

NETCOMM WIRELESS'S COMMITMENT TO PRIVACY

NetComm Wireless Pty Ltd (ACN 002 490 486) is a wholly owned subsidiary of Casa Systems, Inc.

NetComm Wireless Pty Ltd (ACN 002 490 486), its subsidiaries and affiliates (collectively referred to as NetComm Wireless) are committed to managing personal information in accordance with the Australian Privacy Principles under the Privacy Act 1988 (Cth), the General Data Protection Regulation (EU) 2016/679 (GDPR) and in accordance with other applicable privacy laws.

This document sets out our policies for managing your personal information and is referred to as our Privacy Policy.

In this Privacy Policy, "we", "us", and "our" refers to NetComm Wireless and "you" refers to any individual about whom we collect personal information.

This Privacy Policy applies to all personal information collected by us, or submitted to us, whether offline or online, including personal information collected or submitted through our website www.netcomm.com, through our official social media channel pages which we control (such as our LinkedIn page), as well as through HTML-formatted email messages that we send to you or any Apps that you use in connection with our products.

This Privacy Policy only applies to personal information and not to other data or information we may collect, use, disclose or otherwise handle.

ABOUT NETCOMM WIRELESS

NetComm Wireless offers a complete range of fixed broadband hardware products and fast growth network-grade connectivity solution services, including in the fast growth categories of Fixed Wireless broadband, wireless M2M/Industrial IoT and Fibre and Cable to the distribution point (FTTdp/CTTdp) technologies.

OTHER TERMS WHICH APPLY

Other terms may also apply to you and the information we hold about you. For example, if you are employed with us you may have specific privacy terms in your employment contract with us. If you are employed by our UK subsidiary a separate GDPR Privacy Notice & Personnel Data Retention Policy also applies to you.

Sometimes we also provide a privacy collection statement at the time we collect personal information from you. This privacy collection statement may include additional terms.

WHAT INFORMATION DOES NETCOMM WIRELESS COLLECT ABOUT YOU?

Customers and prospective customers and other business partners

Our customers include:

- organisations in the network infrastructure sector;
- telecommunication carriers;
- internet service providers;
- systems integrators; and
- organisations in various vertical industry sectors.

We generally only deal directly with our customers (see above). If you have a NetComm product in your home or office, we don't generally collect your personal information and this Privacy Policy may not be relevant to you. You should consult the privacy policy of the entity who provided you with your NetComm product (such as your internet service provider) to see how they handle your personal information in handled by them.

When your organisation enquires about our products or services or when your organisation becomes a customer of NetComm Wireless, or we otherwise do business with you (because you work for one of our suppliers, resellers, distributors or other business partners), a record is made which may include your personal information.

The type of personal information that we collect will vary depending on the circumstances of collection and the purpose for which we are dealing with you, but will typically include:

- personal details such as your name, title, e-mail address, postal address and other business contact details (such as your LinkedIn profile);
- information about your employer or an organisation who you represent;
- your professional details (such as your job title);
- in limited circumstances, device, product or solution information from NetComm Wireless devices, products and solutions which you may be using in your home and office (e.g. CloudMesh branded devices) may collect data that can reasonably identify you, such as MAC/IP address, serial numbers, WLAN identifiers, model numbers, device health metrics, radio spectrum parameters and network connection and data throughput statistics;
- any additional personal information you provide to us, or authorise us to collect, as part of your interaction with NetComm Wireless (such as your dietary requirements if you are attending an event which we are hosting); and
- other contact details regarding our interactions and transactions with you and the organisation you represent.

Prospective employees and applicants

We collect personal information when recruiting team members, such as your name, title, contact details, qualifications and work history (including references and other information included in a CV or cover letter as part of the application process). Generally, we will collect this information directly from you.

We may also collect personal information from third parties in ways which you would expect (for example, from recruitment agencies or referees you have nominated). Before offering you a position, we may collect additional details necessary to conduct background checks to determine your suitability for certain positions.

We may also collect relevant information from third party sources such as LinkedIn and other professional websites.

In rare and specific circumstances, we may collect what is classified as “sensitive information” under applicable privacy laws. We only ever do this to the extent such sensitive information is relevant to our functions and activities and in accordance with applicable privacy laws.

As noted above, there may be other relevant privacy terms which apply to you in your employment contract and if you are located in the United Kingdom and apply for a position with NetComm Wireless (UK) Limited, our GDPR Privacy Notice & Personnel Data Retention Policy will also apply to you.

Upon accepting a role, we may collect further information (e.g. Date of Birth, address, etc) and create your payroll file in order for you to be paid.

