

# **Privacy Notice**

Your personal data has been collected by Huntsman Security, being the trading name of Tier-3 Security Limited Company No. 07134350, of 7-10 Adam Street, London WC2N 6AA, United Kingdom, and/or Tier-3 Pty Limited ACN 087 642 162 of Level 2, 11 Help Street, Chatswood, New South Wales 2067, Australia

## Purpose of processing

Huntsman Security processes your personal data for the purpose of carrying out the normal business activities of Tier-3 Pty Limited (Parent) relating to the development and commercialisation of its proprietary software. The normal business activities of Tier-3 Security Limited, the subsidiary company of the Parent (Subsidiary) are sales, support and marketing in the UK with regard to the commercialisation of the Parent's proprietary software.

## Basis of processing

If you provided your personal data to us via our website and opted in to receiving marketing communications from us, our processing of your personal information for marketing purposes is based on that consent. Otherwise, the basis of our processing of your personal data is that it is necessary for the purposes of the legitimate interests pursued by the Subsidiary and/or the Parent. These legitimate interests are as follows:

- to undertake or manage our relationship with your employer as a potential customer, customer, supplier or business partner;
- to promote our company and products, and to send cyber security industry relevant informational content;
- to comply with a legal action or law enforcement directive, or to protect Huntsman Security's legal rights and/or property; and
- internal purposes such as accounting, planning, record keeping and reporting.

## Recipients of personal data

The recipients of your personal data are the Subsidiary and the Parent. Your personal data is not shared with third parties unless it is needed in connection with the normal conduct of Huntsman Security's business, such as:

- business partners, where your needs are best served by one of our resellers or managed service provider partners rather than Huntsman Security directly (this may be for geographical reasons or due to the nature of the service you require);
- those we contract directly to provide services to us, including the provision of a Customer Relationship Management (CRM) solution, a business contact database solution and a lead generation service provider;
- if legal action or a law enforcement directive requires that we must do so; or
- it is deemed necessary by us to protect Huntsman Security's legal rights and/or property.

## Disclosure to overseas organisations

The Subsidiary is based in the UK. The Parent is based in Australia and has business partners in Japan, and the Philippines. There may be a need to share your personal data with a related company or business partner in one of these locations if you request information regarding our products and services, you are located outside the UK and we have a related company or a business partner in your geographical region.

If you provided your personal data to the Subsidiary, your personal data may be disclosed to the Parent in Australia for internal support services (accounting, marketing and legal support and record keeping).



In addition, your personal data may be included in our CRM solution, Salesforce, which is a cloud service with servers located in the United States. The European Commission has made an adequacy decision in respect of the level of data protection offered by the United States, limited to the Privacy Shield Framework. Salesforce has certified its relevant services under the EU-US Privacy Shield Framework.

For those jurisdictions where the European Commission has not yet made an adequacy decision, including Australia, your personal data will only be transferred to organisations that have entered into a contract with us containing the standard data protection clauses adopted by the European Commission.

#### Duration

Your personal data will be stored for the duration of our relationship with you, such as the term of any contractual relationship between us and your employer. However, some personal information may be stored in documents that we are required to keep by law for the minimum periods imposed by law.

You may unsubscribe from our mailing lists at any time by using the 'unsubscribe' option located at the end of each email.

#### Your rights

You have certain legal rights in relation to our collection, use, disclosure and storage of your personal data. If you wish to submit a request to us to access or rectify your personal data, or for any of the purposes listed below, please contact our Privacy Officer.

- You have the right to access the personal data we hold about you, have it rectified or erased.
- There are certain circumstances where you have the right to require us to restrict the processing we undertake in relation to your personal data.
- You have the right to receive your personal data (as provided to us) in a structured, commonly used and machine-readable form and to transmit that data to another data controller where our processing of your personal data is based upon your consent and the processing is carried out by automatic means.
- You have the right to object to our processing of your personal data when the basis on which we process your personal data is our legitimate interest.
- When the basis on which we process your personal data is your consent, you have the right to withdraw your consent at any time.
- If you are dissatisfied with our handling of your personal data, you have the right to complain to a supervisory authority, such as the Information Commissioner's Office in the UK or the Office of the Australian Information Commissioner.

#### **Privacy Policy and Contact Information**

Huntsman Security's Privacy Policy contains further detail on our processing of personal data and on how to make a complaint about a breach of the policy or applicable data protection laws. You can view the Privacy Policy on our website at <a href="http://www.huntsmansecurity.com/privacy-security/">www.huntsmansecurity.com/privacy-security/</a>.

Huntsman Security's data protection representative in the UK is the Subsidiary, contactable at 7-10 Adam Street, London WC2N 6AA, United Kingdom or <a href="mailto:privacyuk@huntsmansecurity.com">privacyuk@huntsmansecurity.com</a>.

If you have any questions about this Privacy Notice or the Privacy Policy, contact the Privacy Officer at Level 2, 11 Help Street, Chatswood, New South Wales 2067, Australia or <u>privacy@huntsmansecurity.com</u>.