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# PRIVACY POLICY

ISO 27001:2022 Controlled Document  
Prepared for JEM Computer Systems Pty Ltd | May 2025

This Privacy Policy applies to all personal information collected by JEM Computer Systems Pty Ltd.

# Privacy Policy

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JEM Computer Systems Pty Ltd ACN 077 296 283 (**we, us, our**) is an information and technology company that provides cloud usage, storage, monitoring, auditing, procurement, installation, consulting and general IT support services to our clients.

We are bound by the Australia Privacy Principles (**APPs**) in the *Privacy Act 1988* (Cth) (**Privacy Act**). We understand the importance of, and are committed to, protecting your personal information. This Privacy Policy explains how we manage your personal information (that is, information or an opinion about you, whether true or not, which identifies you or from which your identity is reasonably identifiable), including our obligations and your rights in respect of our dealings with your personal information.

We have taken the additional step of being an ISO accredited organisation, and offer ISO Controlled Environments to our clients, where appropriate.

Please take a moment to read our Privacy Policy below, as it describes what happens to your personal information (that is, information or an opinion about you, whether true or not, which identifies you or from which your identity is reasonably identifiable) that is collected via our website at <https://www.jem.com.au/> (the **Website**), through the provision of our services to you, or otherwise.

## 1. How we collect your personal information

We will collect and hold your personal information in a fair and lawful manner, and not in an intrusive way. Where it is reasonably practical to do so, we will collect your personal information directly from you. We may collect the personal information you directly give us through some of the following means:

- (a) when you make an inquiry or order in relation to goods or services through the website;
- (b) in administering and performing any contracts with service providers;
- (c) when you contact us via telephone or facsimile;
- (d) from correspondence (whether in writing or electronically);
- (e) through any mobile applications provided by our organisation;
- (f) while conducting customer satisfaction and market research surveys;
- (g) when administering any of our services; and
- (h) as otherwise required to manage our business.

However, in certain cases we may collect personal information from publicly available sources and third parties, such as suppliers, recruitment agencies, contractors, our clients and business partners.

If we collect personal information about you from a third party we will, where appropriate, request that the third party inform you that we are holding such information, how we will use and disclose it, and that you may contact us to gain access to and correct and update the information.

## **2. Types of personal information we collect**

The type of personal information we may collect can include (but is not limited to), your name, postal address, email address, phone numbers, credit information, billing information and, if applicable, employment information.

We only collect sensitive information about you with your consent, or otherwise in accordance with the Privacy Act.

Where you do not wish to provide us with your personal information, we may not be able to provide you with requested goods or services.

## **3. Our purposes for handling your personal information**

As a general rule, we only process personal information for purposes that would be considered relevant and reasonable in the circumstances.

We collect, hold, use and disclose personal information to:

- (a) offer and provide you with our goods and services;
- (b) manage and administer those goods and services, including account keeping procedures;
- (c) communicate with you, including (but not limited to), emailing you tax invoices, dispatch and tracking information, returns and exchange authorisations;
- (d) comply with our legal and regulatory obligations; and
- (e) otherwise to manage our business.

We will not use or disclose your personal information for any other purpose unless you have consented to that use or disclosure.

We may disclose personal information between our organisations or to third parties such as our suppliers, organisations that provide us with technical and support services, or our professional advisors, where permitted by the Privacy Act. If we disclose information to a third party, we generally require that the third party protect your information to the same extent that we do.

## **4. Protection of personal information**

We will hold personal information as either secure physical records, electronically on our intranet system, in cloud storage, and in some cases, records on third party servers, which may be located overseas.

We maintain appropriate physical, procedural and technical security for our offices and information storage facilities so as to prevent any loss, misuse, unauthorised access, disclosure, or modification of personal information. This also applies to disposal of personal information.

We further protect personal information by restricting access to personal information to only those who need access to the personal information do their job. Physical, electronic and managerial procedures have been employed to safeguard the security and integrity of your personal information.

We will destroy or de-identify personal information once it is no longer needed for a valid purpose or required to be kept by law.

