



PRIVACY POLICY

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1. PROTECTING YOUR PRIVACY

- a) This privacy policy (“**the Policy**”) applies to Calix Limited (ABN 36 117 372 540) (“**Calix**” or “**we**”) operations in Australia. The Policy explains how Calix handles personal information and complies with the requirements of the Privacy Act 1988 (“**Privacy Act**”).
- b) The Privacy Act provides extensive regulations about the collection, storage and use of information relating to individuals. It also contains some specific exemptions for organisations that have a need to collect, store and use information about individuals, one of which is to exempt the “acts and practices of employers in relation to employee records.”
- c) Calix is also covered by the Australian Privacy Principles, as set out in the Privacy Act, which cover all aspects of dealing with personal and sensitive information, not only those relating to employees.
- d) The Policy also applies to Calix operations outside of Australia. The Policy explains how Calix handles personal information and complies with the European Union General Data Protection Regulations (“**GDPR**”).
- e) The GDPR applies to organisations located within the EU and also applies to organisations located outside of the EU if they offer goods or services to EU data subjects. The GDPR also provides extensive regulations about the collection, storage and use of information relating to individuals and was established to protect fundamental rights and freedoms of natural persons and the right to the protection of personal data.
- f) Calix recognises the importance of protecting personal information, which it may be required to collect from individuals who become associated with its business. The purpose of the Policy is to ensure that any individual who provides information to Calix is protected according to the requirements of the Privacy Act and the GDPR.
- g) Calix takes its obligations under the Privacy Act and the GDPR seriously, and as such, will take all reasonable steps in order to comply with the Privacy Act and the GDPR to protect the privacy of individuals for whom we hold personal information.

2. PERSONAL INFORMATION

- a) Calix may collect personal information such as:
 - I. your name, current address details, previous address details, telephone number, email address;
 - II. financial information; and
 - III. employee and employment details and titles.
- b) Calix will not usually seek to collect personal information from you except where it is necessary to provide our products and services to you. If it is necessary for us to collect personal information, we will obtain your consent to collect and use such information.
 - I. You are able to withdraw your consent at any time, and will not be penalised by Calix for refusing or withdrawing consent.
 - II. You have the right to obtain from Calix the erasure of personal data concerning you without undue delay where you have either withdrawn your consent or your information is not needed anymore.

- c) Calix also collects information about your accounts and transactions with us.
- d) We may also collect information about you when you visit our website. Please refer to the website section of the Policy for further details.
- e) If there is another person named, for example additional company directors or business partners, in accordance with the provision of our products and services, you may need to provide their personal information and you warrant that the other person has consented to the collection of their personal information for the purpose it is being collected.

3. HOW CALIX COLLECTS PERSONAL INFORMATION

- a) Calix collects information in a variety of ways. Mainly we collect information from you when you knowingly provide it by telephone, in person, or in documentation such as forms filled out by you.
- b) We also collect information when you make an enquiry of us.
- c) We may also collect information when you use our website or social media, or by third parties.

4. USE OF PERSONAL INFORMATION

- a) Calix may require the collection of personal information from individuals to enable it to provide products and services to you. The reasons for the collection of personal information include, but are not limited to, practical service provision requirements and other legal requirements.
- b) Calix acknowledges that there is no obligation for an individual to provide personal information. However, if an individual chooses not to provide Calix with personal details, it may not be able to provide the individual with a full range of products and services or may reduce the ability of directly servicing the individual's organisation.
- c) Personal information is also collected by Calix for the purpose of selling and marketing of its products and extended range of services. Calix may also use such information to apply client satisfaction surveys and events.
- d) Your email address may be used for direct marketing purposes by Calix. You may choose to withdraw your consent or "opt-out" of receiving marketing material by sending a reply email stating that you wish to unsubscribe from the mailing list. Calix will not charge you any additional cost or in any way disadvantage you for choosing to "opt-out" of receiving marketing material.

5. SECURITY, STORAGE AND RETENTION OF PERSONAL INFORMATION

- a) All personal information collected by Calix will be retained as part of a database, which will be securely monitored and maintained by Calix. The data will not be made available to a third party, unless it is legally required and verified, without the consent of the individual who provided the personal information.
- b) Calix will take all reasonable steps to protect the security of the personal information that it holds. This includes appropriate measures to protect electronic materials and materials stored and generated in hard copy.
- c) Calix will only retain your personal data for as long as it is necessary for the stated purpose, taking into account our need to answer queries or resolves problems, provide improved and new services, and comply with legal requirements under applicable laws. This means that we may retain your personal data for a reasonable period after your last interaction with Calix.
- d) Where information held by Calix is no longer required to be held, and the retention is not required by law, then Calix will destroy or delete such personal information by secure means.

6. DISCLOSURE OF PERSONAL INFORMATION

- a) Calix may in the course of conducting our business provide your personal information to any of its subsidiaries, branches, or legally related companies, agents, dealers or contractors. We may also provide your personal information to any government bodies, auditors or lawyers.
- b) Calix may also disclose your personal information to third parties to meet the purpose for which it was submitted, if we have your consent to do so or otherwise when we are authorised or required by law to disclose the information.

