

# Central Monitoring Services Privacy Policy

## 1. Introduction

References to “CMS” in this Privacy Policy includes Central Monitoring Services Pty Ltd 64 003 630 877 and related entities (as defined pursuant to the *Corporations Act 2001* (Cth)). CMS provides alarm monitoring and related services.

CMS (also referred to as “we”, “our” and “us”) is committed to protecting your privacy and personal information when you use our services or our website.

The purpose of this Privacy Policy is to explain how and why we collect, hold, use and disclose your personal information to assist us in carrying on our business. By providing us with your personal information, you consent to us holding, using and disclosing it as set out in this Privacy Policy. CMS will comply with obligations under the *Privacy Act 1988* (Cth) (**Privacy Act**) (including the Australian Privacy Principles (**APPs**) and the *Privacy (Credit Reporting) Code 2014* (**CR Code**)).

We may update this Privacy Policy from time to time and changes will take effect when published on our website. You should periodically view our website to stay up to date with the current terms of this Privacy Policy.

This version of the Privacy Policy was last updated on 27th August 2024.

## 2. Collection and Use of Personal Information

### 2.1 What is “Personal Information”

The Privacy Act currently defines "personal information" as meaning information or an opinion about an identified individual or an individual who is reasonably identifiable:

- (a) whether the information or opinion is true or not; and
- (b) whether the information or opinion is recorded in a material form or not.

If information does not disclose your identity or enable your identity to be ascertained, it will in most cases not be classified as "personal information" and will not be subject to this privacy policy.

### 2.2 Information We Collect

We collect information that personally identifies you, which may include your full name, job status and title, company name, address, phone and fax numbers, email address, mobile number, date of birth, gender, address details, payment details, proof of identity (e.g. driver licence or passport

number), interest areas and other preferences. We may collect additional personal information from time to time.

We may also collect credit-related personal information to assess your credit worthiness including credit liability information, repayment history information, court proceedings, insolvency actions and credit worthiness.

We may need to collect sensitive information about employees or prospective employees including ethnicity, criminal record, tax file number, disabilities and employment history.

We do not otherwise generally collect sensitive information about you, unless it is voluntarily provided to CMS in the course of us carrying out our services.

You don't have to give us the information requested. However, if you do not provide us with some or all of the personal information requested, we may not be able to provide you with services or satisfy your request, to the requested standard or at all, and you may also miss out on receiving valuable information about CMS or our services.

### **2.3 Consent to Collection and Use**

By using the CMS website and services, providing information to us via any medium (including engaging with us through any social media channel), applying for a job with us or entering into an arrangement or other agreement with us, you are consenting to the collection and use of your personal information in accordance with this Privacy Policy.

You consent to us collecting sensitive information which you provide to us voluntarily.

### **2.4 Why We May Collect, Hold, Use and Disclose Personal Information**

CMS may collect, hold use and disclose personal information about you to provide and improve the quality of the CMS services. Our collection, holding, use and disclosure of your personal information will depend on our relationship with you, the circumstances of collection and the type of products and service you request from us, but may include the following:

- (a) to provide a service that you have requested, for example, if you have requested services via the CMS website;
- (b) to inform and conduct marketing activities including to promote any other service that we provide, unless you tell us not to;
- (c) because you work for us, or apply to us for a job, work experience or appointment as a contractor; and
- (d) to maintain our records and comply with our legal obligations.

## **2.5 How We Collect Personal Information**

The main ways we collect personal information are:

(a) **Access to Website and Social Networking Services:**

If you access our website or engage with us via social networking services, including by the use of cookies, which may track what you view on our website and also other websites that you visit.

(b) **Mailing Lists:**

If you subscribe to any of our mailing lists.

(c) **Employment and Other Relationships:**

If you apply for a job with us or become an employee.

(d) **Supply or Services:**

If you are a supplier or service provider to CMS or if CMS is a supplier or service provider to you, in connection with the supply of products and services.

(e) **Other Contact and Requests:**

If you request us to provide you with CMS services or for information regarding CMS services. This may include online, email and telephone enquiries.

(f) **Third parties:**

Third parties we may engage to assist us in improved provision of services, marketing and advertising. These third parties may use cookies and other technologies to obtain information about your preferences when you access online platforms or websites other than our website. Your preferences collected in this manner may be disclosed to us. These third parties may include:

- (i) credit reporting bodies, law enforcement agencies and government agencies to verify identity and/or assess credit worthiness;
- (ii) service providers that may provide market leads or marketing services to us and online platforms such as Google and Facebook;
- (iv) your employer or other individuals to confirm your identity or other details about you in any application that you may submit to us including in respect of a job application intermediaries such as recruitment agents or personnel providers.

