

# Ramco Systems Australia Privacy Policy

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## 1 Introduction

Ramco Systems Australia Pty Ltd ABN 15 159 974 946 (“**we**”, “**our**” and “**us**”) takes its privacy obligations seriously and is fully compliant with the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth) (“**Privacy Act**”).

This Privacy Policy describes how we generally collect, store, use and disclose personal information.

We may change or update our Privacy Policy from time to time. At any time, the latest version of our Privacy Policy is available from our website at [www.ramco.com](http://www.ramco.com).

For customers who use our hosted solutions, you can request a copy of our privacy and data protection statement (see details below) which details our strict security and data handling practices in respect of customer data.

## 2 What is personal information?

In this Privacy Policy, “personal information” has the meaning set out in the Privacy Act. Essentially, personal information is information or an opinion about an individual who is identifiable or reasonably identifiable.

## 3 What personal information do we collect?

The types of personal information we collect depends on the circumstances in which the information is collected.

### 3.1 General information

We may collect contact details including:

- your name;
- address;
- contact details such as email address and phone numbers;
- bank account details
- your location or activity including IP address; or
- other information which is necessary in the circumstances (including in order to provide services to your organisation).

We may also collect information regarding the company you are employed at including company/employer name, role in company, sector of interest and locations of interest.

### 3.2 What information do we collect via your website activity?

If you visit the our website (at [www.ramco.com](http://www.ramco.com)) we will collect information sent from your browser to our website. This includes domain names, your browser application and language, your Internet Protocol (IP) address and access times. We also use “cookies” and “web beacons” to collect information during visits to our website and during chat sessions with Ramco personnel. This information may be used to recognise you as a previous visitor, or to track your activity on our site.

### 3.3 What information do we collect if you apply for a job with us?

If you apply for employment with us, we may collect information required to assess your application (via the online recruitment portal or otherwise) including:

- your employment history;
- your referee's contact information;
- reference information from your referee; or
- your qualifications.
- Your details about the current job.
- Your location
- Your residential address
- Your email address
- Your contact details
- Your telephone number/s.

### **3.4 What sensitive information do we collect?**

In this Privacy Policy, "sensitive information" has the meaning given in the Privacy Act. Examples of sensitive information include information about your health, race, religious beliefs, political opinions or professional association memberships.

We do not generally require you to disclose any sensitive information to us. If you do provide us with sensitive information, you consent to us collecting that information and using and disclosing that information for the purpose for which you disclosed it to us and as permitted by the Privacy Act and other relevant laws.

In addition to the types of personal information identified above, we may collect personal information as otherwise permitted or required by law.

## **4 How do we collect your personal information?**

We collect personal information in a number of ways as mentioned in this Policy. The most common ways we collect personal information are:

- directly from you when you provide it to us or our agents or contractors or customers or clients;
- via our website or when you interact with us online (including through our social media pages, recruitment portal and discussion forums);
- from publicly available sources;
- from our related companies; and
- from third parties such as our customers who use our cloud computing services or from referees if you apply for a position as an employee or contractor with us.

## **5 For what purposes do we collect, use and disclose your personal information?**

We collect personal information for various purposes. The specific purposes for which we use and disclose your personal information will depend on the circumstances in which we collect it.

In general we collect, use and disclose personal information so that we can provide you with our products or services and for purposes connected with our business operations or if you are a prospective employee or an employee.

For example, we collect, use and disclose personal information to:

- respond to you if you have requested information (including via our websites or via an email or other correspondence you send to us);

- provide products or services to our customers (which may include you, your organisation or third parties) or to receive products or services from our suppliers (which may include you, your organisation or third parties);
- administer surveys, competitions or other promotional activities or events conducted, sponsored or managed by us or our business partners;
- improve our services;
- verify your identity, address, age or eligibility to participate in our marketing or promotional activities, or to ensure that we are dealing with the correct person;
- consider you for a job with us (whether as an employee or contractor) or in the context of other relationships with us;
- contact you about future employment opportunities;
- provide you with information about working for us
- address any issues or complaints that we or you have regarding our relationship; and
- contact you regarding the above, including via electronic messaging such as SMS and email, mail, phone or in any other lawful manner.

We may also use or disclose your personal information:

- for the purposes for which we collected it (and related purposes which would be reasonably expected by you);
- for other purposes to which you have consented; or
- as otherwise authorized or required by law.

We also perform analysis using de-identified and aggregated data sets.

## **6 Can we use your personal information for marketing our products and services?**

We may contact you to let you know about products or services that we provide. This may include products or services from related companies. We may contact you via mail, telephone, email or SMS.

You can opt out of receiving these communications at any time by contacting us using the details below.

