal Information Do We Collect and Hold?

3.1 The types of information we collect, and how we collect it, depend on the products and services you use and how you interact with us.

3.2 To operate our business and provide our products and services, we need to collect your personal information, and on occasion, the law may require us to collect it.

3.3 We may collect the following types of personal information about you:

- your name and contact details (such as address, email address and telephone numbers);
- your profession, occupation or job title;
- details of the services that you have acquired through us or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries;
- if you are a job applicant, information that you submit to us as part of the job application process;
- if you are an employee or contractor, information relating to your engagement with us;
- information you provide to us through our Websites, customer service team, customer surveys, promotions or communications with our representatives from time to time; and
- digital information from cookies, pixels and similar technology (including third party tracking and social media) when you visit our Website, apps and digital channels. This may include information about:
    - your location (including IP address or geolocation);
    - the browsers, networks or devices you use; and
    - how you interact with our content on third party websites and platforms.

3.4 We collect health information linked to an address when a service is registered for Priority Assist, however, do not record the name of the person with the medical condition.

3.5 If you need to provide personal information about other individuals to us (e.g. about your authorised representative), we will use that personal information in accordance with this Privacy Policy and will rely on you to have informed those individuals that you are giving their personal information to Opticomm and to have advised them about this Privacy Policy.

4. How Do We Collect Your Personal Information?

4.1 We may collect information about you from you directly, through your dealings with us, and from third parties or other sources.

4.2 Examples of how we may collect personal information from you include:

- When you complete an application, form or purchase order;
- When you use our networks, platforms, products or services (including our customer service call centre and online services);
- When you report a fault and/or request support for your services;
- When you provide feedback to us;
- When you visit or fill in a form on the Websites;
- When you submit a job application to us;
- When you contact us by telephone, email, social media or post;
- When we are otherwise required or authorised by law.

4.3 We may also collect personal information from third parties. Examples include:

- Retail service providers;
- Your nominated representatives;
- Publicly available sources of information or registers;
- Our related entities;
- Law enforcement agencies and other government entities;
- Platforms and technology providers connected to your use of our Website, social media, products and services including when you use our digital channels;
- Third parties who you have referred us to or otherwise authorised (for example, referees or authorised representatives).

5. What Happens if Opticomm Can't Collect Your Personal Information?

5.1 If you do not provide us with particular personal information, we may not be able to provide you with the information, products or services you want.

5.2 You can choose to deal with us anonymously or by using a pseudonym. However, please note that if you choose to remain anonymous, this may affect your ability to access or use certain functions of the Websites or products and services.

6. Why Do We Collect, Hold, Use and Disclose Your Personal Information?

6.1 We collect personal information about you so that we can perform our business activities and functions, operate our business efficiently, and to provide the best possible quality of service to you.

6.2 We collect, hold, use and disclose your personal information for the following purposes:

- To perform our organisational functions and activities in order to operate our business efficiently;
- To identify and communicate with you;
- To enable us to connect services, arrange and attend appointments, investigate and repair faults;
- To enable us to provide you with information about network upgrades, maintenance, and matters connected with our services;
- To help us to manage services we procure from our suppliers, contractors and technicians;
- To manage and administer any account you hold with us;
- To enable you to access and use our Websites and online services;
- To process payments;
- To operate, improve and optimise our Websites and online services and yours and other users' experience;
- To send support and administrative messages, reminders, technical notices, updates, security alerts, and information to you;
- To send marketing and promotional messages to you and other information that has been requested or which may be of interest;
- To process any application submitted by you;
- To respond to any queries or complaints you have made;
- To comply with our legal obligations;
- To assist government and law enforcement agencies or regulators.

7. To Whom Do We Disclose Your Information?

7.1 We may disclose your personal information to:

- Our related entities;
- Our employees;
- Our contractors and service providers who assist us to provide products and services to you or to administer our business (including, without limitation, IT systems and network administrators, mailing houses, couriers, payment processors, data entry service providers, debt collectors, and professional service providers such as accountants, solicitors, business advisors and consultants);

- Regulators or governmental authorities or other organisations as required or authorised by law;
- Other third parties with whom we have commercial relationships;
- Your nominated representatives;
- Any other organisation as authorised by applicable law or with your consent.