## **3. Disclosure of personal information**

### **3.1 Disclosure of personal information to third parties**

We may disclose your personal information to third parties as a part of providing the CMS services, including:

- (a) to credit reporting bodies and providers;
- (b) to any contractors or third parties we engage to assist with the provision of the CMS services;
- (c) to marketing, advertising and promotions services providers and event organisers in connection with our marketing, advertising or events;
- (d) to service providers of other administrative or operational services to CMS, such as market research companies, IT service providers, utility companies, payment processors and debt collectors;
- (e) to law enforcement or government agencies or other third parties, if permitted or required by law; and/or
- (f) otherwise with your consent.

In many cases, CMS imposes contractual restrictions equivalent to those imposed on CMS under the Privacy Act in respect of collection and use of personal information by those third parties. In some cases, CMS' ability to impose contractual restrictions is limited. In those circumstances, CMS will carefully consider the risks to the protection of personal information when entering into arrangements with third parties.

Under no circumstances will CMS sell or receive payment for licensing or disclosing your personal information.

In the event of a data breach likely to cause serious harm involving your personal information, we will notify you in accordance with our Notifiable Data Breaches scheme obligations under Part IIIC of the Privacy Act.

### **3.2 Cross-border disclosure of personal information**

Some of CMS' third party contractors, suppliers and distributors may be located overseas or perform services overseas and as a result your personal information may be disclosed to a third party in a foreign country.

Under the Privacy Act, we must take reasonable steps, before personal information is disclosed to an overseas recipient, to ensure that the overseas recipient does not breach Australian privacy laws in relation to that information (the **Obligation**).

The Obligation does not apply if you consent to disclosure of your personal information to an overseas recipient.

By supplying personal information to us you consent to the disclosure of your personal information to an overseas recipient and agree that the Obligation does not apply.

#### **4. Accessing your personal information**

You have the right to request access to personal information that is held by CMS about you.

You also have the right to request the correction of any of your personal information that CMS holds. We will take reasonable steps to make appropriate corrections to personal information so that it is accurate, complete and up-to-date.

To seek access to, or correction of, your personal information please contact CMS as follows:

**By email:**

monitoring@centralmonitoring.com.au

**By phone:**

+61 2 9809 9244

**By mail:**

Attention: Privacy Officer

P O Box 953,

Kings Langley NSW 2147.

CMS also welcomes any comments on its Privacy Policy to assist with the evaluation of its effectiveness. Any comments will be handled confidentially by the CMS Privacy Officer.

#### **5. Use of your personal information to contact you**

We will never knowingly send you unsolicited commercial electronic messages. More information on the *Spam Act 2003* (Cth) is available from the regulator's website: [www.acma.gov.au/spam](http://www.acma.gov.au/spam)

We may use information that we know about your likes and interests to tell you about CMS products and services. We may know about your likes and interests because you have provided that information.

#### **6. Opting out**

If you decide that you do not want to be contacted by CMS please contact the Privacy Officer (details at clause 4 above). You may also opt out of receiving communications by following the unsubscribe function on any CMS communications.

We will use reasonable endeavours to remove your name from the mailing lists within a reasonable period of receiving your request.

## **7. Storage and protection of your personal information**

CMS stores personal information both electronically on servers hosted by our service providers and may store some personal information in hard copy at the CMS secured offices within locked filing cabinets. CMS has implemented appropriate physical, electronic and managerial security procedures in order to protect personal information from loss, misuse, alteration or destruction. CMS regularly reviews security and encryption technologies and will strive to protect information to the fullest extent possible.

Due to the nature of the internet, CMS cannot give any warranties as to the security of any personal information transmitted by you to CMS over the internet, or that personal information will not be accessed by unauthorised persons.

We encourage you to be vigilant about the protection of your own personal information when using any digital services.

## **8. Privacy and Change of Control**

In the event CMS goes through a business transition, such as a merger, being acquired by another company, or selling a portion of its assets, users' personal information will, in most instances, be part of the assets transferred.

## **9. Linked Sites**

Our website may contain links to other sites. We are not responsible for the privacy practices or the content of such web sites. We encourage you to read the privacy statements of any linked sites as their privacy policy may differ from ours.

## **10. Personal Information About Other People**

If you give us personal information about any other person in relation to or in connection with the provision of our services:

- (a) we are entitled to assume that you have sought their consent to the disclosure of such personal information to us;
- (b) we will collect, hold, use and disclose their personal information in accordance with this Privacy Policy.

## **11. Complaints**

If you wish to make a complaint about CMS handling of your personal information, you should first make a complaint in writing to the CMS Privacy Officer. CMS will handle your complaint seriously and confidentially and will provide you with a response in a reasonable time period (usually 30 days). If CMS is unable to resolve your complaint, or you are not satisfied with the response, you may seek to have the matter resolved through mediation.

## **12. National Privacy Commissioner**

If you are not satisfied with the way in which we handle your enquiry or complaint, or you wish to make a complaint about any perceived breach by CMS of the APPs you can contact the Office of the relevant Privacy Commissioner on:

Tel 1300 363 992 or email: [privacy@privacy.gov.au](mailto:privacy@privacy.gov.au).