

DWS GROUP VISITOR PRIVACY NOTICE

Effective Date: 30th June 2025

INTRODUCTION

DWS Group is committed to protecting the Personal Data it collects from individuals who are visiting the company premises of DWS Group (hereinafter referred to as 'DWS Group (DWS', 'we', 'our', 'us'). This Notice outlines and explains the purposes and legal grounds of processing your personal data as visitors and measures taken by DWS Group to protect your privacy in accordance with applicable privacy legislation.

What Does This Notice Cover?

This Notice aims to provide you with information on what Personal Data we process, why we process your Personal Data, and how we process your Personal Data including details on the principles we abide by, as well as informing you of rights that you may be able to exercise on your Personal Data.

What Personal Data Do We Process?

For this Notice, '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). It may include general personal data such as your name, address, contact details, time of entry & exit at DWS Group premises, CCTV images, and in some cases sensitive personal data such as government identification number for identity verification and health information necessary for health and safety compliance and in case of a pandemic or health emergencies.

Why we process your Data and what is the legal basis for that?

Purpose of processing: Collections and processing of visitor personal data is necessary to manage the entry and exit of visitors to DWS Group premises, ensure safety of visitors during a crisis, to avoid potential security threats to DWS Group's human assets and informational assets.

Legal Basis of processing: Processing is necessary for the Legitimate interest of DWS Group (as an organisation) or based on the consent of the visitor as per the local law of the land or for certain legitimate uses as specified in the applicable data protection laws.

With whom do we share your personal data?

Your Personal Data may be shared with external auditors for audit-related purposes, Third Parties empanelled by DWS Group for providing Workplace Security services, forensics or investigations, consultancy, and legal advice, etc. and we may also be required to share your data with Law enforcement or government agencies in line with applicable local laws.

All third parties other than government or law enforcement agencies will process shared personal data as a data processor and as per written instructions of DWS Group. DWS Group only engages data processors who can provide an appropriate level of assurance that personal data is processed only for stated purposes and commensurate technical and organisational measures have been implemented to adequately protect the personal data throughout its life cycle. All third parties are required to enter into written agreements with DWS Group.

Please note that we do not use fully automated decision-making processes to process the above-specified Personal Data.

How Long Do We Retain your Personal Data?

We retain your Personal Data for as long as it is commensurate to the purpose for which it is collected. We may retain your Personal Data for a longer period, if we are required to do so as per applicable laws or to establish, exercise or defend our legal rights (including defending DWS Group against litigation). We have implemented appropriate measures to ensure your personal information is securely destroyed in a timely and consistent manner when no longer required.

Is Your Data Transferred Across International Borders?

DWS Group is an Australian organisation, so your Personal data, may be transferred for any of the above stated purposes to different Australian DWS Group office locations. These transfers will be undertaken in compliance with applicable law(s) and regulation(s).

What are your rights and how can you exercise them?

Your rights may differ depending on applicable local laws, but generally (as far as applicable laws provide you with such rights), you would be entitled to the rights summarised below in broad terms:

- 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.

You are entitled to receive your Personal Data free of charge except in the following circumstances where we may charge a reasonable fee to cover our administrative costs of providing the Personal Data for:

- manifestly unfounded or excessive/repeated requests, or
- further copies of the same information.

To exercise these rights or for more information about your rights, please email us via privacy@dws.com.au

How Do We Safeguard your Personal Data We Have Collected from You?

We implement and maintain appropriate technical, organizational, and physical security measures to protect your Personal Data and these security measures are in line with industry best practices.

How Do We Update This Notice?

We may update this Notice from time to time. We will publish any updated version of this notice on the DWS Group intranet sites. We may also communicate changes to this notice to you by email or by other relevant mean(s), if need be.

Except as otherwise stated in this notice, any updates to this Notice will be effective from the date on which they are communicated to the relevant parties.

Who can you contact?

Any questions or concerns about the operation of this document or complaints you can contact us via privacy@dws.com.au

If you are a visitor at any of our offices within and outside Australia and you have any concerns about how your Personal Data is processed, then you can contact us via privacy@dws.com.au

You also have a right to lodge a complaint with a regulator or data protection supervisory authority in the jurisdiction of your habitual residence, place of work or place of the alleged infringement.

Annexure A – Definitions:

Applicable Law	Local laws applicable to DWS Group
Affiliates	Affiliate means an entity that owns or controls, is owned or controlled by or is or under common control or ownership with either Client or Contract Partner (as the context allows), where control is defined as the possession, directly or indirectly, of the power to direct or cause the direction of the management and policies of an entity, whether through ownership of voting securities, by contract or otherwise.
Automated Decision Making	Automated decision-making is the process of making a decision by automated means without any human involvement. These decisions can be based on factual data, as well as on digitally created profiles or inferred data.
Data Controller or Controller	The entity/person who (either alone or jointly or in common with other entities/persons) determines the purposes for which and the way any Personal Data are or are to be processed. A controller may also be referred to as an APP entity or an Agency. The term 'Controller' or 'Data Controller' maybe be defined differently across jurisdictions.
Data Processor or Processor	Any person or an entity who processes the data on behalf of the Controller. A processor may also be referred to as an APP entity or an Agency. The term 'Processor' or 'Data Processor' maybe be defined differently across jurisdictions.
Data Subject	Any identified or identifiable living individual natural person.
Personal Data	Data or set of data that can identify an individual, such as name, address, telephone number, and email address.
Profiling	Profiling analyses aspects of an individual's personality, behaviour, interests and habits to make predictions or decisions about them.
Special Categories of Personal Data/Sensitive Data	Any Personal Data revealing 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 and health information, genetic information, and/or biometric information used for automated biometric verification or biometric identification.
Third Party	Any external body to which personal data is transferred by DWS Group, if such body is contracted for processing personal data on behalf of DWS Group or any of its subsidiary or affiliate.