



International Privacy Policy

commsgroup
cloud communications for business

Comms Group¹ and its wholly owned international subsidiaries are committed to providing quality data network, internet, cloud and voice products and services to corporate, government, telecommunications and IT related organisations and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

For our Australian businesses, please refer to the link below

[Comms Group Privacy Statement](#)

What is Personal Information and why do we collect it?

Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect include names, addresses, email addresses, phone and facsimile numbers. This Personal Information is obtained in many ways including but not limited to events, meetings, correspondence, by telephone and facsimile, by email, via our websites from our portals, from your website, from media and publications, from other publicly available sources, from cookies and from third parties.

We also collect information directly and indirectly from our contractors, suppliers, or agents such as:

- social media platforms like LinkedIn and Facebook;
- marketing lists, databases and data aggregation services;
- websites or websites hosted or operated by our contractors, suppliers, or agents;
- credit reporting agencies if you become our customer.
- Personal information that we may collect

We don't guarantee website links or policies of authorised third parties.

We only collect personal information where it is reasonably necessary for our functions or activities or as required by law.

These include:

- providing services to our customers;
- administering and managing our relationships with suppliers, customers and shareholders, including for billing, credit control and investor purposes;

¹ This policy applies for all our international operations, for services provided to customers outside of Australia, by and including Comms Group Limited, Comms Group Operations Pty Ltd, Comms Group (International) Pte Ltd (Singapore), SingVoip Pte Ltd, Comms Group International (UK) Limited, OnPlatinum ICT Pty Pte Ltd

- marketing and promotional activities to grow and promote our business;
- undertaking research and development to improve our services;
- obtaining services from other businesses;
- employing staff; and
- complying with our legal and regulatory obligations.

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 often defined in privacy legislation 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 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 such as your employer or contractors or service provider acting on behalf of your employer. 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

We are permitted to use or disclose personal information for the purpose for which it was collected as well as related purposes (but for sensitive information only purposes directly related to the Comms Group (International) and consented to by you). For example, when setting up an account the personal information we collect may be used or disclosed for related purposes such as credit checks, installing a service, investigating and resolving complaints or marketing other Comms Group products or services.

For direct marketing activities, when using personal information (but not sensitive information), we or third parties acting on our behalf, may promote our or other organisation's products or services to you using email, telephone, social media sites, post or other means. You are able to opt out of receiving direct marketing.

We may use and disclose personal information if required or authorised under a relevant Jurisdiction or country's legislation or a court or tribunal order, if a permitted general or health situation exists as defined in the relevant Jurisdiction's legislation or we believe the use or disclosure of the personal information is reasonably necessary for activities conducted by a law enforcement agency. In these instances, we do not need consent to disclose personal information.

For our contractors, suppliers, affiliates or agents, we use and disclose personal information in order to manage our relationship with them.

Personal information may be disclosed to credit reporting or credit collection agencies in accordance with the requirements of the relevant Jurisdiction's legislation.

We use third parties to assist us to provide products and services and administer our relationships with our customers and shareholders. We may disclose personal information about our customers or shareholders to a range of third parties, including:

- legal, accounting, insurance, or advisory consultants;
- sales agents and representatives, contractors, or suppliers;
- companies within the Commsgroup Group;
- complaint handling bodies, Government, or regulatory bodies;
- printers, mail distributors, couriers and dispatch centres; and
- IT service providers and data managers.

Being a telecommunications service provider means that personal information that we collect when providing telecommunications services may be disclosed in connection with directory assistance activities, for emergency assistance organisations or other critical services, security purposes or activities carried out by law enforcement agencies, the operator of the integrated public number database or in accordance with other relevant Jurisdiction's codes or legislation applicable to our industry.

Personal Information Disclosed Outside of your Jurisdiction

Some personal information we collect may be disclosed to persons or our contractors, suppliers, affiliates, or agents that are outside Australia.

Our:

- Customer service and marketing call centre operations are based in Manila, Philippines, and may access your personal information for the purposes of sales and marketing, customer service, provisioning, fault management, billing, or technical support;
- webhosting, database and document storage services involve personal information being transferred to IT service providers based world-wide;
- survey tools used for customer satisfaction surveys involve personal information being transferred to IT providers in the Philippines, Singapore, New Zealand, the United Kingdom and the United States of America.
- Representative for data subjects in the EU
We value your privacy and your rights as a data subject and have therefore appointed Prighter Group with its local partners as our privacy representative and your point of contact.
Prighter gives you an easy way to exercise your privacy-related rights (e.g. requests to access or erase personal data). If you want to contact us via our representative, Prighter or make use of your data subject rights, please visit the following website. <https://prighter.com/g/12945075397>
- Representative for data subjects in the UK
We value your privacy and your rights as a data subject and have appointed a UK representative, Neel Patel as Data Processing Officer. If you want to contact us via our representative, email privacy@commsgroup.global

To protect these disclosures and transfers, Comms Group has begun implementing the Standard Contractual Clauses (“SCCs”) that have been adopted by the European Commission, available online [here](#), and the UK Government, available online [here](#) to provide an adequate level of data protection for your personal information. The SCCs ensure that entities within the Comms Group and suppliers process personal information in accordance with the GDPR (or similar), which is widely recognised as a global benchmark of privacy protection.

Dealing With Us Online

This Privacy Policy also applies to personal information that you email to us, provide by using our website or provide via social media sites. We may store the Internet Protocol (IP) address of your computer when you visit our site. This information is used only to create broad demographic summaries of where our users come from. However, our use of these IP addresses does not go so far as to identify the actual users of the site. We collect personal information about the other websites that are visited by computers that are used to visit our site. This information may be aggregated to provide us with information about the types of webpages and websites, or particular webpages and websites, visited by computers that use our site.

Our website may use cookies and web-beacons. While cookies and web beacons can be used to statistically monitor and analyse the use of our site and to identify information about the computer used to visit our site, we do not use them for that purpose and will not attempt to use them to identify or target individual visitors to our website. Note that this privacy policy does not apply to, and Commsgroup is not responsible for, the use of, or the protection of information provided to, other websites linked to this website.

Security of Personal Information

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification, or disclosure.

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

You may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing.

Comms Group 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 an 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 may change from time to time and is available on our website.

Privacy Policy Complaints and Enquiries

If you have any queries or complaints about our Privacy Policy please contact us at:

Comms Group Limited

A: Level 3, 45 Clarence Street Sydney NSW 2000

T: 1300 42 66 67

E: privacy@commsgroup.global

If you believe that we have acted in a manner that breaches a relevant Jurisdiction's codes and legislation we recommend that you contact us first. We will investigate your complaint and notify you of the outcome. If you are dissatisfied with the outcome of your complaint, or you do not receive a response to your complaint within 30 days, you may be able make a complaint to your local regulator.

If this policy does not provide the information you require about how we deal with personal information, or you have any questions or comments, please feel free to contact us.