

Saab Australia Pty Ltd

Privacy Policy

1 Policy summary

Purpose	This Policy provides guidance on the Australian Privacy Principles and Saab's responsibility in relation to them and should be read in conjunction with Saab's Privacy Policy Handbook.
Policy Statement	Saab is committed to maintaining private and sensitive information in accordance with the <i>Privacy Act 1988</i> (Cth) and any amendments (the Privacy Act).

2 Business Rules

The Privacy Act and the included Australian Privacy Principles (**APPs**) are applicable to Saab and its business operations.

Saab recognises the importance of protecting personal information, which it may be required to collect from individuals who become associated with its business. The purpose of this Policy is to ensure that any individual who provides information to Saab is protected according to the requirements of the Privacy Act.

For the purpose of this Policy, “**information**” is collectively described as:

“**Personal information**” means information or an opinion relating to an individual which may be provided to Saab as part of its business requirements either in material form or not, and whether true or not. Such information or opinion may personally identify an individual or make the person's identity reasonably apparent. Common examples are an individual's name, signature, address, telephone number, email, date of birth, medical records, bank account details, employment details and commentary or opinion about a person.

“**Sensitive information**” means information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, or criminal record, that is also personal information; or health information about an individual; or genetic or biometric information or biometric templates.

Saab takes seriously its obligations under the Privacy Act, and as such, will take all reasonable steps in order to comply with the Privacy Act and protect the privacy of personal and sensitive information that it holds.

2.1 Collection and Use of Information

Saab collects personal and sensitive information from clients, customers, employees, contractors and other individuals where it is necessary for our business purposes only.

The main reasons for the collection, holding and use of personal and sensitive information include, but are not limited to, provision of services, responding to an individual's request, maintaining contact with clients, keeping clients and other contacts informed of Saab's services and related developments including selling and marketing of products and extended range of services, applying customer satisfaction surveys, notification of events, general management and reporting purposes, recruitment, taxation, superannuation, insurance, tender submissions, business development, and management of contractors, volunteers and job applicants.

Saab may collect, hold and use personal information, such as, but not limited to, names of employees and proprietors of organisations, addresses, telephone numbers, e-mail addresses, job titles and professional affiliations. In the event that sensitive information is collected by Saab, such information will not be used for any purpose without the express consent of the individual.

If Saab collects, holds or uses personal information in ways other than as stated in this Policy, it will ensure it does so in accordance with the requirements of the Privacy Act.

Individuals always have the opportunity to elect not to receive further sales or marketing information from Saab by writing to the HR Manager at 21 Third Avenue, Technology Park, Mawson Lakes SA 5095, or if Saab has contacted the individual by email, by using the unsubscribe function in that email.

Employee records are not generally subject to the Privacy Act and therefore this Policy may not apply to the handling of information about employees.

2.2 Disclosure of Information

Saab does not routinely disclose personal information to other organisations unless:

- a) use or disclosure is permitted by this Policy or otherwise required or permitted by the Privacy Act or other laws, regulations or professional standards;
- b) the individual gives their consent;
- c) it believes it is necessary to provide individuals with a product or service which they have requested;
- d) it believes it is necessary for maintaining or related to a partner, employee or contractor's role at Saab;
- e) protecting the rights, property or personal safety of any member of the public or a client of Saab or the interests of Saab;
- f) some or all of the assets or operations of Saab are or may be transferred to another party as part of the sale of some or all of Saab's business.

Service providers of Saab will sometimes have access to personal information held by Saab and may collect or use it from or on behalf of Saab. Saab requires service providers to adhere to this Policy and not to keep, use or disclose personal information provided to them for any unauthorised purposes.

2.3 Transfer of information outside Australia

Saab Australia is part of a global network. As such, Saab Australia may from time to time give access to personal and sensitive information to other companies within the Saab group of companies. This use will be provided for the overall management and operations of the Saab group companies. Saab Australia exchanges personal and sensitive information between Saab offices internationally, including but not limited to:

Brazil	Korea	Thailand
Czech Republic	Latin America	United Kingdom
Finland	Malaysia	United States
Germany	North America	Sweden
India	Singapore	Ireland
Indonesia	South Africa	

This means personal and sensitive information may be transferred and used outside of Australia. Saab Australia will take all reasonable steps to ensure that the recipient of the information does not breach the APPs in relation to the information.

2.4 Storage, Access and Retention of Information

All personal and sensitive information collected by Saab will be retained as part of a database, which will be securely monitored and maintained. Some or all of this information may be available to partners and authorised staff of Saab for use in accordance with this Policy.

From time to time Saab may make use of external service providers for the storage and processing of personal and sensitive information. This includes, by way of example, the use of cloud storage

and processing servers located in the Republic of Ireland.

Saab will take all reasonable steps to protect the security of the personal and sensitive information that it holds. This includes appropriate measures to protect electronic materials and materials stored and generated in hard copy.

Where information held Saab is no longer required to be held, and the retention is not required by law or contained in a Commonwealth record, then Saab will destroy such personal or sensitive information by a secure means.

2.5 Access to Information

Upon reasonable notice, Saab will make available for inspection by an individual all personal or sensitive information that it holds in relation to that individual, except in the limited circumstances where Saab is permitted to withhold this information (for example, where granting access would infringe another person's privacy).

If an individual wishes to know what personal or sensitive information Saab holds about them, they may contact Saab by writing to the HR Manager at 21 Third Avenue, Technology Park, Mawson Lakes SA 5095.

In the event that any part of the personal or sensitive information that the individual inspects is determined to be incorrect or out of date, then Saab will make such alteration in compliance with the corrected advice provided by the individual, unless it is impracticable or unlawful to do so.

If an individual wishes to have their personal or sensitive information deleted, upon notice in writing, Saab will take reasonable steps to delete it (unless the information needs to be kept for legal, contractual, auditing or internal risk management reasons).

In the event that there has been unauthorised access to, or disclosure of, personal information and this data breach is likely to result in serious harm to the individuals to whom the compromised information relates, Saab will notify the Privacy Commissioner, and where practicable, all individuals affected by, or at risk from, the data breach.

2.6 Compliance

If an individual has any concerns regarding the privacy of personal or sensitive information held by Saab, including Saab's compliance with the APPs or a registered APP code, then the individual may make a written complaint regarding compliance to the Privacy Officer (normally the HR Manager) or the Managing Director who will then endeavour to resolve the complaint.

If an individual is not satisfied with Saab's handling of a complaint, they may wish to contact the Office of the Australian Information Commissioner (www.oaic.gov.au).

2.7 Sources of Information

Saab will collect personal information only by lawful and fair means.

Saab will collect most information directly from individuals. The information Saab collects may be provided in forms filled out by individuals, face to face meetings, email message, telephone conversations or by third parties. Saab may keep a record if an individual contacts them. In some instances, Saab may collect personal information from press reports or published mediums, and in such cases, it will endeavour to verify such details with the individual concerned.

Because of the nature of the business, it is generally impracticable for Saab to deal with individuals on an anonymous basis or through the use of a pseudonym, although sometimes this is possible (for example, when seeking staff or client feedback generally).

Saab acknowledges that there is no obligation for an individual to provide it with personal information. However, if an individual chooses not to provide Saab with personal details, it may not be able to provide the individual with a full range of services or reduce the ability of servicing the individual's organisation directly.

Should any employee require further information in relation to privacy, please see Saab's Privacy Policy Handbook or visit www.oaic.gov.au.