

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 complies 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.

For customers who use our hosted solutions, you can request a copy of our privacy and data protection statement 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 (e.g. if you are a Ramco Systems customer or user of our website, or if you are a prospective or current employee or contractor).

3.1 General information

We may collect information including:

- your name;
- address;
- contact details such as email address and phone numbers;
- bank account details;
- your location or activity including IP address; or
- any 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 our website (at 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 or are employed or engaged by us?

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

- your employment history;
- your referee's contact information;
- reference information from your referee;
- your qualifications;
- details about your current job;
- your location;
- your residential address;
- your email address;
- your contact details;
- your telephone number/s;
- your identity documents and proof of address;
- your age, marital status and creditworthiness; and
- information and data about your family / relatives for company medical insurance and any other purposes notified to you.

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.

Customers and users of Ramco Systems website or products:

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.

Prospective or current employees or contractors with Ramco Systems:

In accordance with applicable laws, we may collect and process sensitive information relating to your racial or ethnic origins, trade union membership, physical or mental health, medical conditions, dietary preferences, biometric data, criminal convictions and pending proceedings for any alleged offence. We may also collect information concerning your physical, physiological, genetic, mental, cultural, social or economic identity, which may fall within the definition of sensitive information.

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.

General purposes:

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, as well as if you are a prospective or current employee or contractor. 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 authorised or required by law.

Prospective employees or contractors of Ramco Systems:

In addition to the above, and in order to manage your prospective or current employment or engagement with us, we may collect, use or disclose your personal information to:

- identify and determine your eligibility for, and qualifications relevant to, your prospective employment/engagement with Ramco Systems;
- conduct pre-employment screening and verify information you have provided to us (including checking the accuracy and completeness of details such as qualifications, prior job details etc);
- conduct pre-employment vetting which may include conducting background checks in relation to criminal records, obtaining information from credit bureaus to check for credit worthiness and conducting reference checks in relation to an employee or contractor's suitability;
- assess and maintain records of an individual's work performance, attendance, disciplinary proceedings, and other employment/engagement records as required under Ramco Systems' internal policies and processes and applicable law;
- conduct employee disciplinary proceedings, when required for breach of employment/engagement terms, Ramco Systems' policies, codes of conduct and applicable law;
- conduct training;
- obtain and maintain employees'/contractors' health records and information for determining job suitability and providing employment/engagement opportunities and benefits as required under Ramco Systems' internal policies and applicable law (which includes requiring you to complete a medical questionnaire or undertake a medical examination, as the need arises);
- process and review salaries, bonuses and other benefits;
- provide employee/contractor references which include letters to third parties upon your request or requests from a third party with prior notification and consent from you;
- monitor your communications using Ramco Systems resources and facilities such as telephone, e-mail and internet traffic data i.e. sender, receiver, subject, date and time of text messages, attachments to e-mail, numbers called and duration of calls, domain names of websites visited, duration of visits, and files downloaded from the internet for reasons which include providing evidence of business transactions, ensuring that our business procedures, policies and contracts with employees/human resources are adhered to, complying with any legal obligations, monitoring standards of service, managing Ramco Systems' information security and data protection framework, staff performance, and for staff training;
- disclose information to tax and immigration authorities or any other government body as required in the public interest;
- carry out any activity to comply with applicable law, or defend Ramco Systems in any court proceedings;
- provide post-employment/engagement benefits and archiving for statistical purposes in an anonymised or pseudonymised format with appropriate encryption and technical safeguards; and

- any other matters relating to your employment/engagement with Ramco Systems as Ramco Systems considers to be necessary or appropriate, in accordance with applicable 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, in compliance with applicable laws. 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 or via the unsubscribe option contained in the relevant marketing communication.

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);
- any person seeking employment references about you;
- any pension or insurance companies with whom Ramco Systems has arranged benefits coverage for its employees;
- 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;

- any person to whom Ramco Systems is compelled or required to disclose information to under law or in response to a competent or government agency;
- any person where public interest or our interests require disclosure (where permitted by law);
- otherwise as permitted or required by law; and
- any other person 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 in India.

10 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 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.

11 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 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.

12 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 or in writing to:

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.