

Document Details
<p><b>Privacy Policy</b></p> <p><b>Document Number – ELSA-COR-POL-009</b></p> <p><b>Document Type – Procedure</b></p> <p><b>Circulation Restriction – Unrestricted</b></p> <p><b>Security Classification – Official</b></p>

Summary
<p>The purpose of the Privacy Policy is to describe how Elbit Systems of Australia Pty Ltd will treat the personal information collected from individuals through its business dealings.</p>

Revision History				
This document will be re-issued in full for each release (i.e. change pages will not be issued). Document update approval will be in accordance with ELSA-QUA-PRO-004.				
Rev	Rev Date	Description	Developed by	Approved by
A	21/05/2018	Initial	Neil Killick	Shirley Yonatan
B	28/07/2021	Minor Updates / New Template	Neil Killick	Shirley Yonatan

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**1 GENERAL**

**1.1 Introduction**

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- 1.1.1 Elbit Systems of Australia Pty Ltd (“ELSA”, “we”, “our” or “us”) is committed to providing quality services and this Privacy Policy (“Policy”) describes how we will treat the personal information collected directly from individuals (“you”).
- 1.1.2 This Policy uses the definition of "personal information" which is provided in the *Privacy Act 1988 (Cth)* (“Act”).
- 1.1.3 Through ELSA’s business dealings with you, the use of ELSA’s website, any applicable social media websites and pages and other communications, we may collect personal information about you. This Policy explains how we collect, hold, use or disclose personal information, how you can access and correct your personal information and what to do if you have a complaint. This Policy complies with the requirements of the Act, including the Australian Privacy Principles (APPs), to the extent the APPs apply, and any other applicable privacy laws in Australia.

## 2 REFERENCE DOCUMENTS, ACRONYMS AND ABBREVIATIONS

### 2.1 Reference Documents

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2.1.1 Reference documents used in the Policy are listed in Table 2-1.

**Table 2-1 Referenced Documents**

Document No.	Title
ELSA-QUA-PRO-004	Documentation Structure and Control
	<i>Privacy Act 1988 (Cth)</i>
	Australian Privacy Principles

### 2.2 Acronyms and Abbreviations

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2.2.1 Acronyms and abbreviations used in the Policy are listed in Table 2-2.

**Table 2-2 Acronyms and Abbreviations**

Acronym	Meaning
ELSA	Elbit Systems of Australia Pty Ltd
APP	Australian Privacy Principles
URL	Uniform Resource Locator, website registered to ELSA
OAIC	Office of the Australian Information Commissioner
IP	Internet Protocol

### **3 COLLECTING, HOLDING, USING AND DISCLOSING PERSONAL INFORMATION**

#### **3.1 What kinds of personal information does ELSA collect and hold?**

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3.1.1 The kinds of personal information that ELSA collects and holds include name, address, email address, phone number, job title and position and other information that you provide to us that is relevant to our functions and activities. ELSA will not seek to collect data beyond what is needed to provide our product or service to you or otherwise interact with you in accordance with your expectations.

#### **3.2 How is personal information collected?**

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3.2.1 ELSA usually collects personal information directly from you.

3.2.2 In some instances, ELSA may collect personal information about you from third parties, such as recruitment agencies or from your employer where we have a business relationship with your employer and your contact details are required in order for us to correspond with our business partner.

3.2.3 ELSA may collect personal information from third parties, such as suppliers of goods and services, including, where you have made inquiries about our goods or services to such third parties.

3.2.4 ELSA may collect personal information when you communicate with us, such as when you:

- a. make inquiries about ELSA, or our services or contact ELSA for any other reason so that ELSA can process, deal with and respond to your queries or other issues including any complaints;
- b. provide your details to act as the contact person for an organisation that we supply goods and services to or an organisation that we receive the goods and services from;
- c. contact, register with, post to, like or follow any of ELSA's social media websites, pages, forums or blogs;
- d. use the ELSA website;
- e. subscribe to any of ELSA services;
- f. register for and attend events;
- g. make applications for prospective employment or contracting opportunities with ELSA or become an employee or contractor; or
- h. subscribe to a newsletter, fill out a form or survey, enter or participate in any competitions or promotions.

3.2.5 Any area where personal information is collected on our website or our social media pages will state to the user that personal information is being collected.

3.2.6 The APPs also apply to personal information about unsuccessful employment candidates. This may include candidates' resumes, contact details, references, employment history and academic transcripts.

#### **3.3 What happens if you do not provide your personal information to us?**

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3.3.1 If you do not provide personal information that we request in connection with our activities, we may not be able to respond effectively to your enquiry.

#### **3.4 Why does ELSA collect, use, hold and disclose your personal information?**

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3.4.1 We collect, use, hold and disclose your personal information as necessary for purposes directly related to our functions and activities, including:

- a. name and contact details, to provide our products and services to our customers and information and all services relating to our products and services;

- b. name and contact details, to record information regarding products purchased from us and to provide further services, such as repair or replacement of products;
- c. name, contact details, and transaction information such as information on our communications with you;
- d. name and contact details, to supply product warranties and guarantees and all related services; and
- e. name, contact details, educational information, government related identifiers (to the extent it is necessary for us to identify you), for the provision of training to individuals, contracting and for assessing individuals for current or future employment opportunities.

