

Privacy Policy

1. PURPOSE AND APPLICATION

SAGE recognises the importance of protecting the personal information it collects from individuals associated with SAGE's business. The purpose of this policy is to provide an outline of the way SAGE manages personal information in accordance with the Australian Privacy Principles and the Privacy Act 1988 (Cth).

SAGE takes its obligations under the Privacy Act seriously and will take all reasonable steps to comply with the Australian Privacy Principles and the Privacy Act to protect the privacy of all personal information that it holds.

2. DEFINITIONS

In this policy, the following words or phrases mean:

"personal information" means information relating to an individual, including an opinion, which is provided to SAGE as part of its business relationship with others, whether the information is correct or not. The information may personally identify an individual or make the person's identity reasonably apparent.

"sensitive information" means information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, membership of a trade union, sexual practices, criminal record or health information.

"SAGE" includes SAGE Group Holdings Ltd and its related entities.

3. COLLECTION AND USE OF PERSONAL INFORMATION

SAGE collects and hold personal information such as (but not limited to):

- the names of employees and proprietors of organisations and clients;
- postal and email addresses, telephone and facsimile numbers;
- financial details including bank account information and credit card numbers; and
- insurance details, education and employment history, skills and work experience and professional affiliations.

SAGE collects personal information:

- directly from you or other persons acting on your behalf;
- from third parties; and
- from publicly available sources.

SAGE may send personal information to its subsidiary in India which provides a range of internal services to SAGE and also provides services to its clients. SAGE's India subsidiary agrees to comply with this policy and the Australian Privacy Principles.

In the event that SAGE collects sensitive information, it will not be used for any purpose without your express permission.

In the event that unsolicited personal information is collected by SAGE, SAGE will take reasonable steps to destroy or de-identify that personal information.

Where possible, individuals will have the option of interacting with SAGE anonymously or using a pseudonym.

SAGE does not use government related identifiers such as Tax File Numbers or Medicare Numbers to identify individuals or the personal information that SAGE collects from individuals.

SAGE will not disclose personal information to any organisation without your prior consent.

4. PURPOSE OF COLLECTION

Our purpose in collecting and holding personal information about an individual is so that it can be used for activities such as:

- providing services to clients;
- engaging contractors;
- handling complaints;
- managing employee records; and
- business development and direct marketing.

SAGE may collect information for the provision of direct marketing unless you have informed SAGE in writing in accordance with section 9 of this policy that you do not want to receive such information. SAGE will provide an "opt out" option to individuals who receive direct marketing from SAGE.

SAGE may be required to provide your personal information to other organisations to comply with its legal obligations such as auditors, legal advisers, the ATO, insurers and creditors.

5. STORAGE AND SECURITY

All personal information collected by SAGE is retained as a part of a database that is securely monitored and maintained. The personal information will not be made available to a third party without your consent, unless SAGE is legally required to do so.

SAGE will take all reasonable steps to protect the security of the personal information that it



holds. This includes taking appropriate measures to protect electronic materials and material stored and generated in hard copy.

Where personal information held by SAGE is no longer required and the law does not require it to be retained, SAGE will destroy such personal information by a secure means.