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www.januselectric.com.au



Janus Electric Holdings Limited Level 2, 52 McDougall Street Milton QLD 4064

# Website Privacy Policy - Janus

Janus Electric Holdings Limited, Janus Electric Limited and Janus Energy Pty Ltd ("Janus", "we", "our" or "us") is committed to protecting your privacy and ensuring that your personal information is handled in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs), via the website located at https://www.januselectric.com.au/ ("website").

#### 1. What Personal Information We Collect

- 1.1. The kind of Personal Information that we collect from you will depend on how you use the website. The Personal Information which we collect and hold about you may include:
  - a. Your IP address or other unique identifier for the device used to access a Platform:
  - b. Email address, username, or other unique user identifier;
  - c. Aggregated multi-platform information about Google users who have enabled personalised advertising on their Google accounts (Google Signals Data);
  - d. Browser information:
  - e. "Device" type (computer, mobile phone, tablet or other device);
  - f. Operating system and/or application version;
  - g. Date and time of visit, pages viewed, preceding page views

- h. Use of features or applications on the Platform, such as interactions with connections or groups.
- 1.2. We may also collect this personal information from third parties, including:
  - a. Providers of data-collecting devices, products or systems that you use;
  - b. Contractors performing a service or function on our behalf;
  - c. Regulatory authorities or other Government bodies who make this information lawfully available to us;
  - d. Social media platforms, marketing agencies and suppliers of marketing lists which we lawfully acquire;
  - e. Your employer, contractor or another person who makes a vehicle available to you;
  - f. Any other parties you refer us to or who refer us to you.

### 2. How We Collect Your Information

- 2.1. We collect personal information through the following means:
  - a. Our website (e.g., contact forms, newsletter sign-ups)
  - b. Email and phone communications
  - c. Business transactions and partnerships
  - d. Job applications
  - e. Events, surveys, and promotions
  - f. Cookies and similar technologies

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### 3. Why We Collect Your Information

- 3.1. We collect your personal information to:
  - a. Provide and improve our products and services.
  - b. Respond to your inquiries and provide customer support.
  - c. Process transactions and manage accounts.
  - d. Send updates, marketing, and promotional materials (with your consent).
  - e. Comply with legal and regulatory obligations.
  - f. Recruit and manage employees and contractors.

### 4. Types of Information

- 4.1. The Privacy Act 1998 (Cth) (Privacy Act) defines types of information, including Personal Information and Sensitive Information.
- 4.2. Personal Information means information or an opinion about an identified individual or a reasonably identifiable individual:
  - a. Whether the information or opinion is true or not;
  - b. Whether the information or opinion is recorded in a material form or
- 4.3. If the information 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.
- 4.4. Sensitive Information is defined in the Privacy Act as including information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or

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  - 4.5. Sensitive Information will be used by us only:
    - a. For the primary purpose for which it was obtained;
    - b. For a secondary purpose that is directly related to the primary purpose; and
    - c. With your consent or where required or authorised by law.

### 5. Disclosure of Personal Information

- 5.1. We may disclose your personal information to:
  - a. Our employees, contractors, and service providers
  - b. Regulatory authorities, where required by law
  - c. Third-party partners (e.g., IT providers, marketing agencies)
  - d. Overseas recipients, where necessary for business operations
  - e. If we disclose your information overseas, we will take reasonable steps to ensure it is protected in accordance with this policy.

## 6. Security, Access and Correction

6.1. We store your Personal Information in a way that reasonably protects it from unauthorised access, misuse, modification or disclosure. When we no longer require your Personal Information for the purpose for which we obtained it, we will take reasonable steps to destroy, anonymise or deidentify it. Most of the personal information stored in our client files and records will be retained for a



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- maximum of seven (7) years to fulfil our record-keeping obligations.
- 6.2. We implement industry-standard security measures, including encryption, access controls, and secure data centres, to protect your Personal Information. When deletion is required, we employ secure erasure methods, including digital shredding and the physical destruction of storage media. For digital records, we employ retention periods of 90 days for active data and 7 years for archived data, after which automated purge protocols permanently remove the information using government-approved secure deletion standards.
- 6.3. The Australian Privacy Principles:
  - a. Permit you to obtain access to the Personal Information we hold about you in certain circumstances (Australian Privacy Principle 12);
  - Allow you to correct inaccurate Personal Information subject to certain exceptions (Australian Privacy Principle 13).
  - Where you would like to obtain such access, please contact us in writing on the contact details set out at the bottom of this privacy policy.

### 7. Complaint Procedure

If you have a complaint concerning the manner in which we maintain the privacy of your Personal Information, please contact us using the contact details set out at the bottom of this policy. Our CEO will review all complaints, and we may request additional 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.

### 8. Documentation and Response Timeline

8.1. We will acknowledge receipt of your complaint within 5 business days and provide you with a reference number. Our privacy team will investigate your complaint and maintain detailed records of all communications and findings. We aim to resolve all privacy complaints within 10 business days. If additional time is required, we will notify you in writing. All complaint documentation will be retained for 3 months following resolution. If the matter requires escalation, our Chief Financial Officer and Company Secretary will personally review your case within 5 business days of the escalation request.

### 9. Changes to this Policy

We may update this Privacy Policy from time to time. The latest version will always be available on our website. We encourage you to review it periodically.

### 10. Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy, please contact:

Janus Electric Holdings Limited Email: <a href="mailto:info@januselectric.com.au">info@januselectric.com.au</a>.

Phone: 1300 552 687

Website: www.januselectric.com.au

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