



Privacy Policy The Quantum Group

October 2019

Privacy Policy

1. About Quantum

The Quantum Group (**Quantium**) is an international group of companies with our head office based in Australia and operations in India, New Zealand, South Africa and USA. The nature of our business, the type of work we do, our business partners and the types of clients we work for are outlined on our website www.quantium.com. Our core business is to assist our clients to better understand their customers and suppliers.

2. Purpose of this Privacy Policy

The purpose of this Privacy Policy is to describe how we comply with Australian *Privacy Act 1988* (Cth) (**Privacy Act**), including the Australian Privacy Principles (**APPs**) and other Australian privacy and data protection laws (together, **Australian Privacy Laws**). We also wish to demonstrate our commitment to protecting an individual's privacy in all the work that we do.

We implement processes and safeguards that have been designed by us to meet requirements of the Australian Privacy Laws. These processes and safeguards ensure privacy by design, information security, and the minimisation of the handling of personal information about individuals regardless of where those individuals are located. We also segregate data entrusted to us by our business partners and clients, and we manage this data in accordance with agreed requirements as to confidentiality with their customers and suppliers.

Quantium does not have an establishment in the European Union. Some of our clients may have an establishment in the European Union, so we have developed our privacy and security processes and safeguards having regard to the requirements of the EU General Data Protection Regulation. We also seek to comply with data protection laws in countries other than Australia where we know that a device collecting data is being used in a particular country, although often we will not be in a position to know where a device is being used.

Our activities as conducted outside the European Union are activities consistent with Quantum being a 'data processor' of 'pseudonymised personal data' or 'anonymised personal data' relating to individuals as those terms are defined in the EU General Data Protection Regulation.

Our core business involves the receipt and handling of data about our clients' transactions with customers or suppliers after the personal identifier of any individual that is a transactor has been removed so that the individual transactor is not identified or reasonably identifiable by Quantum. As a result, we do not handle personal information in our core business. In some exceptional circumstances, we will agree to work on a client engagement that involves our analysis of personal information, but in all cases, we ensure that such work is done in accordance within strict protocols and safeguards that have been established by Quantum to ensure compliance with the Australian Privacy Laws and any other relevant privacy laws.

3. What is personal or sensitive information?

'Personal information' is information or an opinion about an individual who is identified or reasonably identifiable.

'Sensitive information' includes information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional association, trade association or a trade union, sexual preferences / practices, criminal record. Sensitive Information also includes health and genetic information about an individual.

4. How we analyse transaction data

We are responsible for the careful handling of all information that our clients entrust to us, including ensuring that we follow responsible business practices, and comply with Australian Privacy Laws.

Data relating to transactions of our clients' customers or suppliers is provided to Quantum only after our clients (or entities acting on their behalf) have de-identified personal information about individuals that are transacting our client's customers or suppliers. This ensures that Quantum does not receive transaction data about individuals that are transactors in a form which enables those transactors to be identified, or reasonably identifiable by Quantum.

Quantum does not conduct the de-identification process to remove personal identifiers of individuals, or otherwise hold any code that would enable re-identification of individuals. Quantum does not have any method or process to reverse engineer personal identifiers from the de-identified data. Quantum will also, where relevant, agree to contractual restrictions that prohibit reverse engineering of the de-identified data that we receive.

5. Client and Third-Party Data

Where we receive information for the purposes of providing services to a client, we receive this information from that client and not from any individual. These clients may include supermarkets, banks, insurance companies, telecommunications providers, government agencies and many others.

This Privacy Policy does not apply to our clients or other third parties. Each client and each provider of data to Quantum is responsible for providing and complying with its own privacy policy and complying with all privacy and data protection laws applicable to that client or other provider. Each of our clients is responsible for providing any required notice, obtaining any required consent, and offering and processing any applicable opt-out or similar choice option as required by applicable privacy and data protection laws. Please refer to the privacy policy, statement or notice for entities with whom you deal, or whose internet sites, mobile applications and other online services you access, to learn how they collect and use information about you.

We rely on our client to obtain any necessary consents before disclosing any information to Quantum. Notwithstanding this, we have in place practices and procedures to satisfy ourselves that any necessary consents have been correctly and properly obtained by our clients. This may include obtaining and reviewing our clients' privacy policies, making reasonable enquiries with our clients about their permitted use of personal information they hold on individuals, and obtaining contractual promises from our client that we are using any information received from a client in a manner that is consistent with an individual's consent.

