

## **DWS GROUP PRIVACY STATEMENT**

**Effective Date:** 30<sup>th</sup> June 2025

### **Who are We?**

We are The DWS Group, its subsidiaries and affiliated entities (hereinafter “DWS Group”, “We” or “Us”). DWS Group is the Data Controller of your personal data as described in this Privacy Statement, unless otherwise specified.

DWS Group is committed to protecting your personal data and respecting your privacy and rights, and this statement is intended to provide you with information on how your personal data is processed.

### **What does this Privacy Statement cover?**

This Privacy Statement applies to any personal data We may process about you that may be collected directly from you when you interact with Us or from third parties, such as when you:

- Visit our public-facing DWS Group-branded websites and other online services, including social media pages.
- Send or receive communications from or to Us, including emails, phone calls, and texts.
- Use our products and services (for example, as an employee of one of our customers who provided you with access to our products or services) to the extent that We are acting as a controller of your personal data. You should be aware that processing of personal data is required for receiving certain products or services.
- Access downloadable applications from mobile devices in accordance with their respective privacy statements.
- Participate in activities such as events, webinars, training, and campaigns
- Visit our offices.
- Access, use, or download content from us (newsletters, reports etc).

This Privacy Statement will be available via link on all sites and services which it covers. Other DWS Group websites, apps, or online services may collect and use personal data about you for different purposes and will accordingly publish a separate policy statement/ terms and conditions specific to the processing activity. Our websites and services may contain links to other websites, applications and services not owned by DWS Group and We do not control the content or privacy practices of those sites. The information practices of other services, or of social media platforms that host our branded social media pages, are governed by their privacy statements, which you should review to better understand their privacy practices.

Our websites and offerings are directed to people in their business or professional capacities. They are not intended for children under 18 years of age. We do not knowingly solicit information online from, or market online to, children under 18 years of age. If you are a parent or guardian and believe your child has provided Us with personal data without your consent, please contact Us as indicated below and We will take steps to delete their personal data from our systems.

This Privacy Statement does not apply to the extent We process personal data in the role of a data processor or service provider, including personal data processed on behalf of our customers.

## **What personal data do We process?**

For the purposes of this Statement, 'Personal Data' means any information about you from which you can be identified, whether derived from that information on its own or when combined with other information, that We or another party may hold about you.

**Types of data:** Depending on the nature of your interaction with Us, this information may include business contact details (such as name, title, company, email address or telephone number), the content of your communication, information about how you use our website and our products or services, your feedback, interests in our products and services, and any publicly available information relevant from a business-to-business perspective. In addition, this may include information about your computer and about your visits to and usage of this site, such as your Internet Protocol (IP) address, your computer's operating system and browser type, and information collected via cookies.

This may also include collecting personal data about you from a third party who is authorised to act on your behalf or from third party services that you use to interact with our services. We may also collect your personal data from other sources such as public databases, joint marketing partners, and social media platforms, to the extent permitted by applicable laws.

If you provide Us with any personal data relating to other individuals, you represent that you have the authority to do so and, where required, you have obtained any necessary consent. You acknowledge that this personal data may be used in accordance with this Privacy Statement.

Mobile Apps published by DWS Group are governed by their respective privacy policies which can be accessed upon downloading them. With regards to Mobile Apps, in addition to contact information, We or Our service providers (such as mobile operating system and platform providers) may also collect information relating to your device, including your device model, operating system, browser type, unique device identifier, IP address, mobile phone number, mobile network carrier, location, and the way you are using the Mobile App. The information collected will depend on the functionality of the specific Mobile App you are using. If any other information is collected relating to your use of a Mobile App, such information will be specified in the Mobile App.

## Why do We process your personal data?

We process your personal data for specified and lawful purposes only and in accordance with the applicable data protection laws.

Your personal data will be processed by DWS Group for the following purposes:

Legal basis as applicable per the Privacy & Data Protection Laws	Why We process your data
Legitimate interest	<p>Providing, developing, and improving our products, websites and services and assessing and improving user experience</p> <p>To prevent fraud or criminal activity and to safeguard the security of our interest including our websites and services</p> <p>Identifying and assessing customer interest and opportunities</p> <p>Providing reference materials (whitepapers vision documents etc.) and managing corporate event registration and attendance</p> <p>To the extent permitted by applicable laws and regulations, conducting marketing activities, including sending or displaying product and services-related materials, managing user and event registrations</p> <p>Recording phone and/or video calls and chats for training, quality assurance and administrative purposes</p> <p>Registering office visitors</p>
For taking steps at your request prior to entering into a contract and/or for performance of a contract	<p>To provide and deliver our products and services, including managing our licenses, registrations, subscriptions, user access, capacity, billing/payments, support, purchases, police clearances, visa checks, government clearances etc.</p> <p>To provide you with requested materials, information, when you interact with Us, answer your queries</p> <p>Managing contests or promotions</p> <p>Managing billing and payments</p> <p>Managing the relationship established with you</p>

