
PRIVACY POLICY

This Privacy Policy describes how SAT Pty Ltd generally collects and uses your information. We will update this policy if we change the way we use personal information. This policy does not apply to SAT Pty Ltd employee or contractor records. The Privacy Policy applies to SAT (Stacey and Taylor) Pty Ltd. In this document, referred to as "SAT Pty Ltd", "we", "our" etc.

What information does SAT Pty Ltd collect about me?

The information we collect depends on our relationship with you, and includes some or all of the following:

- General information including name, title, gender, employer, role and title
- Contact details, such phone and fax numbers, email addresses, social media identities
- Payment details such as debit or credit card numbers, expiry and CV
- Your use of our products and services, including the locations and sites for which licensing is requested
- Our interactions with you, including any feedback, complaints, compliments, responses to surveys, records of correspondence, interactions with us and our staff (including in person, online, by telephone, email and social media). Your interests, such as products you have purchased from us and their use cases.
- If you use our website we may collect some or all of the following information: the type of internet browser you use, your device operating system, your geolocation, your IP address, your mobile phone number or ID, and details of how you use our website and any third party sites you have accessed from our site.

Some personal information, e.g. name, payment information, contact details, location, are required to use our products and services, and if you choose not to supply this information when requested, we may be unable to provide you with the products and services in full.

Sensitive Personal Information

Under privacy laws, certain categories of personal information are considered particularly sensitive and therefore require additional protection. Categories regarded as sensitive include information about health, racial or ethnic origin, political opinions, religious beliefs, trade union membership and sexual orientation. Sensitive information may also include genetic and biometric data. Information concerning criminal convictions and offences is also viewed as sensitive, for example, under European data protection law.

We may collect and handle some sensitive personal information, for example, when you request special medical or access assistance, or if you tell us you have specific dietary requirements relating to your religious beliefs.

We will ask you for your consent to handle this type of personal information, to the extent required under applicable laws, for example under the Australian Privacy Act or the European General Data Protection Regulation.

How does SAT Pty Ltd collect information about me?

We primarily collect information directly from you. This includes interactions you have with us using our website, social media, email and phone when you use our products and services or participate in our promotions.

There may be occasions when we collect information about you from someone else, such as:

- Our service providers.
- Third parties that provide us with marketing leads.
- The government, law enforcement and regulatory services
- Providers of third-party websites, apps, and social media platforms

If you provide us with information about other individuals, you are responsible for advising those individuals that you have divulged their information, and that they can find a copy of our Privacy Policy on the website www.satpty.com

How does SAT Pty Ltd use my personal information?

We may use your information for the following purposes:

- To provide and administer our products and services: to contact you about your enquiries and service requests, verify your identity, make arrangements with third parties (e.g. ACMA, etc.), to process payments, for quality assurance and staff training purposes, and for managing our suppliers.
- To provide customer support, such as handling queries, compliments or complaints.
- To ensure that the content of our website is presented in a manner effective for you and the device you are using, which may include passing your data to business partners, suppliers and service providers
- To comply with our legal requirements and for safety purposes, including ensuring the safety of all individuals, including investigation of safety or security events. We may process your personal information to comply with security, safety, or other legislative requirements as applicable, which may include disclosing your personal information to third parties, regulators or law enforcement agencies in connection with enquiries, proceedings or investigations.
- For marketing purposes: to provide you with information regarding updates and offers (if you have elected to receive these), to operate our competitions, promotions and events, and to distribute newsletters or other communications. We may use your information for marketing SAT Pty Ltd and our selected business partners' products and services by post, email, SMS, phone, etc. Where required by law we will ask your consent at the time we collect your data to conduct these marketing activities. We will provide an option to unsubscribe or opt-out of further communication, on any electronic marketing communication sent to you.
- To conduct market, consumer and other research. We use the information to improve our products, services, marketing activities, and to generate insights to help us improve our marketing and website, and tailor our marketing to be relevant to you.

We may combine the information we hold about you.