6. How we disclose insights from data to our clients

The core services provided by Quantum to its clients are conducted to derive insights for clients that are provided at levels of aggregation or other deidentification that do not enable recipients of those insights to re-identify any individual to whom these insights relate (except, as explained below, where we provide our clients with modelled scores about their own customers).

Information about deidentified individuals that are customers of our clients is protected by technical, operational and legal controls and safeguards designed to ensure that no customer of a Quantum client is reasonably identifiable by Quantum.

Some deidentified client data is provided to Quantum after removal of personal identifiers of individual transactors but with code that enables a single unique deidentified transactor to be associated with transaction data sets made available to Quantum from different Quantum clients. This is done through a

deidentified code linkage process managed by a third party to ensure neither the Quantum clients, nor Quantum, can determine that an identifiable individual is a client of multiple Quantum clients. By using a deidentified linkage code that enables linking of transaction data sets made available to Quantum from different Quantum clients, Quantum may draw inferences about an unidentified individual's behaviours, interests and preferences, and use these inferences to provide insights reports to our clients that our clients may use to improve the customer experience that they offer.

Audience segments are groups of aggregated anonymised identifiers that infer behaviour, preferences and/ or interests of a group of people. Quantum creates 'audience segments' by grouping users with common behaviours, traits or attributes inferred from analysis of the data that we receive data partners or clients. Audience segments are provided to clients and media partners and may be used to deliver advertisements or promotions targeted to that audience segment's inferred interest or preference without Quantum or the relevant Quantum client knowing the identity of individuals that are within that audience segment.

For example, an audience segment may be used to deliver an ad relevant to individuals within an audience segment that are users of a social media platform or a media platform, without disclosure or use of personally identifying information about individuals (all relevant information being handled by relevant parties within an isolated and controlled data eco-system only in deidentified form).

In some cases, we may provide our clients with insights about attributes, preferences or interests of individuals through our use and analysis of de-identified data. Where we do so, we will take all reasonable steps to ensure that this provision of insights by Quantum is in full compliance with Australian Privacy Laws and any other laws which we understand apply to that client.

Where insights from Quantum's data analytics services are provided to clients at an individual level, these insights are provided as modelled scores that are applied to de-identified data sets. Modelled scores are probabilities that a de-identified individual within any data set may behave in a particular way. The provision of any modelled scores to a client is subject to strict contractual provisions that require that client to use such modelled scores in compliance with all relevant privacy laws.

7. When do we receive personal information?

We collect and use personal information about individuals that is reasonably necessary for one or more of our business functions or activities, as follows:

- a. we collect personal information for recruitment, employment, business, operational and administration purposes and when an individual applies or accepts a job with us, we may collect sensitive information; and
- b. we collect personal information for the purposes of maintaining contact with our clients, to keep our clients informed of our products and services, to keep our clients updated on industry developments that may be of interest to them, to keep our clients updated on seminars and other events we are holding, or to otherwise undertake business to business direct marketing activities.

The types of personal information about individuals collected, received and used by us will depend on the functions and activities that are relevant for the collection as outlined below:

- a. where we are collecting information for recruitment, employment, business, operational and administration purposes, the information we collect may include an individual's photo, name, birth date, address, e-mail addresses, contact details (including contact details of the individual's emergency contact), tax file number, financial information (such as bank account details) and an individual's work history, references and personal background checks;
- b. where we are collecting information for the purposes of maintaining contact with our clients, to keep our clients informed of our services, to keep our clients updated on industry developments that may

- be of interest to them, to keep our clients updated on seminars and other events we are holding or otherwise to undertake business to business direct marketing activities, the information we collect may include photos, videos, individual's names, job titles, e-mail addresses and contact details; and
- c. where we are receiving information for the purposes of providing services to our clients, the information we receive will depend on the information provided by our client and the purpose for which it is needed. Such information may include photos, names, postcodes, addresses, dates of birth, email addresses, membership numbers and other information directly related to our clients' products and services being offered to our clients' customers.

To the extent that we receive any personal information from our clients (including where any information we receive from our clients is capable of re-identification of an individual), and we do not require that information to deliver our services to that client, we will notify the client and delete such information in accordance with this Policy.

