

OPUS Group Privacy Policy

You have come through to this page from a website which is owned and operated by OPUS Group Limited. In this policy, "us", "we" or "our" means OPUS Group Limited.

This policy sets out:

- what is considered personal information;
- what personal information we collect and hold;
- how and why we collect, hold, use or disclose personal information;
- how we secure personal information;
- use of personal information in direct marketing;
- how to seek access to and correct your personal information;
- how to make a complaint if you believe your privacy has been breached;
- whether we disclose personal information outside Australia; and
- changes to our privacy policy.

Our privacy policy is written primarily for the benefit of our customers, staff, and end users of our online services.

You should read this policy if you are:

- a customer or prospective customer who is accessing one of our websites;
- a customer who is sending us lists or databases of personal information that we are printing, mailing, archiving or e-mailing on their behalf;
- a customer who is using our IPALM™ system to run their website, manage their customer database, archive their documents, deliver e-mail or SMS or print campaigns, or as a fulfilment or order processing system for their end users;
- an end user of one of our customers who is using IPALM™ to provide one of the above services;
- an individual whose personal information may be given to or held by OPUS Group; or
- a person seeking employment with OPUS Group.

Scope

This privacy policy applies to personal information collected and/or held by the OPUS Group of companies.

When used in this policy, the term "personal information" has the meaning given to it in the Act In general terms; it is any information that can be used to personally identify you. This may include (but is not limited to) your name, age, gender, postcode and contact details (including phone numbers and email addresses) and possibly financial information, including your credit card, direct debit account information. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

This privacy policy only applies to companies in the OPUS Group. It does not apply to any other company, organization, or third party with which the OPUS Group does business.

The OPUS Group is comprised of the following companies: In Australia:

- CanPrint Communications (ABN 65 079 915 932), trading as CanPrint
- Communications, Infoservices, and Canberra Mailing and Envelopes
- Ligare Pty Ltd (ABN 51001787 275),
- McPhersons Printing Group (ABN 36 004 911308),
- OPUS Group Limited (ABN 48 006 162 876), and
- Union Offset Co. Pty Limited (ABN 58 008 458 099)

Legislation

Our companies operate exclusively in Australia. As such, we are bound by the following legislation:

- Australia -Australian Privacy Principles contained in the Privacy Act 1988 (Cth).

Kinds of personal information collected and held

The personal information we may collect includes:

- name;
- gender;
- age or birth date;
- mailing address or street address;
- contact details such as email address fax and telephone numbers;
- financial information such as debts, bank account, credit card details and results of bankruptcy checks;
- business details (Australian Business Number and Australian Company Number);
- Tax File Numbers of contractors and vendors; and
- your photograph or video surveillance footage (if you visit one of our sites);
- details of the products and services you have purchased from us or which you have enquired about together with any additional information necessary to deliver those products and services and to respond to your enquiries;
- any additional information relating to you that you provide to us directly through our websites or indirectly through use of our website or online presence through our representatives or otherwise;

- any additional information relating to you that you provide to us directly through our websites or indirectly through use of our website or online presence through our representatives or otherwise;

OPUS Group also automatically collects information about your computer hardware and software. This may include: IP address, browser type, domain names, access times and referring website addresses.

Sensitive Information

OPUS Group may also collect sensitive information (a particular type of personal information under the Privacy Act), where relevant to our functions and activities, such as:

- information concerning personal circumstances (such as a medical history or other health-related information);
- disabilities;
- criminal convictions (from security clearing assessments);

The sensitive information we collect is primarily information regarding job seekers as a part of employment process, and contractors who attend our sites.

Information collected on behalf of our Clients

OPUS Group provides cloud based hosting services for our clients. These services including hosting their website and online stores, management of their customer database archiving their documents, delivering direct marketing campaigns (by e-mail, SMS and postal mail), and order processing and fulfilment services.

When we collect information on behalf of our Clients, OPUS Group collects the information under the direction of our Client and has no direct relationship with the individuals whose personal data it processes.

Collection of personal information

Personal information you provide to us

Where possible we will collect your personal information directly from you. We usually collect information in the following ways:

- telephone
- face to face meetings;
- site security induction;
- on one of our websites (www.opusgroup.com.au; www.canprint.com.au; www.ligare.com.au; www.mcphersonsprinting.com.au; www.ipalm.com; www.infoservices.com.au; www.unionoffset.com.au; www.canmail.com.au);
- OPUS Group's social media websites or accounts; and
- on behalf of our customers as a part of the services we offer them.