End users of NetComm products and/or services

We generally only deal directly with our customers such as internet service providers (see above). If you have a NetComm product or solution in your home or office, we don't generally collect your personal information, except in the limited circumstances set out in this Privacy Policy or as we may otherwise notify you from time-to-time.

You should always consult the privacy policy, privacy notices and other terms and conditions of the entity who provided you with your NetComm product or solution (such as your internet service provider) to see how your personal information is handled by them.

In limited circumstances, devices or solutions provided by NetComm Wireless typically used in a home or office environment, such as our CloudMesh branded devices, collect data that can reasonably identify you. This includes MAC/IP address, serial numbers, WLAN identifiers, model numbers, device health metrics, radio spectrum parameters and network connection and data throughput statistics.

Visitors to our websites

The way in which we handle the personal information of visitors to our websites is discussed below.

HOW AND WHY DOES NETCOMM WIRELESS COLLECT AND USE YOUR PERSONAL INFORMATION?

NetComm Wireless collects personal information reasonably necessary to carry out our business, to assess and manage our customer's needs, and to provide products and services. We may also collect information to fulfil administrative functions associated with these services, for example billing, entering into contracts with you and/or third parties and managing customer and other business relationships.

NetComm Wireless generally collects personal information directly from you. We may collect and update your personal information over the phone, by email, over the internet or social media, or in person. We may also collect personal information about you from other sources, for example:

- our affiliated and related companies;
- third party suppliers and contractors who assist us to operate our business;
- from Remote Device Management Platforms on some of NetComm Wireless's products; and
- in rare circumstances from our customers who may provide your information to enable NetComm Wireless to:
 - configure NetComm Wireless manufactured devices on behalf of the customer; or
 - process warranty claims.

Information from devices, products and solutions

Some of our devices, products and solutions (including mobile and web applications we may make available from time-to-time) collect data about you, which may include personal information.

For example, if you are using NetComm Wireless devices, products and solutions we may also collect data (including personal information) directly from that device, product or solution so that we can provide services to our customers such as internet service providers and also improve our own products, services and solutions.

We may provide a separate data collection statement which contains more details about how any personal information is collected, used, disclosed and otherwise handled by us. If you are using the CloudMesh integrated suite of devices you can find more information at www.netcomm.com under the "CloudMesh Data Collection Statement" drop-down heading.

Purpose of collection

The purposes for which NetComm Wireless usually collects and uses personal information depends on the nature of your interaction with us, but may include:

- responding to requests for information and other general inquiries about our products and services;
- managing our relationship with you if you are a supplier or other business partner;
- managing, planning, advertising and administering programs and events which may be of interest to you;
- providing solutions and other services such as back-end services and data analytics to our customers such as internet service providers so that they can deliver their products and services to you in your home or office including the CloudMesh integrated suite of devices;

- researching, developing and expanding our products and services;
- informing you of our activities, products and services;
- recruitment processes (including for contractors);
- responding to enquires and complaints; and
- notifying you of actual or potential defects in NetComm products or services we have provided to you and information on how to rectify the defect.

NetComm Wireless also collects and uses personal information for market research purposes and to innovate our delivery of products and services.

We have a legitimate interest in using your information in the ways listed above. In some cases, it will be lawful for us to collect and use your personal information, for example where it is necessary as part of our, or a third party's, statutory or public functions or because the law permits or requires us to.

HOW DOES NETCOMM WIRELESS INTERACT WITH YOU VIA THE INTERNET?

You may visit our websites (including www.netcomm.com) without identifying yourself. If you identify yourself (for example, by logging onto a customer specific portal, a technical support portal or by providing your contact details in an enquiry), any personal information you provide to NetComm Wireless will be managed in accordance with this Privacy Policy.

NetComm Wireless's websites make use of Google Analytics to look at how our websites are used. This is done by placing small text files, known as 'session cookies' on your device to collect information about how visitors use our websites. We use this information to compile reports and to help us improve our websites. The session cookies collect information in an anonymous form, including the number of visitors to our websites, where visitors have come to our websites from and the pages they have visited.

NetComm Wireless's websites may contain links to third-party websites. NetComm Wireless is not responsible for the content or privacy practices of websites that are linked to our website.

CAN YOU DEAL WITH NETCOMM WIRELESS ANONYMOUSLY?

NetComm Wireless will provide individuals with the opportunity of remaining anonymous or using a pseudonym in their dealings with us where it is lawful and practicable (for example, when making a general enquiry). Generally, it is not practicable for NetComm Wireless to deal with individuals anonymously or pseudonymously on an ongoing basis. If we do not collect personal information about you, you may be unable to utilise our services or participate in our events, programs or activities we manage or deliver.

For users of CloudMesh branded devices, it is currently not possible to configure the device to prevent it from collecting the data mentioned on the previous page. If you want to remain anonymous you should not use the CloudMesh branded devices.

