



Privacy Policy

Last revised July 10th 2025

Unicard Systems Pty Ltd ("Unicard Systems", "Unicard", "we" or "us") takes your privacy seriously.

This Privacy Policy describes how we manage personal information in accordance with the **Australian Privacy Act 1988 (Cth)** and the **Australian Privacy Principles (APPs)**, as well as the **General Data Protection Regulation (EU) 2016/679 (GDPR)**, and the **California Consumer Privacy Act (CCPA)** and **California Privacy Rights Act (CPRA)**. It outlines the kinds of personal information we collect, the purposes for which we collect it, and how we hold, use, disclose, and protect that information.

By using our products and services (e.g. identityONE, CaptureMe, the identityONE mobile app, and including our website), or by providing your personal information to us, you agree to the terms of this Privacy Policy.

We may update this Privacy Policy to reflect changes in law or our practices. The latest version will always be available on our website. www.unicard.com.au. We encourage you to check it periodically.

APPLICATION

This policy applies to all employees, contractors, and vendors while doing business with Unicard Systems Pty Ltd and others who have access to:

- Personal information of Australian individuals under the **Australian Privacy Act 1988**;
 - EU and EEA data subjects under the **GDPR**;
 - California residents under the **CCPA/CPRA**.
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POLICY

Unicard is committed to protecting the security, confidentiality, and privacy of personal information in accordance with applicable data protection laws.

We collect, hold, and process personal data only when there is a lawful basis to do so, and we implement technical, physical, and administrative safeguards to protect that information. This includes:

- **Australian Privacy Principles (APPs)** compliance;
- **GDPR** Articles 5-32;
- **CCPA/CPRA** Sections 1798.100–1798.199.100.

All Unicard staff and contractors share responsibility for safeguarding the personal data they access.

When providing products and services, Unicard may process personal information as a data controller or processor. This includes activities such as storage, access, creation, use, and disclosure, governed by:

- Internal data protection policies;
 - Secure processing procedures;
 - Privacy-by-design and privacy impact assessments.
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WHAT PERSONAL INFORMATION DO WE COLLECT?

Depending on how you interact with us, we may collect:

- **Identifying information:** name, date of birth
- **Contact details:** address, email, phone
- **Financial details:** bank/payment information

- **Employee information:** safety/emergency details, records of personal use on Unicard systems
- **Login credentials:** usernames and passwords
- **Organisational info:** your role and employer details
- **Usage data:** how you use our services
- **Communications records:** calls, emails, chats
- **Biometric data:** facial recognition, images
- **Other identifying or sensitive information:** with your consent or as required by law

If you choose not to provide required information, we may not be able to offer some services.

LOG DATA, DEVICE AND LOCATION INFORMATION

We may collect:

- Device model, OS, phone network
- Server logs: IP address, browser, access date/time
- Location data (e.g. GPS)
- Cookie data for site functionality and analytics

Our websites may use services such as **Google Analytics**. For more information, visit Google's Privacy Policy.

SENSITIVE DATA

With your **explicit consent**, or as required by law, we may collect sensitive information (e.g. racial/ethnic origin, criminal records). We comply with **APP 3.3**, **GDPR Article 9**, and **CPRA Section 1798.140(ae)**.

CHILDREN'S PRIVACY

Our services are not intended for individuals under 16. If we discover data collected from a child under 16, we will delete it. Contact us immediately if you believe this has occurred.

SAAS CUSTOMERS

When providing access to hosted environments (e.g. identityONE), we do not collect or use personal information stored there unless required for support, maintenance, or legal purposes.

You are responsible for ensuring consent is obtained from individuals whose data you process using our platforms.

HOW DO WE COLLECT PERSONAL INFORMATION?

We collect personal information when you:

- Order products/services
- Use our websites or platforms
- Visit our offices/sites
- Communicate with us
- Submit forms or feedback
- Apply for a job
- Are referred to us by a third party

We may also collect from public or online sources and information providers. If you give us personal information about someone else, you must have their permission to do so.

COOKIES

We use cookies to improve website and service functionality. You may disable cookies via your browser, but some features may not work correctly.

HOW DO WE USE PERSONAL INFORMATION?

We use your information to:

- Verify identity
- Deliver services

- Answer enquiries
 - Meet legal obligations
 - Improve products and services
 - Monitor and enhance user experience
 - Manage business relationships
 - Conduct research and analysis
 - Provide marketing (with opt-out)
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DIRECT MARKETING & RESEARCH

We may use your data for direct marketing in accordance with **APP 7, GDPR Article 6(1)(f), and CPRA Section 1798.120**. You can opt out at any time using the unsubscribe link or by contacting us.

DE-IDENTIFICATION & AGGREGATION

We may de-identify or aggregate data to use for business purposes, including service improvements or marketing.

WHO DO WE DISCLOSE PERSONAL INFORMATION TO?

We may disclose your information to:

- Authorised representatives
 - Business partners, contractors, advisors
 - Government authorities or regulators
 - Payment processors or financial institutions
 - Third parties as authorised or required by law
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CROSS-BORDER DISCLOSURE

We comply with **APP 8**, **GDPR Chapter V**, and **CCPA Section 1798.185** for cross-border transfers. We ensure adequate protection or obtain your consent before transferring your personal data overseas.

SECURITY AND STORAGE OF PERSONAL INFORMATION

We take reasonable steps to ensure your data is secure and up to date, using:

- Physical access restrictions
- Password protection, firewalls, encryption
- Staff training and access control
- Intrusion detection and monitoring

Personal data is stored in Australia or in third-party systems only with appropriate contractual safeguards. Data is retained only as long as required and securely destroyed or de-identified when no longer needed (per **APP 11.2**).

ACCESS, CORRECTION, PORTABILITY, AND RESTRICTION

You have the right to:

- Access your data
- Correct inaccurate or outdated information
- Request transfer of your data to another entity
- Request restricted use in certain circumstances

Submit requests in writing (see contact details). We may need to verify your identity. We will respond within a reasonable time, and explain any refusal or applicable fees.

ERASURE OF PERSONAL INFORMATION

You may request erasure of your personal information when:

- It's no longer needed for the original purpose;
- You withdraw consent; or

- It was collected unlawfully.

We may refuse deletion where retention is required by law. Requests should be made in writing.

COMPLAINTS

If you have concerns or complaints about our handling of your personal information, contact us in writing with your contact details and the nature of your complaint. We will respond promptly.

If you are not satisfied with our response, you can contact your relevant privacy authority:

- **Australia:** Office of the Australian Information Commissioner (OAIC) – [OAIC](#)
 - **UK:** Information Commissioner's Office (ICO) – [Home](#)
 - **California:** State of California Department of Justice – [California Consumer Privacy Act \(CCPA\)](#)
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CONTACT US

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Our UK Representative (under Article 27 UK GDPR):

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