PRIVACY POLICY

Quality Management System

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TopGN Pty Ltd (ABN 41 120 201 854) is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The APPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of the Office of the Australian Information Commissioner at https://www.oaic.gov.au/.

WHAT IS PERSONAL INFORMATION?

The Privacy Act 1988 (Cth) currently defines "personal information" as meaning information or an opinion about an identified individual or an individual who is reasonably identifiable:

1. Whether the information or opinion is true or not; and
2. Whether the information or opinion is recorded in a material form or not.

If the information or opinion does not disclose your identity or enable your identity to be ascertained, it will in most cases not be classified as "personal information" and will not be subject to this privacy policy.

WHAT INFORMATION DO WE COLLECT AND HOW DO WE COLLECT IT?

Examples of Personal Information we collect include names, addresses, email addresses, phone and facsimile numbers. This Personal Information is obtained by us in many ways including personal interviews/correspondence, by telephone, by email, via our website www.top-gn.com.au, from media and publications, from other publicly available sources and also from third parties. We don't guarantee website links or the policies of authorised third parties.

PURPOSE OF COLLECTION

We collect your Personal Information for the primary purpose of providing you the best service experience possible. We also use your Personal Information for providing information to our service providers/contractors and marketing. Your Personal Information may also be disclosed from time to time to maintenance and support personnel acting in the normal course

of their duties. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

SENSITIVE INFORMATION

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record, financial record or health information.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law.

THIRD PARTIES

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

DISCLOSURE OF PERSONAL INFORMATION

Your Personal Information may be disclosed in a number of circumstances including the following:

- Third parties where you consent to the use or disclosure; and
- Where required or authorised by law.

SECURITY OF PERSONAL INFORMATION

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure. In addition, our employees and contractors who provide services directly to you and also who provide services related to our information systems are obliged by company policy to respect the confidentiality of any Personal Information held by us. However, we will not be held responsible for events arising from unauthorised access to your Personal Information.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

ACCESS TO YOUR PERSONAL INFORMATION

Australian Privacy Principle 12 permits you to obtain access to the Personal Information we hold about you in certain circumstances, and Australian Privacy Principle 13 allows you to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing.

TopGN Pty Ltd will not charge any fee for your access request but may charge an administrative fee for providing a copy of your Personal Information.

In order to protect your Personal Information we may require identification from you before releasing the requested information.

MAINTAINING THE QUALITY OF YOUR PERSONAL INFORMATION

It is important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up to date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

POLICY UPDATES

This Policy will be reviewed every 12 months, or earlier to accommodate any changes to relevant legislation, and will be available on our website.

PRIVACY POLICY COMPLAINTS

If you have a complaint concerning the manner in which we maintain the privacy of your Personal Information, please contact us as set out below. All complaints will be considered by us and we may seek further information from you to clarify your concerns. If we agree that your complaint is well founded, we will, in consultation with you, take appropriate steps to rectify the problem. If you remain dissatisfied with the outcome, you may refer the matter to the Office of the Australian Information Commissioner.

PRIVACY POLICY ENQUIRIES

If you have any queries, or if you seek access to your Personal Information, or if you have a complaint about our privacy practices, please contact us at:

Address: Unit 605/89 Overton Rd, Williams Landing VIC 3027
E-Mail: info@top-gn.com.au
Phone: 0449 590 167