In some exceptional circumstances, we will agree to work on a client engagement that involves our analysis of personal information. In these circumstances we will ensure that such work is done in accordance within strict protocols and safeguards that have been established by Quantum to ensure compliance with the Australian Privacy Laws and any other relevant privacy laws.

In these circumstances where we receive personal information (occasionally including sensitive information) from our clients, this information will (to the extent within Quantum's control as recipient) only be received by Quantum where necessary for the delivery of such services to our clients. This personal information is not shared with third parties or used for the purposes of targeted advertising. We also handle that personal information for a client in a data handling environment isolated and separated by reliable controls and safeguards from our de-identified data environment, usually by accessing the personal information in the client's own systems, behind their firewalls. When we are working entirely in our clients' own systems, we do not disclose any personal information back to Quantum or transmit the personal information to Quantum's systems, and always abide by the privacy controls and policies of our clients.

8. How we collect personal information from individuals

Any personal information collected by us is collected in the course of business, by lawful and fair means and in accordance with this Policy.

Where we are collecting information for employment, recruitment, business, operational and administration purposes, this information is generally provided by an individual by filling in forms, résumés, face to face meetings, email messages and telephone conversations. Subject to an individual's prior written consent, we may collect personal information about that individual from a third party (such as referees).

Where we are collecting information for the purposes of maintaining contact with our clients, or to undertake business-to-business direct marketing activities, the information we collect is generally provided by an individual by filling in forms, face to face meetings, email messages, business card, email signatures and telephone conversations.

Where we collect personal information directly from an individual, before collecting such information, we will, where practical and reasonable in the circumstances, notify that individual of:

- a. our contact details;
- b. the circumstances and the purpose of the collection;
- c. the main consequence (if any) if all or some of the information is not collected by us; and
- d. any third parties that we may disclose that information to (if any).

Where the information is received from a third party for employment, recruitment, business, operational and administration purposes, we may obtain an individual's consent to collect their personal information from third parties.

9. Use and disclosure of personal information

We only use personal information for the purpose for which it was given to us. We will only use personal information if it is reasonably necessary for one or more of our functions and activities. Such uses primarily include:

- a. for recruitment, employment, business operations and administration;
- b. to maintain contact with our clients, to keep our clients informed of our products and services, to keep our clients updated on industry developments, seminars and other events that may be of interest to them and to undertake business to business direct marketing activities; and
- c. to provide, maintain, improve or develop the services we offer to our clients, which include undertaking pricing, planning, research and statistical analysis. In this instance, we will only disclose personal information to the client that provided it. For the avoidance of doubt, information provided by our client to enable the delivery of services will only be used for that purpose and will not be used by Quantum for any other purpose without the prior written consent of the client.

We will not use any personal information of an individual for a secondary purpose unless:

- a. an individual would reasonably expect that we would use or disclose the personal information for that secondary purpose and that purpose is related to the primary purposes for which it was given to us.
- b. that individual has consented to the use of that personal information for the secondary purpose; or
- c. the secondary use or purpose is required or permitted under law.

We may disclose personal information for the purposes described in this Policy to:

- a. our related bodies corporate and Quantum Health and its related bodies corporate and shareholders
- b. our clients, in circumstances where that personal information was originally provided to us by that client;
- c. third party suppliers and service providers (including providers for the operation of our websites and/or our business or in connection with providing services to our clients);
- d. professional advisers, dealers, business partners and agents;
- e. anyone to whom our assets or businesses (or any part of them) are transferred;
- f. specific third parties authorised by you to receive information held by us; and/or
- g. other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law; and
- h. otherwise as may be required by law.

10. Direct marketing

Where we use personal information for the purposes of business-to-business direct marketing, we rely on the exception in the Privacy Act to do so. We will comply with APP 7 and the *Spam Act 2003* (Cth) in relation to any direct marketing by us, including:

- a. allowing an individual to opt out of receiving any further direct marketing from us; and

- b. in each written communication from us, setting out our business address, telephone number and, if the communication with that individual is made by electronic means, a number or address at which we can be directly contacted electronically.

11. Quality of information

Where we collect personal information from an individual directly, we take steps to ensure that the personal information we collect, use and disclose is accurate, up to date and complete. These steps include maintaining and updating any personal information when we are advised by an individual that their information has changed.

