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This **Privacy Policy** has been published to provide a clear and concise outline of how and when personal information is collected, disclosed, used, stored and otherwise handled by UComms. The Policy relates to personal information collected by any means and by any technology.

UComms treats the handling of your personal information very seriously. To that end, UComms has systems and procedures in place to protect your privacy in relation to the handling of your personal information.

UComms abides by the Australian Privacy Principles, which provide a scheme in relation to the collection, disclosure, use and storage of personal information. UComms's objective is to handle information responsibly and provide you with some control over the way information about you is handled.

1. Collection of Personal Information

Personal information is information or opinion from which an individual's identity may be ascertained. The nature of personal information collected by UComms generally comprises an individual's name and contact details (including address, phone, fax and email) and opinions about products, services or staff. If possible and reasonably practical you will have the option of not identifying yourself or using a pseudonym in providing such information. However, if you do not identify yourself, UComms may not be able to give you're the information and services you would otherwise receive. Such personal information is collected for the purposes of arranging, conducting and promoting UComms's business activities.

UComms does not collect personal information unless it is reasonably necessary for UComms to perform one or more of its functions and business activities. On occasion, some of this personal information may be sensitive and UComms will only collect it with your consent or when required to by law.

UComms will destroy personal information when it is no longer required for such functions and business activities.

UComms will generally collect personal information from you directly. For example, UComms may collect personal information via telephone, email or letter, or when you attend a function or event, provide a resume or enter an agreement.

2. Use & Disclosure of Personal Information

Personal information provided to UComms may be shared with related companies within UComms, where it will be kept strictly confidential and will only be disclosed on a need to know basis.

UComms will use and disclose your personal information for the purpose for which the personal information was initially collected.

UComms may also use that personal information for a purpose related to the initial purpose of collection if that other purpose would be within your reasonable expectations. Related purposes might include internal auditing and administration, adding your name to a contact list, guest list or invitation list or helping us to identify production and broadcast business activities or investment opportunities which may be of benefit or interest to you.

UComms will not use or disclose your personal information for any other purposes without first obtaining your express or implied consent. UComms may however be required to disclose your personal information without your consent if the disclosure is:

- required or authorised by law;
- required in order to investigate an unlawful activity;
- required by an enforcement body for investigative activities; or
- necessary to prevent a serious and imminent threat to a person's life, health or safety, or to public health or safety.

Generally, UComms will retain your personal information within Australia and not use or disclose it overseas. However, on some occasions the information may need to be transferred overseas in order to perform one of UComms's functions or activities. In these circumstances, UComms will either obtain your express or implied consent or will take such steps as a reasonable to ensure that your personal information will receive protection similar to that which it would have if the information were in Australia.

Like most business organisations, UComms relies on third party suppliers who are contracted to conduct specialised activities such as insurance broking, supply of equipment, business services, security services and travel and hospitality services. While personal information may be provided to these suppliers in order to enable them to perform the agreed tasks, UComms will make every effort to ensure that the supplier handles the personal information in accordance with the Australian Privacy Principles and confidentiality principles. UComms will require all such suppliers to provide privacy undertakings and where necessary enter confidentiality agreements.

UComms may also need to provide your personal information to third parties where:

- UComms are (in limited circumstances) allowed or required to by law or where they have a public duty to do so. For example, a Court, a regulator (such as the Australian Securities and Investments Commission (**ASIC**) or the Australian Tax Office (**ATO**)) or the police can compel the disclosure of personal information; or
- You have expressly consented to your personal information being supplied to others. Usually such consent will be required in writing however in special

circumstances You may be able to provide consent verbally; or

- It can be reasonably inferred from the circumstances that you consent to your personal information being disclosed. For example, your consent will be implied for UComms to use and disclose your information to inform you of products and services that UComms believes may interest you. However your implied consent may be withdrawn at any time.

We may sometimes have to transfer your personal information overseas, including but not limited to recipients located in the United Kingdom. We will only do so in accordance with the Australia Privacy Principles and Australian privacy law in general.

3. Direct marketing

From time to time UComms may use your personal information to identify business activities or investment opportunities which may be of interest to you.

If you do not wish to receive direct marketing information, please let UComms know. UComms will take immediate steps to ensure that you do not receive any direct marketing information in future.

