
Privacy Policy

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Document Control

DATE	AUTHOR	VERSION	KEY CHANGES
28/04/23	Gizelle Manoli	0.1	Initial document developed.
29/04/23	Mel Fisher	1.0	Document reviewed and updated before distributing to the customer.
31/3/26	Gizelle Manoli	1.2	Document updated: <ol style="list-style-type: none">1 To include and incorporate references to iCognition Pty Limited as a company for which this policy applies2 To expand the kind of Personal Information we collect3 To include and explain use of Closed Circuit (CC) TV at Kapish's premises4 To amend contact details5 To amend information about your rights under privacy law

1. Protecting Your Privacy

Kapish Services Pty Ltd, Kapish EA Pty Ltd and iCognition Pty Limited (collectively known as “**Kapish**”) are a part of Magentus Group Pty Limited (ACN 127 151 026) (**Magentus Group**). We are bound by the Australian Privacy Principles (**APP’s**) contained in the *Privacy Act 1988* (Cth), and our Privacy Policy sets out how we collect, use, store and disclose your Personal Information.

By providing Personal Information to us, you consent to our collection, use and disclosure of your Personal Information in accordance with this Privacy Policy and any other arrangements that apply between us.

We operate primarily in Australia but also in New Zealand, so this Privacy Policy outlines how we collect and handle your Personal Information in accordance with the *Privacy Act 1988* (Cth) and the APP’s (Australia) and *Privacy Act 2020* (NZ). If you’re based in European Union or the United Kingdom, please see further below for further information about our privacy obligations to you.

We may change our Privacy Policy from time to time by publishing changes to it on our website. We encourage you to check our website periodically to ensure that you are aware of our current Privacy Policy.

2. Who is Kapish?

In this Privacy Policy, when you see the words “Kapish”, “Kapish EA”, “iCognition” “Magentus Group” “we”, “our” or “us”, we mean the following companies registered in Australia:

- Magentus Group Pty Limited (ACN 127 151 026)
- Magentus Group Services Australia Pty Ltd (ACN 087 743 879)
- Kapish Services Pty Ltd (ACN 144 850 162)
- Kapish EA Pty Ltd (ACN 116017 728)
- iCognition Pty Limited (104 128 001)

Kapish specialises in managing information in complex environments by integrating know-how, systems and people to provide information on an anywhere–anytime basis. We are a global leader in developing and managing secure technology solutions.

Magentus Group is an international technology and software group of companies specialising in health, secure enterprise information management services.

3. What is Personal Information?

Personal Information includes information or an opinion about an individual from which that individual is reasonably identifiable. For example, this may include your name, age, gender, postcode and contact details. It may also include financial information, including your credit card information.

4. What Sort of Personal Information Might We Collect and Hold?

In its business operations, Kapish may collect information in order to provide services to you, your employer, or a person providing services to you. Depending on circumstances, the types of information we collect could include:

4.1 General Information

This may include:

- a. name;
- b. title;
- c. gender; and
- d. date of birth.

4.2 Contact Information

This may include:

- a. phone number;
- b. email address; or
- c. postal address.

4.3 Location or Physical Location Information

Location may include:

- a. home or work address; or
- b. device location when you are using a Kapish software product or service. In these instances, your device location is otherwise only stored on your device and only if you have given your permission to identify your location.

4.4 Payment Details

Payment details may include:

- a. billing address;
- b. credit card or debit card;
- c. customer number or account number; or
- d. bank account details

4.5 Business Personal Information

Kapish may collect your business contact information when you:

- Submit a support request to our service desks, using our portal or by telephone
- Request help or information using our online support bots;
- Register for, or participate in an in-person event or webinar;
- Download a white paper or other materials;
- Agree to be recorded during a telephone conversation or virtual meeting;
- Login to a website feature or portal;
- Agree to receive regular newsletters about our products and services; and
- Visit a Kapish office or facility.

4.6 Technical and Device Data

Depending on the service you are using, we may collect technical data such as device ID, internet protocol (IP) address and city associated with the IP address, internet service provider (ISP) from your use of our technology assets (such as our software, website, mobile applications, and social media pages). The information we collect may also depend on your privacy and device settings.

We also use cookies to improve your use of our technology assets. For our Cookie Policy for more information.

Cookies are small data files that may be downloaded to your computer when you visit a website, which may be used to track your use of that website. Some of the examples of the types of Cookies used include:

- Critical Cookies, which are essential in order for you to visit and use the services on our websites.
- Session cookies, which are deleted after each visit.
- Third Party cookies, which are used by our trusted partners.

Cookies must be enabled in order to use web based software products offered by us and may be used to provide users of your computer with information that we think may interest the users of your computer.

We may use cookies from time to time to:

- track your usage of our website;
- support the functioning of our website;
- inform improvements to our website;
- gather data that helps us deliver marketing and advertising content that may be relevant to you;
- track your usage of our software products;
- improve your experience on our software products;
- provide you with better service when you use our software products;
- authenticate your access to our software products; and
- recognise you when you return to our software products.