## **7 What happens if you don't provide personal information?**

If you do not provide the personal information we require in the circumstances, we will not be able to perform the function for which we need to collect the information. For example, we may not be able to:

- provide you or your organisation with products or services, or receive products or services from you or your organisation;
- respond to your inquiry;
- consider your employment application; or
- allow you to receive marketing information from us.

## **8 Who do we share your personal information with?**

We may disclose your personal information to third parties in connection with the purposes described in **section 5** of this Privacy Policy.

For example, we may disclose your personal information to:

- our employees, business partners and related corporate bodies;
- our contractors and other third parties that provide services to us (including website and data hosting providers, and other suppliers);
- our accountants, insurers, lawyers, auditors and other professional advisers and agents;

- payment system operators;
- if you are an individual contractor to us or a prospective employee, to our related companies and HR related service providers (e.g. for outsourced payroll processing);
- any third parties to whom you have directed or permitted us to disclose your personal information (e.g. referees);
- an actual or potential buyer in connection with an actual or proposed purchase, merger or acquisition of any part of our business;
- third parties that require the information for law enforcement or to prevent a serious threat to public safety;
- otherwise as permitted or required by law; and
- other people where we have your consent.

Where we disclose your personal information to third parties (including as described in section 9 below) we will use reasonable commercial efforts to ensure that such third parties only use your personal information as reasonably required for the purpose we disclosed it to them and in a manner consistent with the Australian Privacy Principles.

## **9 Do we disclose personal information to recipients located outside Australia?**

We may disclose personal information to our related bodies corporate, service providers and other third parties described above who are located outside Australia, including those located in Australia, Singapore, India or any other country where we have business operations either directly or through our business partners [eg. the United States].

## **10 How do we store and secure personal information?**

We store personal information on computer databases and/or in hard copy and will take reasonable physical and electronic security measures to protect any records that we hold which contains your personal information. However, our physical and virtual networks and computing infrastructure are protected by industry leading security measures and industry best practice protocols. For example:

- as part of our Information Security Management System, we implement a range of policies and procedures in respect of both logical and physical security controls;
- we are certified for compliance with the ISO 27001:2013 standard on Information Security; and
- our security team performs log monitoring using a standard tool which has the capability to detect and notify any unauthorised access to our networks and databases.

We destroy personal information in a secure manner when we no longer need it.

Nothing in this Privacy Policy restricts, excludes or modifies or purports to restrict, exclude or modify any statutory consumer rights under any applicable law including the *Competition and Consumer Act 2010* (Cth). However, to the extent that liability cannot be excluded due to the operation of any law (or subject to any other agreement we have with you), we exclude all liability (including in negligence) for the consequences of any unauthorised access to, disclosure of, misuse of or loss or corruption of your personal information.

We may store your personal information in a secure way in Australia, Singapore, India or any other country where we have business operations either directly or through our business partners.

## **11 Access to or correction of personal information**

Subject to the exceptions in the Privacy Act, you have a right to access the personal information we hold about you. You can make a request to access or to delete at any time by contacting us using the details below.

If you request access to your personal information, we will provide it in accordance with the Privacy Act. We may ask you questions to verify your identity and we may charge an administration fee for granting access to your personal information.

If your personal information is stored by your employer or another organisation using one of our hosted and / or managed payroll solutions, we ask that you contact your employer ( as a data controller) or the other organisation to seek access in the first instance. This is because we hold personal information on behalf of those organisations and we generally do not access customer data stored in our hosted solutions except for payroll processing and related services like statutory filing obligations.

We try to maintain your personal information as provided to us by you or your employer accurately as reasonably possible . We encourage you to contact us if the personal information we hold about you is incorrect or to notify us of a change in your personal information or you may change your personal information directly if you have access to our solution . You can contact us using the details below.

## **12 Links, cookies, web beacons and use of our websites and applications**

We may use “cookies”, “web beacons” and similar technology on our websites and in other technology applications. The use of such technologies helps to improve the usefulness of our websites and applications and to enhance the your experience of our services.

If you prefer not to receive cookies you can adjust your Internet browser to refuse cookies. However, our websites may not function properly or optimally if cookies have been turned off.

## **13 How can you contact us?**

If you have any questions, comments or complaints about our privacy policies or your personal information, or if you'd like a copy of this Privacy Policy, please contact us at [Privacy@ramco.com](mailto:Privacy@ramco.com) or in writing to:

K Satish Kumar  
The Chief Data Protection Officer  
Ramco Systems Ltd  
No. 64, Sardar Patel Road,  
Tharamani  
Chennai 600 113  
India  
Telephone: +91-44-6653 5000

We take complaints seriously and any complaint will be assessed with the aim of resolving any issue in a timely manner.

If you are not satisfied with the outcome of your complaint, you may contact the Office of the Australian Information Commissioner.