8. Do We Disclose Your Personal Information to Anyone Outside Australia?

8.1 Generally, we do not send or disclose your personal information to anyone outside Australia. That said our Websites use tools such as Google Analytics which is generally understood to transmit web site traffic data to services which may be located outside of Australia (for example, the United States of America).

8.2 We may, from time to time, disclose your personal information with third parties (such as with service providers who help us provide our products and services) who are in locations outside of Australia, including Canada, countries within the European Union, India, New Zealand, Philippines and the United States of America. Unless an exception applies in the Privacy Act, if we do disclose your personal information to third parties outside of Australia, we will take reasonable steps in the circumstances to ensure that the overseas recipient adheres to the APPs.

9. How Can You Request Access and/or Correction of Your Personal Information?

9.1 You may request access to any personal information we hold about you at any time by contacting our Privacy Officer.

9.2 As part of processing a request, we may need you to provide additional information to us in writing including to verify your identity.

9.3 There may be instances where we cannot, or are permitted by applicable law to refuse to, grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others. If that happens, we will give you written reasons for any refusal.

9.4 Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We may charge you a reasonable fee to cover our administrative and other reasonable costs in providing the information to you (we will let you know at the time of the request). We will not charge for simply making the request and will not charge for making any corrections to your personal information.

9.5 If you believe that personal information we hold about you is incorrect, out-of-date, incomplete, irrelevant, misleading or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we are not satisfied that there are grounds for making such an amendment (including where we are permitted by applicable law to refuse your request), then you may request that we make a note to the record of the relevant personal information stating that you believe the personal information to be inaccurate, out-of-date, incomplete, irrelevant or misleading.

9.6 We will respond to your requests for access to, or correction of, your personal information in a reasonable timeframe.

10. What is the Process for Complaining About a Breach of Privacy?

10.1 If you have a complaint or concern regarding our handling of personal information, please contact us using the contact information below and provide us any relevant details so that we can appropriately consider it. We request that all complaints be made in writing, so that we can be sure about the details of the complaint (but note you are not obligated to do so). We will treat your complaint confidentially, investigate your complaint and aim to ensure that we contact you and your complaint is resolved within a reasonable time (and in any event within the time required by the Privacy Act, if and as applicable).

10.2 After we have completed our enquiries and consideration of the matter, we will contact you, usually in writing, to advise the outcome and invite a response to our conclusions about the complaint. If we receive a response from you, we will assess it and advise if we have changed our view.

11. Direct Marketing Materials

11.1 We may send you direct marketing communications and information about our services that we consider may be of interest to you, but we will not do so if you tell us not to. These communications may be sent by us, our related entities, our other business partners or our service providers. These communications may be in various forms, including mail, SMS and email.

11.2 If you do not want to receive direct marketing, you can unsubscribe or opt out by contacting us at the address below or by using opt-out process provided in the direct marketing communications. If we send you direct marketing by email or SMS, we will include an 'unsubscribe' link you can use to opt out of this type of marketing.

11.3 If you unsubscribe from direct marketing, we will ensure that your name is removed from our mailing list.

11.4 We generally do not provide your personal information to other organisations for the purposes of their direct marketing. Should we do so, we shall notify you and comply with our obligations under applicable law.

12. Security

12.1 Opticomm is ISO/IEC 27001:2022 certified and is compliant with Maturity Level 1 of the Essential Eight framework developed by the Australian Signals Directorate.

12.2 We endeavour to take reasonable steps to help ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure.

12.3 To help protect the privacy of data and personal information that we collect and hold, Opticomm implements various physical, technical and/or administrative safeguards including requiring employees to undertake information security training as well as comply with related internal policies, restricting access to personal information to employees who require such access to do their job, and using trusted service (including cloud storage) providers. Opticomm's services are hosted in Australia in facilities that we own or operate, or are owned and operated by our service providers.

12.4 We generally hold your personal information in electronic form. We take measures to help ensure the personal information we hold is destroyed or de-identified when it is no longer needed for the purpose(s) it was collected or when we are no longer required or permitted by law to retain it (whichever is the later).

12.5 As our Website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet.

13. Cookies, Website Analytics and Other Collection Tools

13.1 To improve your experience on Opticomm's Website, we may use 'cookies'. Cookies are an industry standard and most major web sites use them. A cookie is a small text file that your web browser may store on your device as a tool to remember your preferences. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of the Website.