This information may be linked to any personal information you may provide and may be used to identify you. You can adjust your internet browser to disable or warn you when cookies are used. However, disabling cookies will stop our software products from functioning fully.

4.7 Login and Verification Details

This may include login and verification details about user names, passwords, security questions or other information required for you to access our products and services.

4.8 Sensitive Information

Sensitive Information is a type of Personal Information which includes information or an opinion about an individual's racial or ethnic origin, political opinions, religious beliefs, sexual preferences or practices or criminal record, amongst other things.

We will always seek your consent to collect your Sensitive Information. However, there may be some instances required by law which require us to collect that without your consent, for example in the case of an emergency or if an exemption under the Privacy Act applies.

In some instances, we may collect Sensitive Information from you, for example, when:

- a. provide information for a public health or safety requirement; or
- b. are involved in a safety investigation, accident, claim, complaint or health related matter.

We will not use your Sensitive Information for direct marketing purposes.

5. How Does Kapish Collect My Personal Information?

We may collect your Personal Information in a number of ways, including:

- a. directly from you through our technology assets, phone calls to our service desks, when you submit an application form or send us a CV, or when you download and use digital apps, pass through our security monitored office areas, participate in a recorded telephone or conference call conversation, or choose to personalize your account with additional information such as a photo or social media profile.
- b. from other parties (your employer, personal representatives, credit reporting agencies, social media sites, and our related companies);
- c. from public sources, such as the internet;
- d. from organisations we list under “When do you disclose my Personal Information?” (see below); or
- e. when we’re required to do so by law.

If you don’t provide us with your Personal Information, we may be unable to provide you with our services, or your service provider may be unable to provide you with their services.

6. How Does Kapish Use My Personal Information?

We may hold, use and disclose your Personal Information as requested by, or consented to, by you to:

- provide services to you, your employer or your service provider;
- operate, protect, improve and optimise our website, services, business and our users’ experience, such as to perform analytics;
- send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- provide you with information about new services provided by Kapish or its service providers that may be of interest or relevant to your practice or business;
- monitor and keep secure our equipment, intellectual property, physical office locations, websites, accounts on social media platforms and technology assets;
- diagnose and fix problems related to our products;
- maintain endpoint and network security;
- prevent, investigate or provide notice of fraud or unlawful or criminal activity;
- comply with contractual, legal and regulatory obligations;

- carry out a corporate transaction, such as a merger or sale of assets of all or part of our group;
- comply with a subpoena or similar legal process or request;
- protect your safety or the safety of others;
- interact with our professional advisors (such as auditors, insurance companies, financial service providers and lawyers) as reasonably required for us to operate our business;
- inform third parties (including partners and resellers of products) to the extent that you consent to such sharing (where required by applicable law) or expressly direct us to interact with such third parties
- comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties; and
- consider your employment application.

7. Specific Information about CCTV

CCTV is installed and operated for the purposes of ensuring workplace safety, maintaining security, protecting property, incident investigation, and ensuring compliance with standards and regulatory requirements.

CCTV cameras are installed in overt and clearly visible designated public and workplace areas of our premises such as entry and exit points, reception areas, IT facilities and other secured areas. These areas are clearly marked with visible signage to notify individuals of the presence of surveillance. Cameras are not installed in private areas such as toilets, washing facilities, changing rooms, or lactation rooms.

The use of CCTV on these premises complies with the relevant laws in each State. Access to CCTV footage is restricted to authorised personnel and will be used and disclosed only where permitted by law, including where required for law-enforcement or regulatory purposes. Footage is securely stored and retained only for as long as reasonably necessary.

8. To Whom Might Kapish Disclose My Personal Information?

We may disclose your Personal Information to:

- a. our employees;
- b. third party suppliers and service providers (including providers for the operation of our cloud hosting services, websites and/or our business or in connection with providing our services to you);
- c. professional advisers, dealers and agents;
- d. payment systems operators (e.g.: merchants receiving card payments);
- e. our existing or potential agents, business partners or partners;
- f. anyone to whom our assets or businesses (or any part of them) are transferred;
- g. specific third parties authorised by you to receive information held by us; and/or
- h. other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

9. Why do we handle your Personal Information, including Sensitive Information?

We may collect, hold, use or disclose your Personal Information (including Sensitive Information):

- a. to carry out administrative and office functions;
- b. to communicate with you about your credentials, accounts or contracts with us;
- c. to improve our products and services by understanding how you interact with our products and services, partners, supplier, offers, marketing, websites and apps.
- d. to measure, test, analyse or improve our products or services, partners, offers, marketing and advertisements, websites and apps
- e. to conduct research and surveys about your experience with us;
- f. to improve and protect the security of our online engagement with you;
- g. to make business decisions for example confirming your identity, block, suspend or cancel an account according to applicable terms and conditions, or to facilitate corporate transactions.

9.1 Communications and Marketing

We may use your Personal Information to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send or by contacting us.