When may SAT Pty Ltd disclose my personal information?

We may disclose your personal information to third parties in connection with:

- Services we provide to you
- Our legal obligations, including safety or other investigations that require disclosure of information to the government, law enforcement and regulatory authorities and their service providers.

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- Responding to complaints or compliments.
 - Safety and security purposes.

Third parties we may disclose your information to include:

- Third parties providing goods or services on your itinerary or booking
- Various law enforcement agencies, regulatory authorities, and government agencies around the world, and their services providers, when compelled to do so by law.
- Other third parties, as mentioned in the section “How does SAT Pty Ltd use my personal information?”

For example, SAT Pty Ltd may use service providers for the following activities, who may handle your information on our behalf:

- billing and payment processing services (including the detection of fraudulent or suspicious bookings)
- customer service
- market research and analysis services
- marketing, printing, and distribution (mail and email) services
- information technology providers, including for data storage, communication networks, software and system development, software maintenance and support, incident investigation and resolution, and information processing analysis and reporting.

We may disclose your personal information to comply with our legal obligations, respond to complaints and claims, and investigate and protect ourselves and third parties against any activity that we reasonably suspect to be fraudulent. We may also disclose your personal information to law enforcement agencies, regulatory authorities and governments around the world and their service providers in connection with their investigations, screening or other functions.

We may transfer your information within SAT Pty Ltd and to other related bodies corporate who comply with this privacy policy.

What are cookies and how does SAT Pty Ltd use them?

Cookies are small pieces of data stored in the web browser of your computer or mobile device, that are placed there by websites you visit and by certain emails that you open. They are widely used to make websites function correctly, and to provide business with marketing information. SAT Pty Ltd’s website and associated websites may store cookies on your web browser to:

- Improve your online experience
- Process payments
- Analyse services usage and trends
- Track your browsing history and usage of our website
- Administer our services
- Improve the service’s functionality
- Understand our customers better
- Market our products and services

The information we collect can include information about how you use our website, the device and web browser you are using to access our site, and where you are in the world.

All websites that operate across certain parts of the European Union are required to obtain consent to using or storing cookies (or similar technologies) on your computers or mobile devices. This policy provides you with clear and relevant information about the cookies we use and the purposes for using those cookies.

When you first access the Services and if we introduce any new cookies, we may capture your consent to the use of certain cookies set out in this notice. If you reject cookies, we will not set any

cookies on your device, except the “strictly necessary” cookies detailed below, including a cookie to remember that you do not want any cookies set when you revisit the Services. You have the ability to manage your cookies and similar tracking technologies preference. For more information on how to administer your preference, please see “How to Manage Your Cookies” section below.

What cookies does SAT Pty Ltd use and why?

Our website uses different types of cookies. These include:

- First party cookies – these are placed on your device by our website when you visit it.
- Third party cookies – set by a domain other than SAT Pty Ltd’s when you visit our site (e.g. Google)
- Session cookies – These exist only during one browsing session, and disappear when you close your browser, restart, or turn off your device.
- Persistent cookies – these remain on your device for the period of time specified in the cookie and are activated each time you visit the website that created that cookie. They may remain after you have closed the browser, restarted or turned off the device.

We partner with third-parties to manage our marketing, advertising, and other promotional activities. Our third-party partners may use cookies and other tracking technologies in order to market products or services, manage promotional campaigns, monitor which ads have been served to your browser, which web pages you were viewing when such ads were delivered, and provide you advertising based upon your browsing activities and interests. If you would like to learn more about this practice and your choices please visit the Network Advertising Initiative <https://www.networkadvertising.org/understanding-online-advertising>. For information on how to opt-out, refer to <http://optout.networkadvertising.org/?c=1#!/>.