HOW DOES NETCOMM WIRELESS HOLD INFORMATION?

NetComm Wireless stores information in paper-based files or other electronic record keeping methods in secure databases (including trusted third-party storage providers based in Australia and overseas). Personal information may be collected in paper-based documents and converted to electronic form for use or storage (with the original paper-based documents either archived or securely destroyed). We take reasonable steps to protect your personal information from misuse, interference, and loss and from unauthorised access, modification or disclosure.

NetComm Wireless maintains physical security over paper and electronic data stores, such as through locks and security systems at our premises. We also maintain computer and network security; for example, we use firewalls (security measures for the Internet) and other security systems such as user identifiers and passwords to control access to our computer systems.

HOW LONG WILL YOUR PERSONAL INFORMATION BE KEPT BY NETCOMM WIRELESS?

We will only keep the personal information we collect about you for as long as is necessary for the purposes set out in this Privacy Policy or as required to comply with any legal obligations to which we are subject. The retention periods we apply take account of:

- legal and regulatory requirements and guidance;
- limitation periods that apply in respect of taking legal action;
- our ability to defend ourselves against legal claims and complaints;
- good practice; and
- the operational requirements of our business.

We take steps to destroy or de-identify information that we no longer require or as required by an applicable law.

DOES NETCOMM WIRELESS USE OR DISCLOSE YOUR PERSONAL INFORMATION FOR DIRECT MARKETING?

We have a legitimate interest in processing your personal information for promotional purposes and NetComm Wireless may use or disclose your personal information for the purpose of informing you about our services, upcoming promotions and events, or other opportunities that may interest you or as otherwise permitted under applicable privacy laws.

This means under certain privacy laws we do not usually need your consent to send you marketing communications such as our newsletter. However, where consent is required under applicable privacy laws, we will ask for this consent separately and clearly. If you do not want to receive direct marketing communications, you can opt-out at any time by contacting us using the contact details below or using the opt-out functionality contained in the electronic message.

If you opt-out of receiving marketing material from us, NetComm Wireless may still contact you in relation to its ongoing relationship with you.

HOW DOES NETCOMM WIRELESS USE AND DISCLOSE PERSONAL INFORMATION?

For Customers and other Business Partners

The purposes for which we may use and disclose your personal information will depend on the reason we are interacting with you. For example, if you have engaged us to deliver our products and services to your organisation, we may disclose information about you to our service providers where required to provide your organisation with the relevant products and services.

Disclosure to contractors and other service providers

NetComm Wireless may disclose information to third parties we engage in order to provide our services, including contractors and service providers used for freight and logistical services, data processing, data analysis, customer satisfaction surveys, information technology services and support, website maintenance/development, printing, archiving, mail-outs, and market research.

If you are an end-user of CloudMesh branded devices, we may also share your personal information we have collected about you with our customers (such as internet service providers) who are providing their products and services to you.

Personal information may also be shared between related and affiliated companies of NetComm Wireless, located in Australia and overseas.

Third parties to whom we have disclosed your personal information may contact you directly to let you know they have collected your personal information and to give you information about their privacy policies.

Use and disclosure for administration and management

NetComm Wireless will also use and disclose personal information for a range of administrative, management and operational purposes. This includes:

- administering billing and payments and debt recovery;
- planning, managing, monitoring and evaluating our products and services;
- quality improvement activities;
- statistical analysis and reporting;
- training team members, contractors and other workers;
- risk management and management of legal liabilities and claims (for example, liaising with insurers and legal representatives);
- responding to enquiries and complaints regarding our products and services;
- obtaining advice from consultants and other professional advisers;
- notifying our customers and users of NetComm products and/or services of known or potential defects and instructions on how to rectify the defects; and
- responding to subpoenas and other legal orders and obligations.

Other uses and disclosures

We may use and disclose your personal information for other purposes explained at the time of collection (such as in a specific privacy collection statement or notice) or otherwise as set out in this Privacy Policy.

DOES NETCOMM WIRELESS DISCLOSE YOUR PERSONAL INFORMATION OVERSEAS?

NetComm Wireless is a global organisation and works with customers, suppliers, resellers, service providers, sponsors and commercial interests across the globe. It is likely that your personal information will be disclosed to overseas recipients including to service providers who may handle, process or store your personal information on our behalf.

The recipients of such information may be located in Australia, Japan, United Kingdom, India or the United States of America.

Entities which are related entities of NetComm Wireless, or are otherwise affiliated with NetComm Wireless, have operations in New Zealand, the United Kingdom, Europe, Canada and the United States of America.

We generally collect personal information about you in Australia or the jurisdiction in which the NetComm Wireless affiliate you are dealing with is located.

