

M2M Connectivity Privacy Policy

Protecting the security and privacy of your personal information is important to M2M Connectivity Pty Ltd ABN 14 102 703 319 (“M2M Connectivity”) and to the way we conduct our business in compliance with laws on privacy and data protection in the countries in which we operate. We hope this Privacy Policy will help you understand what personal information M2M Connectivity collects, how it is used and with whom it may be shared.

We only collect personal information where it is necessary to perform our functions and activities and provide goods and services to you. We will only disclose your personal information as set out in this Policy.

About us

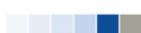
We provide a range of telecommunication hardware and services targeting the M2M market including services from third parties such as telecommunications carriers. Most of our customers are users of M2M/IoT hardware and related services.

Your personal information

Personal information held by us may include your name, date of birth, current and previous addresses, telephone or mobile phone number, email address, bank account or credit card details, occupation, driver’s license number, mobile network information including PIN numbers, user names and passwords.

We may also hold details of your M2M Connectivity services as well as certain details about your interests.

Occasionally, you may need to provide personal information about other individuals to us (e.g. about your authorised representatives). If so, we rely on you to inform those individuals that you are providing their personal information to us and to advise them that we can be contacted for further information (see ‘How to contact us’ at the end of this privacy statement).



How we collect personal information

We collect personal information in a number of ways, including:

- directly from you, for example, when you provide information by phone, in application forms or other agreements, or when you submit your personal details through our websites;
- from third parties such as our related companies, credit reporting agencies or your representatives;
- from the organisations identified under “When we disclose your personal information”;
- from publicly available sources of information;
- from our own records of how you use your M2M Connectivity hardware and services;
- when legally required to do so.

How we use your information

Your information may be used to:

- verify your identity;
- assist you to subscribe to our services;
- provide the hardware and services you require;
- administer and manage those services;
- inform you of ways the hardware and services provided to you could be improved;
- conduct appropriate checks for credit-worthiness and for fraud;
- research and develop our services;
- gain an understanding of your information and communication needs in order for us to provide you with a better service; and
- maintain and develop our business systems and infrastructure, including testing and upgrading of these systems.

Your personal information is collected so that we, our related bodies and our sales channels can promote and market services to you, including by way of direct mail, telemarketing, email, and SMS. This is to keep you informed of products, services, and offers and may continue after you cease acquiring services from us.

When we disclose your personal information

In order to deliver the hardware and services you require, we may disclose your personal information to organisations outside of M2M Connectivity, including to providers of hardware and services to M2M Connectivity. Providers of hardware and services to M2M Connectivity include hardware vendors, telecommunications carriers and other third parties. Your information is disclosed to these organisations only in relation to us providing our hardware and services to you and may be used and disclosed by these organisations for the following purposes, in accordance with their privacy statements:

- to enable them to fulfil their obligations under their agreements with us;
- to contact you in certain circumstances;
- to continue to provide the services to you following expiry or termination of their agreements with us;
- to enable them to manage and administer their internal systems and procedures;
- to enable them to provide the services from data centres anywhere in the world; and
- in any other manner and to any other persons as notified by us to you.

These organisations may carry out our:

- customer enquiries
- customer relationship management functions;
- mailing operations;
- billing and debt recovery functions;
- information technology services;
- network usage monitoring;
- market research and marketing activities;
- SIM card management functions;
- device management and platform functions;
- support ticketing operations; and
- web usage analysis.

We take reasonable steps to ensure that these organisations are bound by confidentiality and privacy obligations in relation to the protection of your personal information.

In addition, we may disclose your information to:

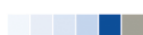
- your authorised representatives or your legal advisers (e.g. when requested by you to do so);
- credit-reporting and fraud-checking agencies;
- credit providers (for credit related purposes such as credit-worthiness, credit rating, credit provision and financing);
- our related companies;
- our professional advisers, including our accountants, auditors and lawyers;
- hardware vendors and providers of other cloud based platforms;
- other telecommunication and information service providers (for example, if you obtain services from other providers, we may need to disclose your personal information for billing purposes);
- government and regulatory authorities and other organisations, as required or authorised by law; and
- organisations who manage our business and corporate strategies, including those involved in a transfer/sale of all or part of our assets or business (including accounts and trade receivables) and those involved in managing our corporate risk and funding functions (e.g. securitisation).

