



Privacy Policy

October 2025

5 Orangegroove Ave,
Unanderra, 2526 NSW

Rev	Date	Revision Description	Author	Owner	Approver
1.0	01/09/15	Original version	AC	AC	Execs
1.1	24/10/18	Correction for references to removal business	TS	DP	DP
1.2	12/11/19	Change of ownership	AC	KB	AY
1.3	21/4/2022	Change of ownership	AC	AF	MgtG
1.4	16/10/2025	Change of ownership and content updated	TM	TM	AF

Contents

1. Preamble	3
2. Personal Information.....	3
3. Liability.....	3
4. Collection of Information.....	4
5. Use and Disclosure of Information.....	4
6. Retention of Information.....	5
7. Data Quality.....	5
8. Data Security	5
9. Openness and Accessibility to Data	5
10. Complaints	5

1. Preamble

- 1.1. Micromax Pty Ltd (including Micromax Pty Ltd T/A TCS Instruments or TCS BI(MMX) as an organisation recognises the need for the correct handling of information gathered in the course of business. This Privacy Policy explains how we collect, use, store, and disclose personal information in accordance with the Privacy Act 1988 (Cth) – Compilation No. 103 and the Australian Privacy Principles (APPs).
- 1.2. MMX clients, prospective clients, business associates and staff all have a right to have confidence that the information MMX stores and processes is handled in a manner which upholds their best interests. To this end MMX is undertaking and will continue to undertake all reasonable measures to comply with the National Privacy Principles as outlined the Australian Privacy Commissioner.
- 1.3. This policy applies to all personal information collected by MMX, including information collected via our website, social media platforms, email, phone, and in-person interactions.

2. Personal Information

- 2.1. For the purposes of MMX Privacy Policy the term Personal Information is defined as any information that describes an identifiable person. The person may be a staff member, a client, a prospective client or a business associate. A person is identifiable if the information provides the address, full name, phone number or similar information that could result in the person to whom the information pertains being contracted.

2.2. What Personal Information We Collect

We may collect the following types of personal information:

1. Name, date of birth, and contact details (address, email, phone)
2. Employment or education/qualification details
3. Financial information (e.g., bank account details, credit card information)
4. Identification documents (e.g., driver's license, passport)
5. Online identifiers such as IP addresses, cookies, and usage data.

We collect information directly from you wherever possible. In some cases, we may collect information from third parties with your consent.

2.3. Our Obligation

We are required to comply with the Australian Privacy Principles (**APPs**) in the *Privacy Act*. The APPs regulate the manner in which personal information is handled throughout its life cycle, from collection to use and disclosure, storage, accessibility and disposal.

We are also required to comply with more specific privacy legislation in some circumstances, such as:

- applicable State and Territory health privacy legislation (including the Victorian *Health Records Act*) when we collect and handle health information in the relevant jurisdiction; and
- the *Spam Act* and the *Do Not Call Register Act*

3. Liability

Despite MMX commitment to policies that protect the rights of individuals to privacy MMX will not accept liability for loss or damage resulting from the disclosure of information provided to MMX.

4. Collection of Information

4.1. MMX will only collect the information required in the normal course of business, example;

- Online forms, applications, and surveys
- Emails, phone calls, and face-to-face meetings
- Our website and social media channels
- Third parties, with your consent or as permitted by law

4.2. At all times the collection of information will be visible and obvious to the individual to whom the information pertains. In other words, MMX will not collect information without the consent of the individual.

4.3. The Means of Collection of Personal Information include:

- 4.3.1. Providing web pages into which an individual may enter their details to make an enquiry or request a service such as a quote.
- 4.3.2. Providing then collecting printed forms for the client to complete with information necessary to provide a quotation or for other purposes.
- 4.3.3. Staff asking questions and recording the details for subsequent use.

4.4. In all of the above cases, MMX will endeavour to ensure that the informant understands why the information is being requested and that the information will be handled in accordance with this agreement. We do not collect personal information without your knowledge or consent unless legally permitted.

