

Comwire IT Privacy Policy

1. About this policy

This policy explains how Comwire IT collects, uses, shares and protects personal information. It applies to Comwire IT Pty Ltd (ACN 143 994 441) and Comwire Voice Pty Ltd (ACN 612 450 076). In this policy, “Comwire IT”, “we”, “us” and “our” mean both companies.

We’re bound by the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (APPs).

Who this policy covers

- Our clients and their contacts
- People who enquire about our services or visit our website
- People who attend our events or receive our marketing
- Our suppliers and their contacts
- Job applicants

What this policy doesn’t cover

- **Our employees’ records.** Information about current and former employees is handled under our internal privacy policy.
- **Information we manage for our clients.** When we support a client’s IT systems, the client decides how the information in those systems is handled. Section 5 explains our role.

2. What personal information we collect

We only collect personal information we need to provide our services and run our business. What we collect depends on how you deal with us.

Who you are	What we may collect
Client contacts and users we support	Name, job title, work email, phone and mobile numbers, work location, and details in support requests, including screenshots and attachments
Clients setting up payment	Bank account or credit card details for direct debit
Enquirers and website visitors	Name, email, phone, company name, your IT needs, how you heard about us, and website usage data
Event attendees and marketing recipients	Name, contact details, company, and your marketing preferences
Suppliers	Contact names and business contact details
Job applicants	See section 8

Payment details. We only keep bank and card details for as long as we need them to set up and process payments.

Calls. We record inbound and outbound calls for training and quality purposes. We’ll tell you at the start of each call that it’s being recorded.

Sensitive information. We only collect sensitive information where we need it and with consent, for example background checks for job applicants (section 8).

3. How we collect it

We usually collect personal information directly from you, including when you:

- contact us by phone, email or our website form;
- log a support request or use our Customer Portal;
- sign an agreement with us or set up payment;
- attend one of our events; or
- apply for a job with us.

Sometimes we receive it from others, such as your employer when they're our client, a recruiter, or a background check provider. Our website also collects some information automatically (section 7).

You can make general enquiries without giving your name, or by using a different name. We'll need your details to provide services, respond to support requests or consider a job application.

4. Why we collect, use and disclose it

We use personal information to:

- provide, manage and support our services;
- respond to enquiries and prepare quotes and proposals;
- register hardware warranties and software licences for our clients;
- bill clients, process payments and recover unpaid amounts;
- send marketing, if you haven't opted out (section 7);
- assess job applications (section 8);
- improve our services and website; and
- meet our legal obligations.

We only use or disclose your information for another purpose if you'd reasonably expect it, you've agreed, or the law requires or allows it.

5. Information we manage on behalf of our clients

As a managed service provider, we can access information stored in our clients' systems, such as their email and files. Some of that information may be sensitive.

When we access client systems:

- we do so only to deliver the services our client has asked for, such as resolving a support request;
- our client remains responsible for that information and how it's handled;
- our technical staff only access what they need for the task; and
- we handle that information under our agreement with the client.

Remote support sessions only happen with the permission of the person or client we're supporting.

If you want to know how your information is handled in a system we support, please contact the organisation that holds it. They can contact us if they need our help.

6. Who we share information with

We don't sell, rent or trade personal information. We only share it when we need to, with:

- **Our related companies**, including Comwire IT Pty Ltd and Comwire Voice Pty Ltd;

- **Hardware and software vendors**, to register warranties and licences and resolve technical issues;
- **Service providers** who help us run our business, such as our service management, accounting, payment, marketing and recruitment platforms;
- **Contractors** who work for us in Australia and overseas;
- **Recruiters and background check providers**, for job applications (section 8);
- **Professional advisers and auditors**, such as our lawyers and accountants;
- **Banks, financiers and debt collection agencies**, where needed to process payments or recover unpaid amounts;
- **A buyer or potential buyer**, if we sell or propose to sell all or part of our business;
- **Government agencies and regulators**, when the law requires or allows it; and

We require our contractors to keep personal information confidential and protect it under their agreements with us.

Overseas disclosure

Some of our contractors and service providers are located outside Australia, or store or process information overseas. These countries currently include the Philippines and the United States.

We take reasonable steps to make sure overseas recipients handle personal information in line with the APPs.

7. Website, cookies and marketing

Website analytics and advertising. Our website uses cookies and similar analytics and advertising tools. They help us understand how people use our site and show our ads to people who may be interested in our services. These tools may collect information such as your device, browser, pages visited and approximate location. You can block or delete cookies in your browser settings, though some parts of the site may not work as well.

Marketing. We may send you newsletters, event invitations and information about our services. Every marketing email includes a way to unsubscribe. You can also opt out at any time by contacting us (section 13).

Testimonials and case studies. We only publish client names, quotes, photos or videos with the client's consent.

8. Job applicants

When you apply for a role with us, directly or through a recruiter or job site, we collect:

- your resume, cover letter and contact details;
- your work rights and salary expectations;
- referee details and reference feedback;
- background check results, such as police checks, with your consent; and
- diversity information, only if you choose to give it.

We use this information to assess your application and check your suitability and right to work. Only the people involved in recruiting for the role can see your application. For some roles outside Australia, we share your details with an employer of record provider.

If you're not successful, we'll ask before keeping your details for future roles. If you don't agree, we'll delete them within 24 months.

If you're hired, your information becomes part of your employee record and is handled under our internal privacy policy.

9. Automated decisions and AI

We don't use computer programs to make decisions that significantly affect individuals. If that changes, we'll update this policy before we start.

Our staff may use approved AI tools to help with their work, such as drafting responses or summarising support requests. We don't use client or customer personal information to train AI models.

10. How we protect and keep information

We take reasonable steps to protect personal information from misuse, loss and unauthorised access. We use technical, physical and administrative safeguards, and limit access to people who need it for their work.

We keep personal information only as long as we need it for our services or as the law requires. When we no longer need it, we securely delete or de-identify it.

Data breaches. If a data breach is likely to cause serious harm, we'll notify the people affected and the Office of the Australian Information Commissioner (OAIC), as the law requires. If a breach involves information we manage for a client, we'll tell that client promptly so they can meet their own obligations.

11. Accessing and correcting your information

You can ask to see the personal information we hold about you, or ask us to correct it. Contact our Privacy Officer (section 13).

We'll respond within 30 days. We won't charge you to make a request, but we may charge a reasonable fee to cover the cost of giving you access. We'll tell you about any fee first.

In some cases the law allows us to refuse access or correction. For example, we may refuse access if it would unreasonably affect someone else's privacy, the request is frivolous or vexatious, the information relates to existing or expected legal proceedings, or the law requires or authorises us to refuse. If we refuse, we'll explain why in writing and tell you how to complain.

12. Complaints

If you think we've mishandled your personal information, please contact our Privacy Officer in writing (section 13). Tell us what happened and how you'd like it resolved.

We'll acknowledge your complaint, look into it under our complaints handling process, and give you a written response within 30 days.

If you're not satisfied with our response, you can complain to the OAIC:

- Website: www.oaic.gov.au
- Phone: 1300 363 992

13. Contact us and changes to this policy

For privacy questions, requests or complaints, contact:

Privacy Officer (People & Culture Leader)

Comwire IT

Email: info@comwireit.com.au

Phone: 1300 266 947

Post: 15B Richard Street, Hindmarsh SA 5007

We review this policy at least once a year and whenever our practices change. We may update it at any time, and the current version is always available on our website.

Document control

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