

## **DCC Ventures Privacy Policy**

### **1. OVERVIEW**

This Policy applies in relation to collection, retention, management, use, and disclosure of personal information by DCC Ventures Pty Ltd (ACN 633 089 942)

(DCC Ventures), and also referred to in this Policy as *we, us and our*).

DCC Ventures is committed to respecting the privacy of an individual's personal information including personal information relating to our clients, visitors to our websites and other members of the public.

In this Policy, personal information generally means information about an identifiable individual, or an individual who is reasonably identifiable (for example, a person's name, address, phone number or bank account number), regardless of whether the information or opinion is true or recorded in a material form.

If information does not disclose your identity or enable your identity to be ascertained, or if information is not "about" an individual but may incidentally enable an individual to be identified, it will in most cases not be classified as "personal information" and it will not be subject to this privacy policy.

### **2. APPLICATION OF PRIVACY LAWS**

DCC Ventures is a wholly owned subsidiary of QANTM Intellectual Property Ltd (ACN 612 441 326)(QANTM).

In addition to DCC Ventures, QANTM owns six other intellectual property (IP) services businesses:

- Davies Collison Cave Pty Ltd (ACN 613 954 368) (an incorporated patent and trade mark attorney business operating in Australia and New Zealand);
- Davies Collison Cave Law Pty Ltd (ACN 613 954 420) (an incorporated legal practice operating in Australia);
- Davies Collison Cave Asia Pte Ltd (UEN 201620043E) (an incorporated patent and trade mark attorney business operating in Singapore);
- Advanz Fidelis IP Sdn Bhd (MCN 1242306U) (an incorporated intellectual property prosecution and advisory practice operating in Malaysia);
- FPA Patent Attorneys Pty Ltd (ACN 613 950 342) (an incorporated patent attorney business operating in Australia and New Zealand);
- FPA Patent Attorneys Asia Pte Ltd (UEN 201831157W) (an incorporated patent attorney business operating in Singapore);
- Cotters Patent and Trade Mark Attorneys (an incorporated patent and trade mark attorney business operating in Australia); and
- ipervescence Pty Ltd (an intellectual property consultancy company operating in Australia).

DCC Ventures may sometimes deal with personal information relying on exemptions under applicable laws, examples of which may include (in relevant circumstances and subject to conditions specified in the relevant legislation) dealing with employee records, sharing of information with related bodies corporate, and in connection with providing services to relevant authorities. Any permitted handling of personal information under such exemptions will, to the extent of such permission, also be permitted under this Policy.

### **3. OUR OBLIGATIONS OF CONFIDENTIALITY AND YOUR CONSENT**

DCC Ventures and the other members of the QANTM Group that provide professional services operate independently of each other in the provision of professional services to their clients, in full compliance with the law, professional standards, ethical duties, and codes of conduct.

## **4. COLLECTION OF PERSONAL INFORMATION**

### **4.1 How we collect personal information**

In the course of conducting our business, we may collect personal information from numerous sources, including clients and potential clients, visitors to our website, business associates, suppliers of goods and services, shareholders and potential investors in QANTM. For example:

- we will record names, addresses and other pertinent details comprising personal information when we take instructions on a professional matter, and potential clients will provide personal information when completing forms associated with becoming a client of DCC Ventures;
- you may provide us with personal information when using our websites, attending events or presentations hosted by us, contacting us to request information, providing feedback or applying for employment, or in the course of normal business dealings.

Generally, this is collected directly from the individual, however sometimes it may be collected from publicly available sources, including social media platforms, information brokers and third parties. For example, in providing us with instructions on a professional matter, a person who is the authorized contact for a client matter may provide us with their own personal information, as well as information in relation to other members of their organization which may be relevant to the conduct of the matter.

### **4.2 Types of personal information collected**

The personal information which we collect may include, for example, names, dates and place of birth, contact details such as phone number, fax number, address and email, and banking and credit card details. We may conduct reference checks, and collect superannuation details, or family contact details in connection with considering applications for employment or contract roles.

Some information may be “sensitive”, as defined in the Privacy Act 1988, such as health information, dietary requirements, details of any disability, details of political or religious affiliations and details of any criminal record.

Sensitive information of this nature is only collected with your consent and only to the extent it is directly relevant to a service which we are offering you, subject to certain exceptions described in applicable laws. For example, Australian law permits the collection of personal information, including sensitive information, if the collection is required or authorised by or under an Australian law or a court/tribunal order.

## **5. HOW WE USE PERSONAL INFORMATION**

Generally, DCC Ventures will collect personal information in order to provide services which a client has requested. The personal information collected will generally assist us to provide more accurate advice and a better service.