13.2 Our Website may contain links to other web sites. Please be aware that those other web sites will have their own privacy practices over which Opticomm has no control and has no responsibility. When you go to other web sites from Opticomm's Website, Opticomm recommends that you read and be aware of their privacy policy. We make no representations or warranties in relation to the privacy practices of any third party

web site and we are not responsible for the privacy policies or the content of any third party web site. Third party web sites are responsible for informing you about their own privacy practices.

13.3 Opticomm's Website uses Google Analytics, a service which transmits Website traffic data to Google servers in the United States. Google Analytics generally does not identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand Website traffic and webpage usage. You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or use the opt-out service provided by Google.

13.4 When you visit our Website, a record is made of your visit, including the following information: your server address; your top level domain name; the date and time of access to the Website; pages accessed and documents downloaded (if any); the previous site visited; and the type of browser software in use. We analyse this non-identifiable Website traffic data (including through the use of third party service providers) on an aggregated and unaggregated basis to improve our services and for statistical purposes. No attempt will be made to identify users or their browsing activities except in the unlikely event of an investigation, where a law enforcement agency may exercise a warrant to inspect Opticomm’s log files.

13.5 We use Facebook Pixel, a piece of code that we put on our website to measure the effectiveness of our advertising by understanding the actions people take on our website. Facebook Pixel helps us to ensure our ads are shown to the right people. It collects data that helps Opticomm track conversions from Facebook ads, optimise ads, build targeted audience for future ads, and remarket to people who have already taken some kind of action on our website.

13.6 Opticomm's Website may also link to social media sites such as LinkedIn, X, Facebook and others. If you choose to "like" or "share" information from this Website through these services, you should review the privacy policy of that service. If you are a member of a social media site, the interfaces may allow the social media site to connect your visits to this site with other personal information.

13.7 Opticomm may, from time to time, also use other tools to collect personal information from your interactions with us (such as the visitor tracking functionalities provided by Microsoft Clarity). The types of information such tools may collect (in addition to the above) includes IP addresses, rough location of individual, URLs visited by individual and individual's device's screen size.

14. Automated decision making

14.1 We and/or our service providers may use automated systems and tools that support decision making or other business functions involving your personal information that we collect from our interactions with you, including systems and tools that:

- help our staff/service providers to efficiently understand your interactions with us (including any requests, queries and complaints you have made) and otherwise communicate and interact with you (including by providing our staff/service providers with interaction summarisation and wrap-up, suggested knowledge and next best action for agents, ticket classification and routing on intake, and drafting assistance for communications with you);
- verify your identity (including by providing IVR and virtual agents that verify you);
- automate the tracking and assessment of our interactions with you (including by way of transcription recording, compliance and complaint risk indicators) for quality and assurance purposes, to support the coaching of staff/service providers and reduce complaints, and to help deliver better outcomes for you.

14.2 Any automated decision making involving your personal information remains subject to human oversight and appropriate human review.

14.3 We currently do not rely solely on automated decision making to make a decision that has a significant impact on you. You may ask us for further information about how those systems use your personal information or ask us to review a decision, by contacting us using the details below.

15. Contact Us – Privacy Policy Enquiries

15.1 If you have any questions about this Privacy Policy, any concerns or a complaint regarding the handling of your personal information, please contact our Privacy Officer using the details set out below. We will treat your requests or complaints confidentially.

15.2 We will consider your complaint and determine whether it requires further investigation. We will notify you of the outcome of this process.

15.3 If you remain unsatisfied with the way in which we have handled your privacy complaint or concern, you may approach an independent advisor or contact the Office of the Australian Information Commissioner (OAIC). See the OAIC website for more information about how to make a complaint.

15.4 Please contact our Privacy Officer at:

Privacy Officer Post: Suite 1601, 323 Castlereagh Street, Haymarket NSW 2000

Email: privacy@opticomm.com.au

16. Policy Updates

16.1 We will review and update this Privacy Policy from time to time. Any changes to our policy will be published on https://www.opticomm.com.au/legal/privacy-policy/.

16.2 You may obtain a copy of our current Privacy Policy from our Website or by contacting us using the contact details above.

16.3 This Privacy Policy was last updated: 6 November 2026

(Version: November 2026)