4.5. We collect and use personal information for purposes including, but not limited to:

- Providing goods and services
- Managing client or employee relationships
- Recruitment and human resources management
- Compliance with legal obligations
- Marketing and promotional communications (where consented)
- Improving our products, services, and website functionality
- Responding to inquiries, complaints, or legal requests

4.6. The Personal Information collected

The type of personal information that we collect about you depends on the type of dealings you have with us. For example, if you:

- 4.6.1. **are a client of the company**, we will collect your name, job title, address, contact details, information about our dealings with you, the legal areas that are of interest to you and information about the events and seminars that you have attended;
- 4.6.2. **are involved in a matter that we are working on**, we may collect your name, contact details and information about the relevant matter;
- 4.6.3. **ask to be placed on one of our mailing lists**, we will collect your name, address and contact details;
- 4.6.4. **supply goods or services to us**, we will collect your name, address, contact details and financial details for payment purposes;
- 4.6.5. **send us an enquiry or provide us with feedback**, we will collect your name, contact details and details of your enquiry or feedback;
- 4.6.6. **apply for a job with us, we will collect the information you include in your job application**, including your cover letter, resume, contact details and referee reports;
- 4.6.7. **are involved in a dispute with our client, we will collect your name**, address, contact details and relevant file numbers held by our client.

4.7. Note that MMX may use electronic means such as 'cookies' to make repeat visits to our web sites more effective for the web site users. However, any information will be recorded for statistical purposes only and will not be used to establish the identities of the web site visitors. Web site visitors will only be identifiable if they choose to voluntarily enter their details into a provided web data entry form.

5. Use and Disclosure of Information

5.1. Primary Purpose

5.1.1. MMX will only use the information provided by individual for the purpose required by its normal business operations. MMX will disclose the information to suppliers and business partners where either the supplier and/or business partner require the information in order to assist MMX in the provision of services for the customer.

5.1.2. We may disclose personal information to:

- Service providers, contractors, and business partners
- Regulatory authorities, law enforcement, or legal representatives as required by law
- Other third parties where you have consented
- Where possible, we ensure that third parties comply with privacy laws when handling your information

5.2. Secondary Purposes

5.2.1. MMX may also use the information to create mailing lists (email, fax, postal or other) to make its customers aware of related services that may benefit from. Wherever such mailing lists are employed, MMX will ensure that the customer has the clear ability to request that they be removed from the list.

6. Retention of Information

6.1. MMX retains information collected on its customers in the course of its business dealings for the normal statutory period for the retention of such information. This ensures that in the event of an issue arising relating to particular business transaction all relevant information available for its resolution.

We take reasonable steps to protect personal information from misuse, loss, unauthorised access, modification, or disclosure. Measures include:

- Secure servers and databases
- Encrypted transmission of sensitive data
- Restricted access to authorised personnel only
- We will retain personal information only for as long as necessary to fulfill the purpose for which it was collected or as required by law.

6.2. Cross-Border Disclosure

If personal information is transferred overseas, we will ensure that the recipient complies with privacy laws and provides an equivalent level of protection.

7. Data Quality

- 7.1. MMX will take all reasonable steps to ensure that the information recorded about an individual is correct and up to date. Where an individual feels that information being held about them is incorrect and would like the information corrected then they should contact the MMX Privacy Officer (see below).
- 7.2. We hold personal information in a number of ways, including in hard copy documents, electronic databases, email contact lists, and in paper files held in drawers and cabinets. Paper files may also be archived in boxes and stored offsite in secure facilities. We take reasonable steps to:
- make sure that the personal information that we collect, use and disclose is accurate, up to date and complete and (in the case of use and disclosure) relevant;
 - protect the personal information that we hold from misuse, interference and loss and from unauthorised access, modification or disclosure; and
 - destroy or permanently de-identify personal information that is no longer needed for any purpose that is permitted by the APPs.

8. Data Security

- 8.1. MMX takes data security seriously and is constantly examining its systems and practices to identify possible avenues for unauthorised use of information and taking appropriate steps.
- 8.2. Currently, MMX Internal systems are protected by firewalls, VPN secure tunnels, password protection and physical security. Wherever information is collected via web site passwords are used to protect information from unauthorised web based access.

9. Openness and Accessibility to Data

- 9.1. Where a customer has any concerns regarding information MMX may be storing or using they may request that copies of all information stored be provided by MMX.
- 9.2. The requests should be made in writing or by email to MMX and MMX will endeavour to provide copies of the information within a reasonable timeframe.
- 9.3. If a customer discovers that information held about them is incorrect or unnecessary they should contact the MMX, preferably in writing. MMX will endeavour to have the corrections entered into the MMX systems within a reasonable time frame.
- 9.4. Changes to This Policy
We may update this Privacy Policy from time to time. The current version is available on our website. We encourage you to review it regularly.

10. Complaints

- 10.1. If you have a complaint about how we have collected or handled your personal information, please contact MMX and we will endeavour in the first instance to deal with your complaint and take any steps necessary to resolve the matter within a week.

Please ask management if there are any queries in relation to any of the above statements.



Director Signature,

Date: October 2025