### **3.5 Does ELSA use cookies or other web tracking systems?**

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- 3.5.1 We track traffic patterns throughout the URL (website) registered to ELSA.
- 3.5.2 We use “cookies” on our website. A “cookie” is a small amount of information which is transferred to the hard drive of your computer and which can identify your web browser, but not you. If you want, you can disable your web browser from accepting cookies. If you do so, you can still access our website, but not all services may be available.
- 3.5.3 ELSA may automatically collect general statistical information on our website about visitors to our website, such as IP addresses, browsers used, dates visited, pages visited and number of visitors. However, such information does not refer to individuals by name or their contact details. ELSA uses this data in aggregate to improve our website. We may provide such aggregated data to third parties, but in so doing, we do not provide personal information without the individual’s consent, unless otherwise required by law or a court order.
- 3.5.4 ELSA may use third party providers from time to time to provide us with web analytics services. These providers collect information on how individuals use our website. These providers may use cookies and other technology such as clear gifs or web beacons to obtain such information. This allows ELSA to improve our website and our services.

### **3.6 Will ELSA disclose personal information to anyone else?**

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- 3.6.1 ELSA may, where permitted at law and subject to the terms of this Policy, disclose personal information to:
  - a. our related bodies corporate including for the purposes of monitoring the security of our information technology systems and providing technical support and assistance;
  - b. third party contractors and providers of goods and services (including, without limitation, recruitment, training, human resources, and payroll services) to ELSA under a contract;
  - c. research companies who undertake surveys and audits for us;
  - d. insurance companies; and
  - e. professional service firms providing services to ELSA.
- 3.6.2 Where ELSA discloses personal information to third parties, we have agreements in place to ensure that third parties comply with the APPs (or similar standards overseas). We may also provide your information to others, if required or permitted to do so by law, in accordance with the APPs. ELSA will only disclose your personal information:
  - a. with your consent; or
  - b. for a purpose which you would reasonably expect; or
  - c. as required or permitted by law; or
  - d. in accordance with this Privacy Policy.

**3.7 Does ELSA disclose personal information overseas?**

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3.7.1 We may disclose personal information overseas to our related bodies corporate located in Israel or other countries for the purposes outlined above.

**4 SENSITIVE INFORMATION**

**4.1 Collection of Sensitive Information**

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4.1.1 Under certain limited circumstances, we may be required to collect some forms of personal information that can be sensitive in nature, such as details about an individual's health, sexuality, religious beliefs or criminal record. The Act sets a higher standard for collecting and handling sensitive personal information. ELSA will only collect sensitive information if it is considered reasonably necessary.



**5 UNSUBSCRIBE, ACCESS, CORRECTION & REMOVAL OF PERSONAL INFORMATION**

**5.1 Unsubscribing from email lists**

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5.1.1 Any time ELSA sends emails for marketing or promotional purposes, our emails will contain instructions on how you may unsubscribe from the relevant email list in respect of direct marketing.

**5.2 Unsubscribing from social media pages**

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5.2.1 Our social media pages provide instructions as to how you can unsubscribe from the relevant social media website or page.

**5.3 Unsubscribing from hard copy promotional materials**

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5.3.1 If we send you hard copy promotional materials, such materials will include instructions on how you may unsubscribe from receiving such materials.

**5.4 Dealing with us anonymously or using a pseudonym**

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5.4.1 You may deal with ELSA on an anonymous basis or by using a pseudonym when making inquiries through our website or social media pages, or when you make general inquiries by telephone and do not require a further response from us. However, there are exceptions where this is not practical and we may need certain contact details from you to respond to inquiries. Generally, we will require your personal information in order to transact with you.

**5.5 Access, correction, or removal of your personal information**

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5.5.1 You may seek to access or correct your personal information at any time by contacting ELSA's Privacy Officer by email at [privacy.officer@elbitsystems.com.au](mailto:privacy.officer@elbitsystems.com.au) or by mail to: Privacy Officer, Elbit Systems of Australia Pty Ltd, PO Box 591, Port Melbourne, VIC 3207.

5.5.2 If we do not agree to provide you with access to your personal information or to amend or annotate the information we hold about you, you may seek a review of our decision.

5.5.3 If we do not agree to make the requested changes to your personal information or if we deem that a correction or statement is unnecessary or inappropriate, you may make a statement about the requested changes and we will attach it to your record.

**6 OTHER MATTERS**

**6.1 Security**

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6.1.1 ELSA uses industry-standard methods and takes such steps as are reasonable to protect your personal information from unauthorised access, modification or disclosure and from misuse, interference and loss. Among other techniques, we usually:

- a. store such information on a computer behind our "firewall" in a secure location;
- b. restrict the number of employees internally who can access such data; and
- c. keep hard copies of documents in lockable cabinets in a secure location.

6.1.2 Once personal information is no longer required by us for the purposes for which it was collected or held or otherwise in accordance with the APPs, we will take all steps as are reasonable in the circumstances to ensure that it is either destroyed or de-identified, unless a law or court order requires it to be retained.

**6.2 Complaints**

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6.2.1 You can send written complaints about a breach of the APPs in relation to your personal information to ELSA's Privacy Officer by email at [privacy.officer@elbitsystems.com.au](mailto:privacy.officer@elbitsystems.com.au) or by mail to Privacy Officer, Elbit Systems of Australia Pty Ltd, PO Box 591, Port Melbourne, VIC 3207.

6.2.2 Complaints will be reviewed by ELSA's Privacy Officer and a response will usually be provided within 30 days of receipt of the complaint.

6.2.3 If you believe that your complaint has not been satisfactorily addressed by us, after following the procedure set out above, you can make a complaint to the Office of the Australian Information Commissioner (OAIC).

6.2.4 For more information about making a complaint, contact our Privacy Officer.

**6.3 Amendments**

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6.3.1 ELSA may amend this Policy at any time to reflect our current privacy practices or changes in the law. Amendments to this Policy will be posted on our website and will be effective when posted. Please check our website regularly for updates or amendments to this Policy.