

THE PSQ GROUP PRIVACY STATEMENT

Last Updated: 27/10/2021

The PSQ Group is committed to recognizing and respecting your privacy. This Privacy Statement details how The PSQ Group collects, holds, uses, and discloses personal information provided by visitors to our website and individuals external to The PSQ Group. It sets out rights in relation to personal information and how you can contact us. In this Privacy Statement, references to 'The PSQ Group', 'we' or 'us' means The PSQ Group (ABN 32 165 953 104) and all related or subsidiary companies both in and out of Australia.

The contents of this Privacy Statement and the disclaimer may be updated from time to time. This Privacy Statement was last updated on 27/10/2021. By dealing with The PSQ Group, you acknowledge that you have understood and accept the contents of this Privacy Statement including any changes made to these documents by The PSQ Group from time to time.

Who does this Privacy Statement apply to?

It applies to our website visitors and others external to The PSQ Group (e.g. customers and investors).

This Privacy Statement applies to:

- Visitors to and users of our website;
- Visitors to our offices or sites;
- Potential employees;
- Investors or prospective investors;
- Parties with whom The PSQ Group has business relationships;
- Joint venture participants;
- Customers; and
- Stakeholders.

What is personal information?

Personal information is information or an opinion about you as an individual that identifies you or from which your identity can be ascertained.

What is sensitive Information?

Sensitive information includes data about criminal records, health, religion, political affiliations and other special categories of information. Sensitive information may be collected from potential employees as part of recruitment processes or as part of stakeholder engagement on environmental and social impact assessments.

Sensitive information is information that discloses a person's:

- Racial or ethnic origin
- Political opinions
- Membership or political association
- Religious beliefs or affiliations
- Philosophical beliefs
- Membership of a professional or trade association
- Membership of a trade union
- Sexual preferences or practices
- Criminal record
- Health, genetics or biometrics.

Types of information collected

We may receive information about you whenever you interact with us, including via our website, emails, letters, applications, calls, enquiries about our products, our business or an investment in The PSQ Group, or when you respond to surveys or other invitations to engage with The PSQ Group, etc. We may also receive information about you from third parties (for example, public registers, credit reporting agencies).

Website Interaction Information

When visiting The PSQ Group's website, The PSQ Group keeps a record of your visit. The following information may be collected for statistical purposes and may be used by The PSQ Group to help improve the website:

- Your Internet Protocol (IP) address.
- The previous site you visited.
- Your type of browser and operating system.

- The pages you access and the documents you download.

The PSQ Group will not attempt to identify users or their browsing activities, however, government agencies may be entitled to inspect such records in the event of an investigation.

During your visit to our website, we may also ask you to provide us with other information. For example, if you wish to request information from us, you may provide your email address and information about your interests.

Other Information

When you interact with us via other channels, we may also collect the following information about you:

- Your name, title, role, biographical and contact details
- Current employment and position
- Information concerning your potential employment by The PSQ Group
- Your photograph
- Information required to facilitate site visits (including to provide personal protective equipment or meet dietary or cultural requirements)
- Information concerning any investments in The PSQ Group
- Your responses (including to competitions) on our community's social media platforms
- Survey and social impact assessment information
- Information collected in undertaking due diligence activities
- Information provided by you about incidents, complaints or grievances
- Other information relevant to your relationship with us

For potential employees we may collect date of birth, gender, tax file number, bank account details and may also need to collect information from third parties such as referees or publicly available information.

In some limited cases, we may also make travel arrangements for third parties requiring additional travel related information. The personal information required will be discussed with you at the time of collection.

We may also collect, use or disclose personal information to regulatory or governmental agencies in the event of an investigation in order to meet our on-going regulatory and compliance obligations. Where permitted or authorised by law, we use systems designed to flag suspicions of potentially unlawful or fraudulent activity.

We will only collect the above personal information to the extent permitted by law.

Third party information you provide

Occasionally, you may give us personal information about other people - for example your referees or authorised representatives. If so, you must tell those individuals that you are giving their personal information to us and that this Privacy Statement governs the collection, use, disclosure and storage of that information.

Why we collect, hold, use and disclose personal information

We use your information for our legitimate business interests, in order to comply with legal obligations and in connection with investigations or claims. Sometimes, we will ask for your express consent to use certain types of personal information and, where we do so, you may have the right to withdraw that consent.

The PSQ Group may collect, use and store this personal information for the following legitimate business interests of The PSQ Group:

- Administer databases (including our contracts database)
- Establish and manage good commercial or stakeholder relations with you or the organisation with which you are associated
- Engage in business sales or acquisitions or joint ventures
- Receive and provide services (including maintaining records of business relationships)
- Arrange travel
- Investigate or respond to any incidents, complaints or grievances
- To authenticate your access to and protect and maintain the security and safety of The PSQ Group owned or operated premises, sites, systems and assets and people
- Helping us to learn more about customers, stakeholders and products, services or information you receive or may be interested in receiving
- Give you the option of receiving our publications
- Invite you to The PSQ Group functions
- Taking steps to improve our products, services and stakeholder communication and our use of technology
- Billing and accounts
- Publishing information sources used in advertising and mailing lists for public relations

We may also use your information in order to comply with the law or enforce the law or cooperate with investigations carried out by the police, government or regulators, or for the establishment, exercise or defence of a legal or equitable claim.

We may sometimes ask you for your consent to use personal information for other purposes. If we do, we will ask for your consent explicitly and you may be entitled to withdraw that consent.

Direct marketing and newsletters

The PSQ Group may from time to time send marketing, newsletters or other informative communications to you in accordance with your instructions, with your consent, or as otherwise permitted by law. If you do not wish to continue to receive this information, please follow the unsubscribe instructions in the marketing communication.