DCC Ventures may also use personal information to help to identify and inform you about potentially beneficial services which we can provide, to invite you to events such as training sessions and networking events, or inform them about developments in intellectual property laws. We aim to provide information and invitations that we consider to be of interest and relevance to you and your business, and will only use your personal information for this purpose if we have collected such information direct from you and if it is material of a type which you would reasonably expect to receive from us. These contacts may take place by telephone, email and other electronic means. If you use our services, or if we have any form of business relationship with you, we will assume you consent to receiving direct marketing material. If you do not wish to be contacted for these purposes, please let us know using the contact details provided below. Alternatively, you may contact us as set out below and request that you receive no further communications of this nature. In addition, all marketing materials will include an “unsubscribe” process.

DCC Ventures may also use personal information for normal business purposes, such as internal accounting and administration, human resources management, risk management, planning, investigating complaints or queries from clients or investors, or in connection with obtaining products and services from other parties.

By voluntarily providing us with information about yourself, you are consenting to our use of that data in the manner described in this policy.

## **6. DISCLOSURE OF PERSONAL INFORMATION**

### **6.1 Disclosure to specialists in connection with professional services**

Depending on the nature of the work which we are undertaking, we may, with our clients' agreement, instruct local or overseas specialists, such as foreign associates (to assist with obtaining advice or, or an application for, an intellectual property right in an overseas jurisdiction), barristers (to assist with a litigation matter), investigators, experts, or other law, patent, or renewal agent. In the course of doing this, we may disclose personal information relating to a client or their representatives, to enable the specialist to provide the necessary service, or to determine whether a conflict of interest exists.

### **6.2 Emergencies and legal requirements**

In some situations, such as emergencies or where required by law, DCC Ventures may be required to assist government agencies, such as law enforcement agencies or the Australian Tax Office, by providing access to certain personal information that we hold.

### **6.3 Other disclosures**

We may share personal information where permitted by law with third parties including our clients, your employer or place of business, or other service providers, including organisations that assist us by providing archival, auditing, professional advisory (including legal, accounting, financial and business consulting), mailhouse, graphic design, printing, delivery, technology, website, research, banking, payment, customer contact, data processing and security services.

Where appropriate, DCC Ventures may share personal information (other than sensitive information and, unless a client has consented, confidential information related to conduct of a professional services matter) with its related bodies corporate, which are listed on the QANTM website ([www.qantmip.com](http://www.qantmip.com)). Notwithstanding the foregoing, any transfer of personal information from Australia to any related body corporate located overseas will comply with the requirements of the Australian Privacy Principles with respect to cross-border disclosures.

### **6.4 Overseas transfers**

a. Your personal information may be transferred overseas or stored overseas for a variety of reasons, including obtaining professional services at a client's request in relation to an overseas jurisdiction, or disclosure to a government agency administering intellectual property in an overseas jurisdiction. Our technology and other service providers may be located overseas or use overseas assets. It is not practical to identify each country to which your personal information may be transferred as part of our normal business operations.

b. If your personal information is sent to a recipient in a country with data protection laws which are substantially similar to the Australian Privacy Principles, and where there are mechanisms available to you to enforce protection of your personal information under that overseas law, we will not be liable for a breach of the Australian Privacy Principles if your personal information is mishandled in that jurisdiction.

c. If your personal information is transferred to a jurisdiction which does not have data protection laws as comprehensive as Australia's, we will take reasonable steps to secure a contractual commitment from the recipient to handle your information in accordance with the Australian Privacy Principles. Alternatively, we may simply seek your consent after providing you with all relevant information about data protection laws in the destination jurisdiction.

d. In some circumstances, the European Union General Data Protection Regulation (GDPR) and its UK equivalent provide additional protection to individuals located in Europe or the United Kingdom as the case may be. Where this is the case, there may be additional rights and remedies available to a person in respect of whom DCC holds personal information.

e. If your personal information is being transferred to us from within a Member State of the European Union or from the United Kingdom and without your consent, we will if requested by the transferring entity commit to standard data protection clauses adopted by the relevant regulatory authority whereby we undertake to handle your personal information in a manner consistent with European or UK laws.

## **7. SECURITY OF PERSONAL INFORMATION**

Irrespective of whether personal information is stored electronically or in hard copy form, DCC Ventures will take reasonable steps to protect the personal information it holds from misuse, interference and loss, and from unauthorised access, modification or disclosure. If we suffer a data breach which has the potential to cause serious harm, we will comply with mandatory data breach notification obligations arising under the Privacy Act.