In our ISO Controlled Environments, that is, within our own office and by using our JEM servers, we have maintained our ISO accreditation, adding extra security protection for our clients' data. This means that we implement additional security processes such as:

- (a) Using only one remote application, with all sessions recorded for quality assurance and security reasons;
- (b) Each member of our team who may access your information has an identifiable account, so that we know who is accessing what information; and
- (c) We will not give access to any unauthorised team member without your prior consent.

This accreditation is audited by an external provider every year to ensure our compliance with international standards.

## **5. Direct marketing**

Like most businesses, marketing is important to our continued success. We believe we have a unique range of products and services that we provide to customers at a high standard. We therefore like to stay in touch with customers and let them know about new opportunities. We may provide you with information about new products, services and promotions either from us, or from third parties which may be of interest to you.

We will not disclose your personal information to third parties for marketing purposes without your consent.

You may opt out at any time if you no longer wish to receive commercial messages from us. You can make this request by contacting our Privacy Officer.

## **6. Cookies**

A cookie is a small text file stored in your computer's memory or on your hard disk for a pre-defined period of time. We use cookies to identify specific machines in order to collect aggregate information on how visitors are experiencing the Website. This information will help to better adapt the Website to suit personal requirements. While cookies allow a computer to be identified, they do not permit any reference to a specific individual. For information on cookie settings of your internet browser, please refer to your browser's manual.

## **7. Links to Third Party sites and Web Applications**

The Website contains links to third party websites that are not controlled, administered or maintained by us. When you access these websites, we strongly encourage you to read the respective privacy statements contained on these websites as their privacy policies may differ from ours.

Further, in the course of us providing our services to you, we may employ certain applications, such as remote login services, to both retrieve information about your computer system and allow us to remotely control your workstation and/or server. Prior to us performing our services, we will advise you

of any third party applications we intend to employ so that you may consult the application's respective privacy statement.

At all material times we do not accept liability for any misuse of personal information collected by third party websites or applications.

#### **8. Accessing and correcting your personal information**

You may contact our Privacy Officer to request access to the personal information that we hold about you and/or to make corrections to that information, at any time. On the rare occasions when we refuse access, we will provide you with a written notice stating our reasons for refusing access. We may seek to recover from you reasonable costs incurred for providing you with access to any of the personal information about you held by us.

We are not obliged to correct any of your personal information if it does not agree that it requires correction and may refuse to do so. If we refuse a correction request, we will provide you with a written notice stating our reasons for refusing.

We will respond to all requests for access to or correction of personal information within a reasonable time.

#### **9. Overseas transfers of personal information**

As at the date of this Privacy Policy, we are not likely to disclose your personal information to overseas recipients.

If in future we do propose to disclose personal information overseas, we will do so in compliance with the requirements of the Privacy Act. We will, where practicable, advise you of the countries in which any overseas recipients are likely to be located.

If you do not want us to disclose your information to overseas recipients, please let us know.

#### **10. Our Response to Data Breaches**

In the unlikely event that any personal information collected by us is the subject of any unauthorised use, access or disclosure, we will follow the processes and procedures specified within our Data Breach Response Plan (**Plan**).

The purpose of the Plan is to set out procedures and clear lines of authority for us to follow in the event that we experience a data breach or suspect that a data breach has occurred.

The Plan is intended to contain, assess and respond to data breaches as quickly as possible and to mitigate potential harm to affected parties.

#### **11. Resolving personal information concerns**

If you have any questions, concerns or complaints about this Privacy Policy, or how we handle your personal information, please contact our Operations Manager:

**Operations Manager - JEM Computers Pty Ltd**

Unit 32, 9 Salisbury Road  
Castle Hill NSW 2154

Telephone: 1300 536 266 (1300 JEM COM)

Email: [operations@jem.com.au](mailto:operations@jem.com.au)

We take all complaints seriously and will respond to your complaint within a reasonable period.

If you are dissatisfied with the handling of your complaint, you may contact the Office of the Australian Information Commissioner:

**Office of the Australian Information Commissioner**

GPO Box 5218

Sydney NSW 2001

Telephone: 1300 363 992

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

## **12. Changes**

We reserve the right to change the terms of this Privacy Policy from time to time, without notice to you. An up-to-date copy of our Privacy Policy is available on our Website.

The last update to this document was in May 2025.