



Privacy Policy Statement

Montane Protective Security (ABN 21 640 792 296)

References to “Montane Protective Security”, “MPS”, “we”, “us” and “our” in this Privacy Policy refer to the business entity, Montane Protective Security.

Introduction

1. Montane Protective Security is committed to managing personal information in an open, transparent and secure way. Where the Privacy Act 1988 (Cth) applies to us, we comply with the Australian Privacy Principles (APPs), which regulate the collection, use, disclosure, quality, security, access to and correction of personal information. Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable.

Why do we collect personal information?

2. We collect personal information where it is reasonably necessary for, or directly related to, our business activities and functions, including to provide protective security, advisory, training, consulting, stakeholder engagement, proposal, contracting and client support services; to manage suppliers, contractors and business relationships; to operate our website and communications; and to meet legal, regulatory, insurance, accounting and administrative obligations.

What personal information do we collect?

3. The types of personal information we may collect include your name, role, organisation, contact details, billing or payment information, professional background, security-related information relevant to an engagement, communications with us, records of meetings or correspondence, website usage information, device and browser information, internet protocol address, and any feedback, enquiries or information you choose to provide. In limited circumstances, and only where permitted by law, we may collect sensitive information such as information about professional memberships, security clearances, identity documents, health and safety matters, or other information required for a specific engagement.

4. We collect personal information directly from you where practicable, including through online forms, email, telephone, video conference, meetings, interviews, proposals, contracts, site engagements and other business interactions. We may also collect personal information from third parties where it is lawful and reasonable to do so,

including from your employer or organisation, referees, service providers, publicly available sources, government or regulatory sources, and clients who provide information relevant to a security or advisory engagement.

5. Sometimes our activities require us to collect sensitive information. For more details, see the section 'Sensitive information is subject to greater restrictions', below.

6. If you choose not to provide the information we need to fulfil your request for a specific product or service or to participate in MPS based activities, we may not be able to provide you with the requested product or service or may not be able to allow you to participate in our activities.

6A. Where lawful and practicable, you may deal with us anonymously or by using a pseudonym. However, this may not be possible where we need to verify your identity, provide a requested service, enter into or perform a contract, conduct security-related work, or comply with legal or regulatory obligations.

How might we use personal information?

7. MPS may use and disclose personal information for the purpose for which it was collected, for related secondary purposes that would be reasonably expected, where you have consented, or where otherwise required or authorised by law. We do not use or disclose personal information for a materially unrelated purpose unless permitted by the Privacy Act.

8. Generally, MPS uses your personal information for the following purposes:

- a. To provide you with our products and services.
- b. To respond to your queries or feedback.
- c. To facilitate and enable our work in general.
- d. To send you any communications or publications in which we think you might be interested, or which you have requested.
- e. To let you know about developments in our procedures, products, services, activities and programs that might be useful to you.
- f. To comply with legal, regulatory, contractual, insurance, audit, record-keeping, taxation, workplace health and safety, security and dispute-resolution obligations.
- g. To protect our lawful interests, manage risk, investigate incidents, maintain business continuity, and support protective security, assurance and governance activities.

Direct marketing and communications

8A. We may use your contact details to send business updates, insights, publications, invitations or information about our services where permitted by law. You may opt out of receiving marketing communications at any time by contacting us or using any unsubscribe function provided. We will not use sensitive information for direct marketing without your consent.

Disclosure of personal information to other parties

9. Montane Protective Security may disclose personal information to employees, contractors, professional advisers, insurers, auditors, technology and cloud service providers, payment and administration providers, clients, partner organisations, government agencies, regulators, law enforcement bodies, dispute-resolution bodies and other parties where reasonably necessary for our functions or permitted by law. We require service providers that handle personal information on our behalf to take reasonable steps to protect it and use it only for authorised purposes.

10. We may also disclose your personal information if it is required or authorised by law or where disclosure is necessary to prevent a threat to life, health or safety.

11. We do not sell or license your personal information to third parties.

Sensitive information is subject to greater restrictions

12. Sensitive information includes information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information, genetic information, biometric information or biometric templates, where that information is also personal information.

13. We will only collect sensitive information where you consent and the information is reasonably necessary for our functions or activities, or where collection is otherwise required or authorised by law. We will use or disclose sensitive information only for the purpose for which it was collected, for directly related secondary purposes that would be reasonably expected, with your consent, or where otherwise permitted by the Privacy Act.

Security and management of personal information

14. MPS will take reasonable steps, including technical and organisational measures, to protect personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure. These measures may include access controls, secure systems, staff awareness, supplier due diligence, data minimisation, secure disposal, and appropriate record-keeping practices. If we no longer require

personal information for any lawful purpose, we will take reasonable steps to destroy or de-identify it.

Notifiable data breaches

14A. If we become aware of a suspected or actual data breach, we will assess the incident and respond in accordance with the Privacy Act and the Notifiable Data Breaches scheme where applicable. Where required, we will notify affected individuals and the Office of the Australian Information Commissioner of an eligible data breach and provide information about steps individuals may take in response.

Links from our website to other websites

15. Our website may contain links to third party websites. We do not operate these websites and therefore are not responsible for the collection or handling of personal information by the operators of these websites.

Accessing the information we hold about you

16. You may request access to personal information we hold about you by contacting us in writing. We may ask you to verify your identity and specify the information requested. We will respond within a reasonable period and may refuse access where permitted by the Privacy Act, including where access would unreasonably affect another person's privacy, prejudice security or legal matters, or be otherwise unlawful. If we refuse access, we will generally provide written reasons and explain available complaint mechanisms. We may charge a reasonable fee for providing access, but not for making the request.

Updating your personal information

17. We take reasonable steps to ensure the personal information we hold is accurate, up-to-date, complete, relevant and not misleading. You may ask us to correct personal information we hold about you. If we refuse a correction request, we will generally provide written reasons and, where required, take reasonable steps to associate a statement with the information noting that you consider it inaccurate, out-of-date, incomplete, irrelevant or misleading.

Sending information overseas

18. We may disclose personal information to overseas recipients where reasonably necessary for our business activities, including where cloud, technology, professional or client-related services involve overseas storage, access or support. Before disclosing personal information overseas, we will take reasonable steps required by the APPs, unless an exception applies, including by seeking your consent, ensuring appropriate contractual or other safeguards, or relying on another lawful basis under the Privacy Act.

Automated decision-making

19. We do not currently arrange for a computer program to use personal information to make decisions that could reasonably be expected to significantly affect an individual's rights or interests. If this changes, we will update this Privacy Policy to explain the kinds of personal information used and the kinds of decisions made, in accordance with APP 1 automated decision-making transparency requirements.

Updates to this Policy

20. This Privacy Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and the changing business environment.

Contact us

21. Any enquiries, access or correction requests, complaints, or correspondence in relation to this Privacy Policy should be sent to us via email at: operations@montaneps.com.au. We will endeavour to respond promptly. If you are not satisfied with our response to a privacy complaint, you may be able to contact the Office of the Australian Information Commissioner.

Date: 25 August 2026