## **8. ADDITIONAL INFORMATION FOR USERS OF WEBSITE**

a. If an individual visits a DCC ventures website to read, browse or download information, DCC ventures system(s) may record information such as the date and time of the visit to the website, the pages accessed and any information downloaded. This information is used for statistical, reporting and website administration and maintenance purposes only.

b. The information about an individual which may be collected by DCC Ventures through the website includes:

- i. information collected when an individual registers or updates an online profile, which may include personal information such as name and contact details;
- ii. the content of electronic forms submitted via the website, requesting DCC Ventures to provide services or information or take actions;
- iii. any messages or comments submitted to via the website, eg through an email in the 'Contact Us' area;
- iv. information collected when an individual participates in an online survey; and
- v. information an individual provides in seeking employment within DCC Ventures.

c. Like many websites, DCC Ventures websites may use 'cookies', which are small text files that are transferred to a computer's hard drive through a web browser to enable its systems to recognise an individual's browser. Cookies may also be used to record non-personal information such as the date, time or duration of a visit, or the pages accessed, for website administration, statistical and maintenance purposes. The default settings of some browsers allow cookies, but users can easily erase cookies from their hard-drive, block all cookies, or receive a warning before a cookie is stored. Please note that some parts of the DCC Ventures websites may not function fully for users that disallow cookies.

d. DCC Ventures may engage third party services from time to time for website monitoring, reporting and analysis purposes (eg. Google Analytics). Those services may also use cookies and gather anonymous web usage information through DCC Ventures websites

e. Cookies and the anonymous web usage information referred to above will not be used to identify individuals unless required by law, or where the website is accessed via links in an email that DCC Ventures has sent which specifically refers to the fact that clicking on links from the email may be tracked.

f. While DCC Ventures takes great care to protect personal information on its websites, unfortunately no data transmission over the internet can be guaranteed to be 100% secure. Accordingly, DCC Ventures cannot ensure or warrant the security of any information sent to it or received from it online. This is particularly true for information sent via email. DCC Ventures has no way of guaranteeing that information is protected in transit. Once information is received, DCC Ventures will use all reasonable endeavours to ensure its security whilst in DCC Ventures' possession. If an individual is concerned about providing sensitive or confidential information online, please contact DCC Ventures by phone or mail.

g. From time to time, some sections of DCC Ventures websites may protect personal information by requiring an individual to use a password. For an individual's own protection, DCC Ventures requires the password to be kept confidential, and that the password be changed regularly.

h. Please note that in some emergency or law enforcement situations, government agencies may have the authority to review DCC Ventures' web server's records.

i. DCC Ventures websites may contain links to other sites. DCC Ventures is not responsible for the privacy practices or policies of those sites.

## **9. VIDEO SURVEILLANCE**

a. Individuals should be aware that there may be video or other surveillance of lift lobbies and other areas in premises occupied by DCC Ventures. This is predominantly a security precaution and may assist DCC Ventures and others to identify security threats within its premises.

b. DCC Ventures reserves the right to use the surveillance outputs if it reasonably suspects that an individual may be involved in misconduct or illegal activity. In some instances, this may necessarily involve the identification of individuals who are mere bystanders.

## **10. ACCESSING AND UPDATING PERSONAL INFORMATION**

a. If you wish to seek access to, or to request correction of, any of your personal information held by DCC Ventures, please contact us at the address below, and provide as much detail as possible about the particular information sought, in order to help retrieve it

b. We will deal with your request in a reasonable time – usually within 14 days of receipt of your request. We will not charge you for making such a request but we may recover from you our reasonable costs incurred in supplying you with access to this information.

c. In some cases, DCC Ventures may not be required by law to provide access to, or to correct, personal information and if that is the case, DCC Ventures will give you reasons for its decision.

d. If you ask us to correct personal information which you consider to be inaccurate, but we decline on the basis that we consider it to be accurate, we will if requested include a notation on the record regarding your views as to the accuracy of that information.

e. DCC Ventures will take reasonable steps to make sure that personal information it collects, uses and discloses is accurate, complete, relevant and up-to-date. If we are holding personal information which we no longer need and which we are not otherwise required by law to retain, we will destroy or de-identify that information.

## 11. CHANGES TO THIS POLICY

We reserve the right to change and modify this privacy policy at any time without prior notice. Your continued use of our website or services, or further provision of personal information following the posting on our website of changes to these terms will signify your acceptance of these changes. You will always have access to the most recent version of our privacy policy on our website.

## 12. QUESTIONS AND COMPLAINTS

a. If you have a question, complaint or request concerning the privacy of your personal information, please contact us at the following addresses:

**Mail:**

DCC Ventures

(Attention: Head of DCC Ventures)

GPO Box 4387

Melbourne VIC 3001

**Telephone:**

+61 3 9254 2777

**Email:**

mail@dcc-ventures.com

b. In relation to a complaint, 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.