Where we collect personal information about an individual from a third party, we rely on that third party to ensure that information it collects is accurate, up to date and complete.

12. Security of personal information

We place a high degree of importance on data security and take all reasonable steps to protect any personal information that we hold from misuse, interference, loss, unauthorised access, modification or disclosure. These steps include:

- a. storage of such information in a secure environment;
- b. restricted access to such information to only those for whom such access is reasonable and necessary, including password protection and restricted physical access;
- c. the use of up to date hardware and software security measures; and
- d. establishing processes and procedures to ensure that we review any protections we have in place and ensure that these are operating correctly.

13. Retention of information

We retain personal information after we have used the personal information for the purposes for which we collected or received it. If we retain such information, it will only be used for the following purposes:

- a. as required by or under any applicable law, or a court / tribunal order;
- b. as required for professional indemnity insurance; and
- c. in accordance with our back-up archive policy.

When no longer required, Quantum will take reasonable steps to ensure that all such information is de-identified or destroyed in a secure manner and within a reasonable time frame.

14. Access to information

An individual may request access to their personal information held by us in accordance with section 19 below. Subject to any permitted exception under the Privacy Act, we shall give that individual access to that information. If an individual notifies us that the information we hold about them is not accurate, we will take reasonable steps to correct that information. To the extent that we have received any personal information from a client, we will notify our client that it has received a request from an individual to access or correct the personal information it has provided to us.

15. Unsolicited information received by us

Where we receive any personal information which we did not request or otherwise in error, we shall, as soon as practical, destroy that information or ensure that the information is de-identified. Our employees are given training to ensure that they are able to identify personal information received by us in error.

16. Cookies and anonymous identifiers

A cookie is a small file containing information specific to a user, passed through an internet protocol such as a web browser and stored on a device.

We use cookies, web beacons and other similar technology to track access to, and use of, our website. The information gathered is not personally identifiable and is used to improve our website and facilitate opt outs.

We may also receive cookie data, web beacon data, device information, log information, browser information and other anonymous identifier data from our clients and strategic partners about a person's use of our clients' and strategic partners' products and services. We receive and use this information to deliver products and services to our clients and strategic partners, including:

- a. to analyse trends and identify audiences and customers for our clients and strategic partners;
- b. to create audience segments that are categorised by common behaviours and preferences (these audience segments are used by our clients and strategic partners to enable them to conduct more effective marketing and advertising campaigns); and
- c. to measure the effectiveness of marketing and advertising campaigns of our strategic partners and advertisers.

The anonymised data may be collected for matching with offline data and may be shared with third parties for the purposes of marketing and targeted advertising.

If you wish to opt of receiving any targeted advertising from clients, strategic partners or advertisers, you may do so at this link: <https://www.quantium.com/opt-out/>

17. An individual's right to anonymity and pseudonymity

Nothing in this Policy restricts an individual's option to not identify themselves or use a pseudonym when dealing with us, provided that this right does not apply in relation to matters where:

- a. we are required or authorised by or under law, or court / tribunal order, to deal with an individual who has identified himself / herself; or
- b. it is impractical for us to deal with an individual who has not identified themselves or who has used a pseudonym (in a job application for example).

18. Cross-border disclosure of information

Quantium is an international business. We may disclose personal information about an individual to our overseas related bodies corporate for the purposes of delivering our services.

We may also be required by a client to disclose personal information about an individual to an overseas recipient, generally a related body of that client, for the purposes of delivering our services.

We will ensure that such information is only transferred as follows:

- a. in accordance with any applicable laws;
- b. where applicable, with the approval of our client; and
- c. the information being transferred is transferred to countries that have an adequate level of protection for the rights of the data subject.

19. How to contact us

If an individual:

- a. would like to access or inquire about any personal information we hold about that individual;
- b. has a query in relation to this Privacy Policy; or
- c. would like to make a complaint about our handling of an individual's personal information, please contact us using the details below.

This Policy relates to The Quantum Group Holdings Pty Limited (ACN 121 842 957) and each of its related bodies corporate.

Contact: **Peter Leonard**
The Privacy Officer
privacy@quantium.com.au

Address: **The Quantum Group Holdings Pty Limited**
Level 25, 8 Chifley
8-12 Chifley Place
Sydney, New South Wales
Australia 2000

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