4. Personal Information Quality

UComms's objective is to ensure that all personal information collected by us is accurate, complete and up-to-date. To assist UComms in achieving its objective, please contact us if any of your details change. Further, if you believe that the information UComms holds is not accurate, complete or up-to-date, please contact us in order to have the information corrected.

5. Personal Information Security

UComms is committed to keeping your personal information secure, and we will take all reasonable precautions to protect your personal information from unauthorised access, loss, misuse or alteration.

Your personal information may be stored in hard copy documents, or electronically on UComms's software or systems.

UComms maintains up-to-date techniques and processes which meet current industry standards to protect your personal information both through physical security over its paper and electronic data stores, such as locks and security systems, and computer and network security systems with firewalls, encryption technology and passwords to control and restrict access to authorise staff for approved purposes.

Where information is particularly sensitive, the information is overwritten and then manually deleted.

6. Access to Personal Information

You may request access to the personal information UComms holds about you.

The procedure for gaining access is as follows:

- All requests for access to your personal information must be made in writing and addressed to the Privacy Officer.
- You must provide as much detail as possible regarding the business entity, department or person to whom you believe your personal information has been provided, and when. This will allow UComms to process your request faster.
- UComms will acknowledge your request within 14 days, and access will usually be granted within 30 days or otherwise within a reasonable period after the request is made. UComms will inform you if this timeframe is not achievable.
- You will be asked to verify your identity.
- A fee may apply to such access in the event that a request for access is onerous or time consuming. Such a fee will cover staff costs involved in locating and collating information, and reproduction costs.
- Depending on the circumstances, UComms will make all reasonable attempts to give access to the information in the manner you requested. If the manner requested is not reasonable and/or practicable you may be forwarded the information by another means reasonable in the circumstances, for example by mail or email, or you may be required to personally inspect your records at the appropriate place.
- You will be given the opportunity to correct any personal information which is no longer accurate.

In some circumstances, UComms may not be in a position to provide access. Such circumstances include where:

- access would create a serious threat to safety;
- providing access will have an unreasonable impact upon the privacy of other individuals;
- denying access is required or authorised by law;
- the request is frivolous or vexatious;
- legal proceedings are underway or otherwise anticipated;
- negotiations may be prejudiced by such access; or
- access would reveal a commercially sensitive decision making process.

If UComms denies access to your personal information, it will provide you with reasons in writing.

7. Complaints

If you believe that your privacy has been infringed you are entitled to complain. All complaints should initially be in writing and directed to the Privacy Officer on:

Mail: Level 1, 524 La Trobe Street, Melbourne VIC 3000

UComms will respond to your complaint as soon as possible, within 14 working days, to let you know who is responsible for managing your query. UComms will try to resolve the

complaint within 30 working days. When this is not possible UComms will contact you to provide an estimate of how long it will take to handle the complaint.

While UComms aims to resolve your complaints at your first point of contact if you are still unhappy the Office of the Australian Information Commissioner can be contacted through the privacy hotline.

8. Charter of Independence

The shareholders publicly declare a commitment to the independence of the company's subsidiary's polling activities.

The shareholders acknowledge that polling, campaigning and communication activities must be carried out fairly and regardless of any commercial, political or personal interests, including those of the shareholders, board members, any registered organisation or political party.

Full managerial control of the company's subsidiary's polling activities, within a negotiated, fixed budget, be vested with the key management of the company's subsidiaries and that the key management of the subsidiary alone shall determine the manner in which any polling, campaigning and communication activities are to be conducted and the content of any published material arising from the conduct of any polling, campaigning and communication activities.

The key management of the subsidiary alone shall make any decisions regarding the engagement, deployment or termination of any employees or contractors.

Staff conducting polling, campaigning and communication activities shall not sit on the board of the company or any subsidiaries and shall not be directly responsible to the board but to the key management of the subsidiary.

Staff conducting polling, campaigning and communication activities must at all times carry out their duties in a way that preserves the independence and integrity of the polling, campaigning and communication activities. Information barriers are to be put in place to effect this.

9. Changes To This Policy

UComms may change this Policy from time to time for any reason and will update the Policy accordingly.