Personal information collected by third parties

If we receive your personal information from another party we will contact you (if we have sufficient information to do so and it is reasonable in the circumstances). Some exceptions to advising you may arise when:

- you have provided consent or reasonable expect the collection to occur;
- we are contracted to store or process your information on behalf of one of our customers and they have confirmed that are authorised to provide this information to us;
- the collection is for the purposes of a personnel issue; or
- the collection is for the purposes of litigation or legal advice.

There may also be instances in which we receive your personal information from our contracted service providers, who have collected your information on our behalf.

Collection of personal information by technology

Web Server Logs

Our web servers automatically record some information from your web browser automatically, including your IP address, the time, the page you accessed and documents downloaded, the date and time of your visit, the page that you linked from to get to our website, and the type of web browser you are using. This information does not identify you and is not considered personal information under the Act.

Cookies

When you access any of our websites, we may send a "cookie" (which is a small summary file containing a unique ID number) to your computer. This enables us to recognise your computer when you visit our website, without bothering you with a request to register or log-in.

We also use cookies to measure traffic patterns, to determine which areas of our websites have been visited, and to measure transaction patterns in the aggregate. We use this to research our users' habits so that we can improve our online products and services.

If you do not wish to receive cookies, you can set your browser so that your computer does not accept them; however our online services may not function if you disable cookies.

Google Analytics

We use Google Analytics to collect information about visitors to our websites. Google Analytics uses first-party cookies and JavaScript code to collect this information. It anonymously tracks how our visitors interact with this website, including where they came from, what they did on the site including such things as newsletter registration.

You might also wish to read Google Analytics Privacy Policy. You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or use the opt-out service provided by Google.

Zendesk (formerly Zopim)

We use Zendesk to provide an interactive chat services for visitors to some of our websites. Zendesk uses cookies and JavaScript code to provide a one-on-one chat with an OPUS Group staff member.

You may wish to read the [Zendesk Privacy Policy](#). If you choose to use the chat service on one of our websites, any information you enter is communicated via the Zendesk servers.

NewRelic

We use NewRelic RPM to collect information about visitors to websites hosted in the IPALM™ cloud service. It anonymously tracks how visitors interact with the service, including where they came from, how well the site performed for them and any errors they received. You may wish to read the [NewRelic Privacy Policy](#).

Social Media Features and Widgets

Our web sites include social media features, such as the Facebook Like button and widgets, such as the "Share this" button or interactive mini-programs that run on our site. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our website. Your interactions with these features are governed by the privacy policy of the company providing it.

Purposes for collecting, holding, using and disclosing personal information

The primary purpose for which we collect information about you is to enable us

to perform our business activities and functions and to provide best possible quality of customer service. We collect, hold, use and disclose your personal information for the following purposes:

- to provide products and services to you;
- to maintain accurate records regarding the ownership of digital assets (e.g. artwork files) that we have archived for you;
- to provide you with news, information or advice about our existing and new products and services;
- to communicate with you including by email, mail or telephone;
- to manage and enhance our products and services;
- to personalise and customise your experience;
- to provide you with access to protected areas of our websites;
- to conduct competitions or promotions on behalf of OPUS Group and selected third parties;
- to verify your identity;
- to provide as part of business data to third parties if you have authorised us to do so;
- to conduct business processing functions for operation of our websites or our business;
- for our administrative, marketing (including direct marketing), promotional, planning, product/service development, quality control and research purposes, or those of our contractors or external service providers;
- to keep our information and property secure;
- to provide your updated personal information to us, our contractors or external service providers;

- to investigate any complaints about or made by you, or if we have reason to suspect that you are in breach of any of our terms and conditions or that you are or have been otherwise engaged in any unlawful activity; and/or
- as required or permitted by any law (including the Privacy Act).

OPUS Group does not sell, rent or lease its customer lists to third parties. OPUS Group may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, your unique personally identifiable information (e-mail, name, address, telephone number) is not transferred to the third party.

Information Collected on behalf of our clients

When we collect information on behalf of our Clients, OPUS Group collects the information under the direction of our Client, and has no direct relationship with the individuals whose personal data it processes.

OPUS Group works with our Clients to help them provide notice to their customers concerning the purpose information is collection.