How we store and secure your personal information

Personal information is principally held in electronic databases maintained within M2M Connectivity's computer network. However, your personal information may also be transferred to, stored and processed by third parties who provide services to us. We only transfer or disclose personal information to these organisations when it is necessary for the services they provide us.

M2M Connectivity maintains administrative, technical and physical safeguards designed to protect the personal information you provide against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use.

If we have given you (or you have chosen) a password which enables you to access certain parts of our website or other computer systems, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.



Transfer of personal information outside the country in which it was collected

M2M Connectivity's main computer servers are located in Australia. Some organisations to which we disclose personal information may be located, or may store the personal data on computer servers, outside Australia or outside the country in which the personal information was collected (e.g. if you are located outside Australia). If your personal information was collected in the European Economic Area ("EEA"), your personal information will be stored outside the EEA unless the organisation to which we disclose personal information is located in the EEA. Pursuant to applicable privacy / data protection laws (including the Australian Privacy Act 1988 and the EU General Data Protection Regulation), your personal information may be transferred by M2M Connectivity outside the country in which it was collected and outside the EEA for the purposes of providing our services where the recipient has provided adequate safeguards. The most common reasons for us transferring and disclosing information outside of Australia is because we provide cloud based device management services and we use service providers to perform some functions on our behalf and these service providers are located overseas or have servers overseas. We only transfer or disclose personal information to these organisations when it is necessary for the services they provide us.

These service providers are located, or have servers, in the following countries: Australia, New Zealand, United Kingdom, Europe, United States of America and Singapore.

Some countries may not provide the same level of protection for your personal information as the country in which your personal data was collected. However, where required, M2M Connectivity will enter into agreements with the recipients of the personal information to ensure that the recipient complies with M2M Connectivity's obligations under any applicable privacy / data protection laws.

How long we keep your personal information

We will keep personal information for as long as is necessary for the purpose or purposes for which it was collected and to comply with our legal obligations. We typically keep personal information for 6 years. We will take all reasonable steps to destroy, or erase from our systems, all data which is no longer required if we are legally able to do so.

Help us to ensure we hold accurate information

We take all reasonable precautions to ensure that the information we collect, use and disclose is accurate, complete and up-to-date.

However, the accuracy of that information depends to a large extent on the information you provide. That's why we recommend that you:

- let us know if there are any errors in your information; and
- keep us up-to-date with changes to your information such as your name or address.

Your rights

You have a right to access your information, subject to some exceptions allowed by law. If you would like to do so, please let us know. You may be required to put your request in writing for security reasons. We reserve the right to charge a fee for searching for and providing access to your information.

You may also have other rights, depending on the laws of the country in which you are located. For example, you may be entitled to object to direct marketing, ask us to correct mistakes or even ask us to delete your information. You may also be entitled to ask us to stop using your personal information in certain circumstances or transfer your personal information to another party of your choice. We will either do what you ask or explain why we can't or are not required to do what you ask, usually because of a legal or regulatory issue.

For certain uses of your personal information, we will ask for your consent. Where we do this, you have the right to withdraw your consent to further use of your personal information. In some cases we may not be able to provide services to you if you withdraw your consent.

How you can contact us

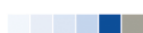
If you have any questions, concerns or comments, please contact us at:

M2M Connectivity Pty Ltd

1 Barrett Street Kensington

VIC 3031 Australia

e-mail: info@m2mconnectivity.com.au.



Resolving your concerns

You are entitled to complain if you believe that your privacy has been compromised by us. If you have a complaint, you can contact the person at M2M Connectivity you usually deal with or send a complaint to us at the above address. If your complaint is not satisfactorily resolved you may apply to the Office of the Australian Information Commissioner (OIA) or, if you are not located in Australia, the relevant privacy / data protection supervisory authority having jurisdiction in your country, to have the complaint heard and determined.

