



## **Privacy Policy**

ICSGlobal Limited and its related companies and trusts (ICS, we or us) recognise the importance of protecting the privacy and the rights of individuals in relation to their personal information. This document is ICS's privacy policy and it tells you how ICS collects and manages your personal information.

ICS respects your rights to privacy under the Privacy Act 1988 (Cth) (Act) and complies with all of the Act's requirements in respect of the collection, management and disclosure of your personal information.

### **What is your personal information?**

When used in this privacy 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 your name, address, telephone number, email address and profession or occupation. If the information ICS collects personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

### **What personal information do we collect and hold?**

The information we collect about you depends upon what dealings you have with ICS. ICS may collect the following types of personal information about you:

- your name, age or date of birth;
- contact details, including your mailing or street address, email address, telephone number and facsimile number;
- profession, occupation or job title;
- your employment history, if you apply for a job with ICS;
- details of the products and services that ICS have supplied to you or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries;
- if you invest in or through ICS, information relating to you and your investment including security holding details and balances, bank account details and tax file numbers.

ICS may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users use our website.

**We are required to collect your name, address, date of birth and other verification information under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth).**

ICS collects your personal information directly from you unless it is unreasonable or impracticable to do so. In some circumstances, personal information may be provided to ICS by other parties such as share registry.

## **Cookies**

In some cases we may also collect your personal information through the use of cookies. When you access ICS's websites, we may send a "cookie" (which is a small summary file containing a unique ID number) to your computer. Cookies enable ICS's websites to track user traffic patterns and to better serve you when you revisit the website. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.

## **What happens if we can't collect your personal information?**

If you do not provide ICS with the personal information described above, some or all of the following may happen:

- we may not be able to provide the requested services to you, either to the same standard or at all; or
- we may be unable to tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful

## **For what purposes do we collect, hold, use and disclose your personal information?**

ICS operates the following businesses:

- as a listed company that invests and manages technology related investments; and
- its main operating business and investment is Medical Billing Collection in the UK .

ICS collects personal information in order to carry on the above businesses, to improve services and to communicate with our investors/shareholders. Personal Information may also be disclosed between ICS's businesses and related companies.

ICS also collects, holds, uses and discloses your personal information for the following purposes:

- to assess the performance of ICS's website and to improve the operation of the website;
- to update our records and keep your contact details up to date;
- to process and respond to any complaint made by you; and
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country.

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy. ICS may combine or share any information that ICS collects from you with information collected by any of ICS's related companies.

### **To whom does ICS disclose personal information?**

ICS does not disclose your personal information, except as stated below. ICS takes reasonable steps to ensure that third party recipients do not use personal information for their own purposes and that those parties comply with ICS's privacy policy.

Parties to whom ICS may disclose relevant personal information include:

- regulatory authorities where required by law including the Australian Securities Exchange and the Australian Securities and Investments Commission;
- related parties and entities of ICS; and
- parties to whom ICS has outsourced various functions. Those parties may include the providers of share registry services.

### **How can you access and correct your personal information?**

You may request access to any personal information ICS holds about you at any time by contacting us (see the details below). Where ICS holds 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). ICS may charge you a fee to cover its administrative and other reasonable costs in providing the information to you. ICS will not charge for simply making the request and will not charge for making any corrections to your personal information.

There may be instances where ICS 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, ICS will give you written reasons for any refusal.

If you believe that personal information ICS holds about you is incorrect, incomplete or inaccurate, then you may request us to amend it. ICS will consider if the information requires amendment. If ICS 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.

You may contact ICS's Privacy Officer by:

Post: Privacy Officer, ICSGlobal Limited, Level 3, 20 Bond Street.

## **What is the process for complaining about a breach of privacy?**

ICS requests that complaints about breaches of privacy be made in writing, so we can be sure about the details of the complaint. Our Privacy Officer deals with privacy complaints and any complaints should be directed to ICS's Privacy Officer using the contact details above. ICS will attempt to confirm as appropriate and necessary with you your understanding of the conduct relevant to the complaint and what you expect as an outcome. ICS will inform you whether we will conduct an investigation, the name, title, and contact details of the investigating officer and the estimated completion date for the investigation process.

After ICS have completed its enquiries, we will contact you, usually in writing, to advise the outcome and invite a response to our conclusions about the complaint. If we receive a response from you, we will assess it and advise if ICS has changed its view.

## **Do we disclose your personal information to anyone outside Australia?**

ICS does not disclose personal information to parties located overseas.

## **Investors/Shareholders of ICS**

ICS has outsourced its registry function to Boardroom Pty Limited. Boardroom has developed a privacy policy covering the collection and management of personal information that Boardroom collects on ICS's behalf. You may obtain a copy of Boardroom's privacy policy at Boardroom's website at [www.boardroom.com.au](http://www.boardroom.com.au) or by contacting Boardroom by:

Email: [privacyofficer@boardroomlimited.com.au](mailto:privacyofficer@boardroomlimited.com.au); or

Post: The Privacy Officer, Boardroom Pty Limited GPO Box 3993 Sydney NSW 2001; or

Phone: 1300 737 760

You should contact Boardroom's Privacy Officer if you have a complaint about privacy or would like details of your personal information in your capacity as an investor/shareholder/and your enquiry or complaints relates to Boardroom's collection, holding or use of your personal information. For your protection, Boardroom may only disclose personal information to you if its internal procedures (eg. verifying your identity) are satisfied. If you are not satisfied by Boardroom's response to your privacy concerns you should contact Boardroom's Privacy Officer. However if your personal information is relating to a securities holding which is a broker sponsored CHESS holding, you will need to contact that broker to update your registered name or address.

## **Security**

ICS takes all reasonable security measures to protect personal information from loss, unauthorised access, destruction, misuse, modification or disclosure.

## **Changes to our privacy policy**

ICS may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on ICS's website at [www.icsglobal.com.au](http://www.icsglobal.com.au).

This privacy policy was last updated on 23 October 2014.