We use cookies on our website for the following purposes:

- Technical – to enable the efficient operation of our website, e.g. to balance traffic for a reliable service, limit traffic to certain parts of the website to maintain performance levels, store your acceptance of our privacy policy and website terms and conditions, without which access is not granted to our website.
- Ease of use – cookies are used to enhance your experience and personalise content to you receive information relevant to you and remember who you are if you return to our site. Cookies may also be used for A/B testing, which is a method of testing different designs before making them permanent for all users.
- Tracking – Cookies are used to gather statistics on how people use our website, such as identifying the most popular pages, gathering feedback through surveys, and tracking how people navigate our website.
- Examples of this include allowing our site to serve different versions of a page for marketing purposes, allowing third parties to display appropriate advertising and track its effectiveness, and to understand our customer base and online behaviour. This may include sharing and retrieving cookies with third parties from time to time.

How do I manage cookies?

You can control the use of cookies by altering the settings on your internet browser. If you choose not to accept cookies, some areas of our website may not be accessible or function correctly. If you reject or delete cookies that are not strictly necessary for the provision of the Services, some features of our Services may no longer function for you. Each browser provides different mechanisms for managing cookies. SAT Pty Ltd recommends that you refer to your browser's help menu to determine the best way to manage cookies or refer to <https://www.aboutcookies.org>

Our website may embed content and features from third-party websites. We do not control these third-party websites and associated cookies. We encourage you to read the privacy notices of these sites to understand their privacy practices and your options. SAT Pty Ltd uses Facebook Pixel. This pixel collects information about the usage of our website (e.g. products you have looked at) and transmits this information to the social network Facebook, Inc. Facebook uses this information for advertising and profiling purposes. The Facebook Pixel allows us to target you with personalised advertisements in the Facebook network. If you want to stop this tool from collecting data, you can opt-out through Facebook: <https://www.facebook.com/help/568137493302217>

Please note that we may use so-called opt-out cookies in order to remember your opt-out selection. This cookie relates to a specific device or browser and is thus valid only for the device or browser used at the time of your selection. If you use several devices or browsers, you must opt-out on every device and in every browser used.

We periodically update our cookie policy to account for changed legal and operational circumstances, to describe new cookies and tracking technologies, and how those changes affect our use of your information. We encourage you to review this cookie and privacy policy each time you use the site. If we are going to use information in a manner that is materially different from that stated at the time of collection or make any material changes in our privacy practices, we will notify you. We will post those changes through a prominent notice on our website. If you do not agree to the changes made to our policies, we recommend that you stop using our services or disable your cookies.

How does SAT Pty Ltd hold information and keep it secure?

SAT Pty Ltd holds personal information in a combination of hard copy and electronic files. We use third-party information system providers who may store or have access to your personal information. We use reasonable and appropriate physical, technical and administrative safeguards to protect information from unauthorised use, loss, misuse or alteration. We make reasonable efforts to protect personal information stored on our servers from unauthorised access using commercially available computer security products (e.g. firewalls).

No electronic data or data transmission over the internet can be guaranteed to be secure from intrusion or malicious action. If you are required to enter a password to access our site or a third party site accessed through our site, you are responsible from keeping the password confidential and for complying with any other security procedures about which you are notified. We require that you do not disclose your password to anyone else and do not reuse passwords across different services.

When we disclose personal information in accordance with this Privacy Policy, it may be accessed from, transferred to, and/or stored outside the country in which you are located. The data protection laws in that country may be of a lower standard than those in your own country. We will, in all circumstances, safeguard the personal information as set out in this Privacy Policy.

How can I access or correct information that SAT Pty Ltd holds about me?

In some countries, you have the right to access, or correct, the personal information that we hold about you. If you would like to request access to, or correction of, your personal information that we hold, please contact us using the details below.

To the extent required by applicable law, we will provide you with access to the information we hold about you, including for the purpose of correcting or updating that information, within a reasonable timeframe (or any time frame stipulated by the laws that apply to your request). If we are permitted to withhold some of your personal information and we choose to do so, we will advise you when responding to your request. If we refuse to provide you with access to or to amend, the information, to

the extent required we will notify you of our reasons for the refusal and how you may complain about the refusal.