Compliance with Legal Obligations	To comply with legal obligations to which We are subject, such as keeping records for tax, employment, Workcover, Centrelink and immigration law purposes, or providing information to a public body or law enforcement or government agencies
Consent	<p>Subject to local data protection regulations, where consent is required to:</p> <p>Send you marketing communications (unless you have objected to or opted out of such communications)</p> <p>Call or send you communications to discuss your products or services or provide you with offers and trials</p> <p>To customise individuals' online experience and improve the performance, usability and effectiveness of DWS Group online presence</p> <p>Collecting and processing information from your mobile device</p> <p>The processing of personal data that you voluntarily provide for specific purposes.</p>

#### **How long do We retain your personal data?**

We retain your personal data for as long as it is necessary to fulfil the purposes for which it was collected, or longer if required to fulfil our legal and contractual obligations. After expiration of the retention period, your personal data will be deleted. If We are unable to completely delete the personal data from our systems, We will ensure that there are appropriate measures in place to secure the information and protect it from further use.

## **What are your rights and how can you exercise them?**

Depending on your relationship with DWS Group and in line with local data protection laws, you may have several rights in relation to your Personal Data such as:

- Right of access: Right to request a copy of the information that DWS Group holds on them.
- Right of correction: Right to correct data that is inaccurate or incomplete.
- Right to be informed: DWS Group informs individuals on what data is collected, how it is used, how long it will be retained and whether it will be shared with any third parties.
- Right to object/Opt-out: Right to challenge certain types of processing such as processing in relation to direct marketing as may be applicable.
- Right to withdraw consent: Any personal information collected under consent (e.g., sensitive information or personal information wrongly collected with consent) can be withdrawn.
- The right to not identify oneself: The right to not identify oneself when dealing with an APP entity (i.e., deal anonymously), unless impracticable or required by law.

Please note, these rights are subject to exemptions and may not apply in all circumstances. If you wish to exercise these rights, DWS Group will provide you with the requested information or will action your request within stipulated timelines as per applicable privacy and data protection laws, after receipt of your verified request, subject to any extensions that may be required and communicated to you.

To exercise these rights or for more information about your rights, please email us via [privacy@dws.com.au](mailto:privacy@dws.com.au)

## **With whom do We share your personal data?**

Information that we collect may from time to time be stored, processed in or transferred between parties located in countries outside of Australia. These transfers will be undertaken in compliance with applicable law(s) and regulation(s).

We may transfer or share your Personal Data with third parties such as our service providers and vendors, business partners, professional and corporate advisors, public or government authorities including law enforcement, network providers, third party websites, and our affiliates or subsidiaries.

When required, DWS Group may disclose your Personal Data to external law enforcement bodies or regulatory authorities, to comply with legal obligations. We may also disclose your personal data where mandated by law and as further required when We believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.

In the event of a merger, reorganization, dissolution or other fundamental corporate change, We may need to disclose your information to a third party in accordance with applicable laws.

We use a range of security measures to protect your personal data from unauthorized or unlawful access, loss, disclosure, or alteration, including technical, organizational, and physical measures. We have sufficient controls, policies, procedures, and the guidance in line with industry best practices and standards to ensure the security of personal data is maintained at all stages of its lifecycle.

Still, no system can be guaranteed to be 100% secure. If you have questions about the security of your personal information, or if you have reason to believe that the personal information that we hold about you is no longer secure, please contact us immediately via [privacy@dws.com.au](mailto:privacy@dws.com.au)

**How can you contact Us if you have any questions?**

If you have any questions or concerns about this Privacy Statement or how your Personal Data is processed, by contacting us via [privacy@dws.com.au](mailto:privacy@dws.com.au)

If you have any grievance or complaint about how your personal data is processed, you can contact the HR Team via [askus@dws.com.au](mailto:askus@dws.com.au)

**How will We update this Privacy Statement?**

We may amend this Privacy Statement from time to time. If We materially change our Privacy Statement, we will provide notice prior to the update taking effect by posting a notice on our website or, where required by law, providing you with notice of such updates. We encourage you to visit our sites periodically to stay informed about our privacy practices.