Cookies

The website may use tracking technologies called 'cookies, including' to monitor the pages accessed by browsers on our website. Third party cookies may be placed by contracted service providers on The PSQ Group's website and The PSQ Group may share anonymous aggregate information from the website with contracted service providers. You may set your browser to refuse cookies if you wish, although this may affect your browsing experience.

Cookies are small text files which are stored in memory or on your hard drive for record keeping purposes and are used to enhance The PSQ Group's website.

Do we disclose your personal information to anyone?

Unless you specify otherwise, we may disclose your information to the following groups, in each case in accordance with laws on data transfers:

- Companies in the The PSQ Group (or to any prospective purchaser of all or part of the group or its assets), to third parties we work with or in connection with investigations, or for legal or regulatory reasons
- Companies in the The PSQ Group and to third parties who provide goods and services to the The PSQ Group, or carry out activities on behalf of, the The PSQ Group for the purposes set out in the section titled “**Why we collect hold, use and disclose personal information**”, including external consultants and professional advisers such as lawyers, auditors and accountants, technical support functions and IT consultants carrying out testing and development work on our business technology systems;
- Potential buyers of all or part of the The PSQ Group’s business or its assets; and
- Tax, audit, or other authorities, when we believe that the law or other regulation requires us to share this data (for example, because of a request by a tax authority, as part of our statutory obligations, or to a court in response to a subpoena).

Security

The security of your personal information is important to us. The PSQ Group takes such steps as are reasonable in the circumstances to protect personal information from loss, misuse, interferences, unauthorised access, modification or disclosure. Please notify us immediately if you become aware of any breach of security.

The PSQ Group employs a number of systems to protect your personal information, including:

- External and internal premises security measures designed to ensure that your information is not capable of being seen or modified by unauthorised persons
- Restricted access to personal information
- Maintaining technology products designed to prevent unauthorised computer access
- Regular review and testing of our technology in order to improve the level of security
- Implementation of mandatory requirements in relation to use of The PSQ Group’s IT Systems

It is important to be aware that email is generally not a secure way to communicate. Personal information contained within emails sent to and from email addresses external to The PSQ Group may not be secure.

Retention

The PSQ Group will retain your data in line with good record-keeping practices. The relevant time period for retention of your information is determined in accordance with relevant legal and regulatory requirements, the purpose for which your personal information was collected, limitation periods for any claims that might arise and industry practice guidelines.

The PSQ Group's approach to retention and disposal of information groups 'like information' together in order to apply The PSQ Group's retention rules according to legal and operational requirements. This policy is based on best practice, the Australian Records Retention Manual and legal requirements. After the requisite time has passed, we will take such steps as are reasonable in the circumstances to attend to the destruction, de-identification or deletion of your personal information.

Links to other websites and social media

Other websites and social media may be accessible via hyperlinks from the The PSQ Group website. The PSQ Group is not responsible for the levels of data protection afforded to you by these other websites and social media platforms. We encourage you to review the separate privacy guidance for these websites and platforms before using them.

The PSQ Group may provide links to other websites and social media features (e.g. so that you can interact with The PSQ Group on social media websites). As these are third party websites and features, The PSQ Group cannot be responsible for your use of them.

Your use of other websites and social media features could lead to the collection or sharing of information about you.

Those websites and social media platforms are not subject to this Privacy Statement. The PSQ Group encourages you to review the privacy guidance and settings of each website and social media platform with which you interact to assess whether the guidance and settings are satisfactory to you in relation to the collection, use and disclosure of information by those websites and platforms.

Individual rights

The PSQ Group complies with applicable laws which grant individuals certain rights in respect of their personal information (e.g. rights to access, correct, delete, withdraw consent, complain etc.). You can contact our Privacy Officer to exercise your rights.

The rights that individuals have in respect of their personal information vary from country to country. We set out below a list of the key rights you should be aware of. Some rights will not apply in some jurisdictions and there may also be limitations on the ways in which rights can be exercised.

Right to access

You may request access to or correction of any of the personal information The PSQ Group holds about you. Your entitlement to access your personal information will be subject to applicable laws.

Your request for access will be handled as soon as reasonably practicable. We will comply with applicable laws and, in any event, endeavour to process your request within 30 days after receiving the request. Some requests may take longer to process depending upon the nature of the personal information being sought.

Right to correction

The PSQ Group takes reasonable steps to ensure that information is up to date and complete. However, if you believe the information we hold about you is inaccurate or incomplete, you may request that we correct it.

Right to object to, or restrict use of, data

You may write to us to object to us using your personal information – either generally or for specific purposes.

Right of deletion

In some circumstances, you may be able to request that The PSQ Group erase some or all of the personal information we hold about you.

Right to data portability

If you have made personal information available to us for automated processing and have provided your explicit consent for that processing (or that processing is required for the purposes of a contract between The PSQ Group and you), you may be able to ask us to transfer that data to you or a third party in a machine-readable format.

Right to withdraw consent

If you have given us explicit consent for the use of your personal information, you may later withdraw that consent (although this will not affect the lawfulness of our previous use of your information).

Right to make a complaint

If you believe that The PSQ Group has not protected your personal information as set out in this Privacy Statement or has breached your privacy rights in any way, you may lodge a complaint with us by emailing info@psqgroup.com.au.

On receipt of your complaint, The PSQ Group will:

- Provide a written acknowledgement or receipt
- Promptly investigate the complaint and let you know if further information is required to investigate it
- Endeavour to provide you with a substantive written response within 30 days