It is likely that your personal information will be transferred outside of the jurisdiction it was collected.

We only ever disclose your personal information outside the jurisdiction it was collected where we are permitted to do so under applicable privacy laws. Generally, this means we will take reasonable steps to ensure your personal information is treated securely and in accordance with applicable privacy laws, including, where relevant, by entering into EU standard contractual clauses (or equivalent measures) with the party outside the European Economic Area. The EU standard contractual clauses are available [here](#).

There are other circumstances where we may disclose your personal information to an overseas recipient. For example, you have provided your consent, or we are otherwise permitted to do so under the Australian Privacy Principles or other relevant laws.

RESIDENTS IN THE EUROPEAN ECONOMIC AREA

If the **GDPR** applies to you, you have the following additional and specific rights in relation to your personal information (where applicable):

- **Access:** you have the right to request a copy of any personal information we hold about you. Any request for access to or a copy of your personal information must be in writing and we will endeavour to respond within a reasonable period and in any event within one month (in compliance with the GDPR).
- **Rectification:** you have the right to the rectification of your personal data, if you consider that it is inaccurate.
- **Deletion:** you have the right to request that we delete personal information that we process about you, except where we are not obliged to do so if we need to retain such personal information in order to comply with a legal obligation or to establish, exercise or defend legal claims.
- **Restriction:** you have the right to erasure of your personal information, if you consider that we do not have the right to hold it.
- **Portability:** you have the right to ask us to transfer a copy of your personal information to you or to another service provider or third party where technically feasible.
- **Objection:** you have the right to object to your personal information being processed for a particular purpose or to request that we stop using your information.
- **Complaint:** If you are unhappy with our treatment of your personal information, and you have contacted us as set out below, you have the right to lodge a complaint with the local data protection authority.

If you have consented to our processing of your personal information, you have the right to withdraw, at any time, any consent that you have previously given to us for use of your personal information. In certain circumstances even if you withdraw your consent we may still be able to process your personal information if required or permitted by law or for the purpose of exercising or defending our legal rights or meeting our legal and regulatory obligations.

To make a request to exercise any of these rights (where applicable) in relation to your personal information, please contact us using the contact details below.

HOW CAN YOU ACCESS OR SEEK CORRECTION OF YOUR PERSONAL INFORMATION?

You are entitled to request access to your personal information held by NetComm Wireless. To request access to your personal information please contact our Privacy Officer using the contact details set out below.

We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up-to-date. You can help us to do this by letting us know if you notice errors or discrepancies in information we hold about you and letting us know if your personal details change.

However, if you consider any personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading you are entitled to request correction of the information. After receiving a request from you, we will take reasonable steps to correct your information.

We may decline your request to access or correct your personal information in certain circumstances in accordance with the Australian Privacy Principles and/or GDPR. If we do refuse your request, we will provide you with a reason for our decision and, in the case of a request for correction, we will include a statement with your personal information about the requested correction.

WHAT SHOULD YOU DO IF YOU HAVE A COMPLAINT ABOUT THE HANDLING OF YOUR PERSONAL INFORMATION?

You may contact NetComm Wireless at any time if you have any questions or concerns about this Privacy Policy or about the way in which your personal information has been handled.

You may make a complaint about privacy to the Privacy Officer at the contact details set out below.

The Privacy Officer will first consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint. We will generally respond to your complaint within a week.

If your complaint requires more detailed consideration or investigation, we will acknowledge receipt of your complaint within a week and endeavour to complete our investigation into your complaint promptly. We may ask you to provide further information about your complaint and the outcome you are seeking. We will then typically gather relevant facts, locate and review relevant documents and speak with individuals involved.

In most cases, we will investigate and respond to a complaint within 30 days of receipt of the complaint. If the matter is more complex or our investigation may take longer, we will let you know.

If you are not satisfied with our response to your complaint, or you consider that NetComm Wireless may have breached the Australian Privacy Principles or the Privacy Act 1988 (Cth), a complaint may be made to the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992 or by using the contact details on the website www.oaic.gov.au.

If you are outside of Australia, you may wish to take your complaint up with the local data protection authority in your jurisdiction.

HOW CHANGES ARE MADE TO THIS PRIVACY POLICY?

NetComm Wireless may amend this Privacy Policy from time to time, with or without notice to you. We recommend that you visit our website regularly to keep up to date with any changes. We also try to let you know about major changes to our Privacy Policy (for example by putting a notice up on our website).

HOW CAN YOU CONTACT NETCOMM WIRELESS?

The contact details for NetComm Wireless are:

NetComm Wireless Privacy Officer
Level 5, 18-20 Orion Road, Lane Cove, NSW 2066, Australia
Email: cad-privacy-info@casa-systems.com
Phone: +61 2 9424 2000