Where permitted by law, we may recover from you our reasonable costs of supplying you with access to this information. However, we will not charge you for the making of the request, or to correct or update your personal information.

How can I contact SAT Pty Ltd about this privacy policy?

If you have a concern about your privacy or if you have any query on how your personal information is collected or used, please contact info@satpty.com or 1800 728 789.

If you are not satisfied with our response, you may also contact the body responsible for administering the privacy laws in your country. If you are in Australia, you can contact the Office of the Australian Information Commissioner.

How does SAT Pty Ltd manage the international transfer of data?

If you choose to provide us with your information as described in this Privacy Notice, SAT Pty Ltd may transfer that information to affiliates, partners, or other third-parties, located outside of your home country, for the purposes described in this Privacy Policy. If you are visiting from the EU or other regions with laws governing data collection and use that may differ from those of Australia, please note that you are transferring your information to Australia, which does not have the same data protection laws as the EU. We utilise standard contract clauses approved by the European Commission to legitimize data transfers from the EU to the US and other countries.

With knowledge of these risks, by providing your personal information you understand:

- your personal information will be used for the uses identified in this Privacy Policy; and
- your personal information will be transferred to Australia.

European Data Protection Laws

If you are based in the EU during your interactions with us, use of personal information must be based on one of a number of legal grounds, and we must advise you of these. The principal legal ground for use of your personal information are as follows:

- **Consent:** where you have consented to our use of your information (you will have been presented with a consent form in relation to any such use and may withdraw your consent).
- **Contract performance:** where we are required to collect and handle your personal information in order to provide you with the services that we have contractually agreed to provide to you, e.g. Licensing, etc.
- **Legal obligation:** where we need to use your personal information to comply with our legal obligations.
- **Vital interests:** where we need to process your personal information in order to protect the vital interests of you or another natural person, e.g. where you require urgent assistance.
- **Public interest:** where we need to process your personal information in order to carry out a task that is in the public interest.
- **Legitimate interests:** where we use your information to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights.

The legal grounds for our use of the sensitive categories of personal information are:

- **Consent:** where you have explicitly consented to our use of your personal information. You may withdraw your consent to the use of your personal information.

- **Vital interest:** where we need to process your personal information in order to protect the vital interests of you or another natural person where you or the other person is physically or legally incapable of giving consent.
- **Legal claims:** where your personal information is necessary for us to establish, exercise or defend any legal claims.
- **Substantial public interest:** where we need to process your personal information for reasons of substantial public interest set out in EU law or the laws of the member state in which you are based.

You have the right to ask us not to process your personal information for marketing purposes. We will inform you if we intend to use your information for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by not opting in when we invite you to participate in our marketing activities, or by opting out. You can also exercise the right by contacting us and requesting that we remove you from our marketing program.

In addition to the rights outlined elsewhere in this Privacy Policy, under certain conditions you may have the right under EU data protection law to ask us to:

- provide you with further details on how we use and process your personal information;
- delete personal information we no longer have grounds to process; and
- restrict how we process your personal information while we consider an inquiry you have raised.

In addition, under certain conditions, you have the right to:

- where processing is based on consent, withdraw the consent;
- lodge a complaint with a supervisory authority;
- object to any processing of personal information that we process on the “legitimate interests” or “public interests” grounds unless our reasons for the underlying processing outweighs your interests, rights and freedoms; and
- object to direct marketing (including any profiling for such purposes) at any time.

You can exercise these rights by contacting SAT Pty Ltd, as advised above.

These rights are subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege).

Does this Privacy Policy apply to third-parties linked to from the SAT Pty Ltd site?

No. If you visit the site of a third party, you may be asked for personal information to use the products or services offered. These companies have their own privacy and data collection policies. SAT Pty Ltd is not responsible for the privacy practices of these third-party services or applications. We recommend carefully reviewing the user terms and Privacy Policy of each third-party service, website or application, prior to use.