9.2 Compliance with Laws

We may disclose your Personal Information in special situations where we have reason to believe that doing so is necessary to identify, contact or bring legal action against anyone damaging, injuring or interfering (intentionally or unintentionally) with our rights or property, users or anyone else who could be harmed by such activities.

We will disclose your Personal Information where required to do so by law or subpoena or if we believe that such action is necessary to comply with the law and the reasonable requests of law enforcement or to protect the security or integrity of our Service.

9.3 Maintaining The Security of Your Information

We use a variety of physical and electronic security measures, including restricting physical access to our offices, network firewalls, maintaining secure databases and implementing access controls to keep Personal Information secure from misuse, interference and loss, and unauthorised access, modification or disclosure.

Kapish also monitors developments in security and encryption technologies as part of its continued data security efforts.

10. Will Kapish Transfer My Personal Information Outside Australia?

Kapish may hold your information on computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

We may disclose your Personal Information overseas to our service providers who assist us in providing services to you or your employer. If we do so it will be for the purposes of providing services to our customers and our service providers will be contractually bound to use your information only for the purposes of which it is disclosed.

If you are located outside Australia and choose to provide information to us, please note that we transfer the information, including Personal Information, to Australia and process it there. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

10.1 Additional Information for EU Residents

If you are a resident in the European Union and have provided us with your Personal Information in order for us to provide you with a service, or to carry out an instruction, your Personal Information will be handled, used and disclosed in accordance with the Australian Privacy Act 1988 (Cth), the Australian Privacy Principles, and this Privacy Policy.

11. Are there Additional Rules for Applications?

When we create applications (apps), we make sure they're developed in accordance with the Privacy Act, our Privacy Policy, and guidelines set by operating system providers such as Apple iOS, Google Android and Microsoft Windows. This includes any guidelines relating to privacy.

We'll only ever collect, use and disclose Personal Information provided to us through your use of our apps in the ways set out in this Privacy Policy.

Some apps might collect information about your location. This can help us give you or your employer the right service in the right place. Your employer may mandate the use of location services, but if they don't, we will give you the ability to turn off the location services setting on your mobile device. Just remember, this could result in Kapish being unable to provide you with the service you need.

Some Kapish apps may use interfaces, APIs and tools built into hardware you already own and use. Examples of these are voice-activated search functions using Apple's Siri® Voice Recognition Software, Microsoft's Cortana®, Amazon's Alexa® and Google Home's® functions. Your use of these interfaces is governed by the terms of use and Privacy Policies applied by their respective owners. Please read these carefully as Kapish does not control these elements of its service.

12. How Do Kapish Clients Manage My Personal Information?

Kapish specialises in providing secure cloud document management systems to enterprise clients, such as government agencies and similar clients. When we do so, we may have access to your Personal Information at the request of the client, when we provide support to those clients. Those Kapish employees with this type of access are carefully controlled and all work under contractual obligations of confidentiality and in accordance with our security certifications and policies. If you wish to obtain more information about Personal Information that one of our clients holds in our infrastructure, you should contact them in the first instance.

13. Links to Other Sites?

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over, and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Sometimes, we may not be able to provide you with access to all of your Personal Information and, where this is the case, we will tell you why.

14. Your Privacy Rights

We take your privacy seriously.

Subject to the conditions and restrictions set out under applicable law, you may have the following rights:

- You may request access to, and correction or deletion of, your Personal Information;
- You may object to the processing of your personal information, ask us to restrict its processing and request that we provide your personal information to certain third parties;
- You may have the right to complain to Kapish and/or a data protection authority about Kapish's collection and use of your Personal Information.

If you have consented to Kapish's collection and use of your Personal Information, you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect the processing of your personal information conducted in reliance on another lawful basis.

If your employer is a Kapish Client, then please contact them directly if you wish to exercise your privacy rights concerning your personal information, which they provide to Kapish to process for them. Under applicable law and the agreements we have in place with our Clients, Kapish cannot respond directly to your request in this event.

You may exercise your privacy rights by emailing your request to privacy@magentus.com. When you do so, please provide your complete name and your email address, which we'll use to communicate with you. Kapish will use this information only to verify you and process your request. If you are an authorised agent, then we reserve the right to request you demonstrate evidence of your authorisation, either by providing us with a signed permission form or a copy of your power of attorney granting you such authority.

If you have any questions about this Notice, please contact us at:

Privacy Officer – Kapish
46/600 Bourke Street, Melbourne VIC 3000 Australia
privacy@magentus.com

Once we receive your complaint, we will be in touch to let you know how long it might take us to investigate. Sometimes investigations can take up to 30 days. We will regularly update you as to the progress of your complaint. If you aren't satisfied with our response, you may contact the Office of the Australian Information Commissioner.

15. What Happens if Kapish Changes This Policy?

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page. If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website.

16. Contact Us

If you wish to contact us regarding this Privacy Policy, please contact the Kapish Privacy Officer:

- a. by email at privacy@magentus.com.au;
- b. by post at: The Privacy Officer, Magentus Group Pty Limited, Level 46, 600 Bourke Street, Melbourne VIC 3000; or
- c. by telephone on +61 2 6124 0800.