Disclosure of your personal information

We may disclose your personal information to:

- our employees, contractors or external service providers for the operation of our websites or our business, fulfilling requests by you, and otherwise provide products and services to you, including without limitation, web hosting providers, IT systems administrators, network administrators, debt collectors, and professional advisers such as accountants, solicitors, business advisors and consultants;
- our existing or potential agents, business partners or joint venture entities or partners;
- specific third parties authorised by you to receive information held by us;
- the police, any relevant authority or enforcement body, or your Internet Service Provider or network administrator, for example, if we have reason to suspect that you have committed a breach of any of our terms and conditions, or have otherwise been engaged in any unlawful activity, and we reasonably believe that disclosure is necessary; as required or permitted by any law (including the Privacy Act).

Security of your personal information

OPUS Group secures your personal information from unauthorized access, use or disclosure. OPUS Group secures the personally identifiable information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure.

When personal information is transmitted to any of our web sites, it is protected through the use of encryption, such as the Secure Socket Layer (SSL) protocol.

Direct marketing materials

We may send you direct marketing communications and information about products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS or email, in accordance with applicable marketing laws, such as the Spam Act 2004 (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.

In addition, at any time, you may opt-out of receiving marketing communications from us by contacting us (details below) or by using the opt-out facilities provided (e.g. an unsubscribe link). We will then ensure that your name is removed from our mailing list. We do not provide your personal information to other organisations for the purposes of direct marketing.

If you receive communications from us that you believe have been sent to you other than in accordance with this policy, or in breach of any law, please contact us using the details provided below.

Direct marketing using personal information held by OPUS Group on behalf of our clients

All information held on behalf of our Client is controlled by the Client. OPUS

Group does not use information collected on behalf of its client in its own direct marketing.

Clients that use OPUS Group to provide direct marketing services are required to do so in accordance with the Privacy Act and applicable marketing laws, such as the Spam Act 2004 (Cth).

If you receive communication from one of our clients that you believe has been sent to you other than in accordance with the applicable laws, please contact the client that you interact with directly.

Accessing and correcting your personal information

You may request access to any personal information we hold about you at any time by contacting us (details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We will not charge for simply making a request and will not charge for making any corrections to your personal information. If you make an access request, we will ask you to verify your identity. There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others, or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider

if the information requires amendment. If we do not agree that there are grounds for amendment, then we will add a note to the personal information stating that you disagree with it.

Accessing to information controlled by our clients

When we store personal information on behalf of our client, OPUS Group has no direct relationship with the individuals whose personal information it processes. An individual who seeks access to this information, or who seeks to correct, amend, or delete inaccurate data should direct his query to the OPUS Group Client (the data controller) with whom they have a direct relationship.

How you can complain about a breach of privacy

If you believe your privacy has been breached by us or have any questions or concerns about our Privacy Policy please contact us using the contact information below and provide details of the incident so that we can investigate it.

We have a formal procedure for investigating and dealing with privacy breaches. Once OPUS Group receives a complaint, whether it is in writing or verbal means, we will commence an investigation with the relevant business unit from which the alleged breach stemmed. The investigator will endeavour to determine the nature of the breach and how it occurred. We may contact you during the process to seek any further clarification if necessary. If a breach is found, we will escalate the matter to management so that the process can be rectified to

prevent any further breaches from taking place. We will also contact you to inform you of the outcome of the investigation. We will endeavour to resolve all investigations within a reasonable time.

We will treat your requests or complaints confidentially. An OPUS Group representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in a timely and appropriate manner.

Please contact OPUS Group at:

OPUS Group Limited

Attn: Privacy Officer

138 Bonds Road

Riverwood NSW 2210

Australia

Email: privacy@opusgroup.com.au

Disclosure of personal information outside of Australia

OPUS Group companies operating in Australia store personal information within Australia. OPUS Group companies operating in Singapore and New Zealand store personal information in the country of origin and in Australia.

We may disclose personal information to external service providers located overseas for some of the purposes listed above. We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

We may disclose your personal information to entities located outside of

Australia, including the following:

- Data hosting and Cloud-based IT service providers
- Other external service providers located overseas

Links

Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

Changes to our privacy policy

We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website. This privacy policy was last updated in March 2018.

A handwritten signature in black ink, appearing to read "R. Celarc".

Richard Celarc

OPUS Group Executive Chairman