7. OVERSEAS RECIPIENTS

- a) In addition to disclosures permitted under the Policy, we may disclose your personal information to other Calix offices outside of Australia or the jurisdiction of the GDPR but within our global network (**‘the Calix Global Network’**). We and the Calix Global Network may also utilise facilities or contractors outside of Australia or the jurisdiction of the GDPR to process or backup our information or to provide a certain service to us. Calix requires the Calix Global Network, service providers or contractors, who may be based outside the country from which you have accessed the Calix website or service, to comply with all relevant data protection laws and security requirements under the Privacy Act or the GDPR in relation to your personal data. You consent to the disclosure of your personal information to the Calix Global Network, service providers and contractors on this basis.
- b) While your personal information may be stored with the Calix Global Network, service providers or contractors, it will remain within Calix’s effective control at all times and the information remains subject to existing confidentiality obligations.

8. MINORS

- a) Calix does not knowingly solicit or collect personal data from children below the age of 12. If Calix discovers that it has inadvertently collected personal data from a child below 12, we will remove that child's personal data from Calix's records as soon as reasonably possible.

9. WEBSITE

- a) When you visit the Calix website, we or other agencies on our behalf and our internet service provider may monitor and make a record of your visit for statistical purposes, such as your server's IP address.
- b) The Policy is strictly limited to the collection, storage and use of personally identifiable information collected from you, in the course of business, and does not apply to any third parties. We have no control over the privacy practices or the content of any third party websites, and assume no liability for the privacy practices of these websites.
- c) Links on the Calix's website to external entities are not covered within the Policy.
- d) For more information, please see our online privacy policy.

10. ACCESS RIGHTS AND CONTACT DETAILS

- a) Calix acts as "data controller" for the personal data we process in the framework of this Policy. If you have any questions or comments regarding this Policy, our personal data collection practices, or about your personal information we have collected, please contact us in writing. All correspondence should be addressed to:

Attention: Company Secretary
Calix Limited
Level 1, 9 Bridge Street
PYMBLE NSW 2073
Fax: +61 (2) 8199 7444
Email: dcharles@calix.com.au

- b) The Privacy Act and the GDPR provides the right to access and amend personal information held by Calix. The release of information is subject to some exceptions such as information relating to existing or any anticipated legal proceedings, together with exceptions provided by the Privacy Act and the GDPR.
- c) A request will be responded to within a reasonable period after the request is made (usually 30 days) and will provide the information in the manner requested by the individual, if it is reasonable and practicable to do so.
- d) Calix reserves the right to charge a nominal fee if required for the retrieval of information requested. No fee will be charged for making of the request or for correcting the personal information.

- e) There may be limited circumstances where your request is refused or partially refused. If this occurs we will give you a written notice that sets out:
 - I. the reasons for the refusal, including the reasons why access cannot be granted in an alternative way (except where it would be unreasonable to provide those reasons);
 - II. how to make a complaint about the refusal; and
 - III. any other matter as prescribed by the regulations.
- f) If your request to correct is refused, you have the option of submitting a statement associated with your personal information. For more information contact the Company Secretary.
- g) Amendment of personal information will be conducted upon written or verbal request from you. You can write to the Company Secretary to do so.

11. ADOPTION, USE OR DISCLOSURE OF GOVERNMENT RELATED IDENTIFIERS

- a) In certain circumstances we may be required to collect government related identifiers such as your tax file number. We will not use or disclose this information unless we are authorised by law.
- b) We do not use any government related identifiers (E.g. Tax File Number, Australian Business Number) as identifiers within our organisation.

12. COMPLIANCE AND COMPLAINTS

- a) If an individual has any concerns regarding the privacy of personal information, then the individual may make a complaint to the Company Secretary at the contact details above.
- b) The Company Secretary will then endeavour to resolve the complaint within 10 working days. If resolution is not possible within this timeframe, we will contact you to discuss the matter further.
- c) If you still feel your issue hasn't been resolved to your satisfaction, then you have the right under both the Privacy Act and the GDPR to raise your concern with the relevant supervisory body such as the Office of the Australian Information Commissioner or the Information Commissioner's Office in the United Kingdom.

13. DATA BREACHES

- a) Calix will comply with the provisions of the Privacy Act and the GDPR in relation to notifying the relevant supervisory authorities, and you if applicable, of any breaches of personal data.

14. CHANGES TO THE POLICY

- a) Calix reserves the right to make changes to the Policy at any time. We may amend the Policy by updating its posting on our website. We encourage you to regularly review this Policy to make sure you are aware of any changes and how your personal data may be used.

15. REQUESTING A COPY OF THE POLICY

- a) The Policy is available on Calix's website. On request, we may be able to provide you with a copy of the Policy in an alternate format.
- b) If you have any further enquiries, please contact by post or email using the contact details above.

A handwritten signature in blue ink, appearing to read "Peter Turnbull", is centered on the page.

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Peter Turnbull
Chair

Version adopted by the board on 23 April 2018