

Privacy Policy



Last Updated: September 2024

Shogun Cybersecurity values and respects the privacy of the people we do business with. We are committed to protecting your privacy and complying with the Privacy Act 1988 (Cth) (Privacy Act) and other applicable privacy laws and regulations.

This Privacy Policy describes how we collect, hold, use, and disclose your personal information, and how we maintain the quality and security of your personal information.

What is personal information?

“Personal information” means any information or opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable. In general terms, this includes information or an opinion that personally identifies you either directly (e.g. your name) or indirectly.

What personal information do we collect?

The personal information we collect about you depends on the nature of your dealings with us. In general, we do not collect personal information, except what you choose to share with us, either explicitly, or by engaging with us electronically. It may include, but is not limited to:

- name(s);
- mailing or street address;
- email address;
- IP address; and
- phone number.

You do not have to provide us with your personal information. However, if you choose not to provide us with your personal information, we may not be able to provide you with our services or otherwise interact with you.

How do we collect your personal information?

We may collect your personal information directly from you when you:

- become a Shogun Cybersecurity customer;
- attend a Shogun Cybersecurity event;
- subscribe to our mailing list;
- apply for a job with us;
- otherwise interact with us in person, over the phone, or online;

Collecting personal information from third parties

We may also collect your personal information from third parties or through publicly available sources, for example from social media sites such as LinkedIn. We collect your personal information from these third parties to enable or support our provision or offering of services to you.

How do we use your personal information?

We use personal information for many purposes in connection with our business activities, including, but not limited to the following:

- provide you with information or services that you request from us;
- deliver to you a more personalised experience or service offering;
- improve the quality of the services we offer;
- billing and internal administrative purposes;
- marketing and research purposes;

Disclosure of personal information to third parties

We may disclose your personal information to third parties in accordance with this policy, in circumstances where you would reasonably expect us to disclose your information, or where otherwise required to by law. For example, we may disclose your personal information to:

- our third-party service providers (for example, our IT and cloud service providers);
- our professional services advisors (for example, our accountant or legal representative);
- a law enforcement agency with a court issued warrant.

Transfer of personal information overseas

Some of the third-party service providers we disclose personal information to may be based in or have servers located outside of Australia, including, but not limited to U.S.A., New Zealand, and Singapore. Where we disclose your personal information to third parties overseas, we will take reasonable steps to ensure that data security and appropriate privacy practices are maintained. We will only disclose to overseas third parties if:

- you have given us your consent to disclose personal information to that third party; or
- we reasonably believe that:
 - the overseas recipient is subject to a law or binding scheme that is, overall, substantially similar to the APPs; and
 - the law or binding scheme can be enforced; or
- the disclosure is required or authorised by an Australian law or court / tribunal order.

How do we protect your personal information?

Shogun Cybersecurity will take reasonable steps to ensure that the personal information that we hold about you is kept confidential and secure, including by:

- Using reputable cloud service providers with well documented and/or independently verified information security practices (e.g. through certifications such as ISO27001).
- taking measures to restrict access to personal information to only such personnel as necessary for us to effectively provide services to you;
- having technological measures in place (for example, encryption, security software, vulnerability management processes, network and host-based firewalls, etc);

Online activity

Cookies

Websites operated by Shogun Cybersecurity website may use cookies. A cookie is a small file which allows our site to recognise when your device has visited our website(s) before, so we can distinguish you from other users of the website.

We do not use cookies to identify you, just to improve your experience on our website(s). If you do not wish to use the cookies, you can amend the settings on your internet browser so it will not automatically download cookies. However, if you remove or block cookies on your computer, please be aware that your browsing experience and our website's functionality may be affected.

Website analytics

Our websites may use third-party analytics services to help us better understand visitor traffic, and so we can improve our services. Although this data is mostly anonymous, it is possible that under certain circumstances, we may connect it to you.

Links to third party sites

Shogun Cybersecurity website(s) may contain links to websites operated by third parties. If you access a third party website via our website(s), personal information may be collected by that third party website. We make no representations or warranties in relation to the privacy practices of any third party provider or website and we are not responsible for the privacy policies or the content of any third party provider or website. Third party websites are responsible for informing you about their own privacy practices and we encourage you to read their privacy policies.

Direct marketing

We may send you direct marketing communications and information about our services, opportunities, or events that we consider may be of interest to you if you have requested or consented to receive such communications.

These communications may be sent in various forms, including mail, SMS, and email, in accordance with applicable marketing laws, such as the Australian Spam Act 2003 (Cth). You consent to us sending you those direct marketing communications by any of those methods. If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.

You may opt-out of receiving marketing communications from us at any time by following the instructions to "unsubscribe" set out in the relevant communication, and/or contacting us using the details set out in the "How to contact us" section below.

In addition, we may also use your personal information or disclose your personal information to third parties for the purposes of advertising, including online behavioural advertising, website personalisation, and to provide targeted or retargeted advertising content to you (including through third party websites).

Retention of personal information

We will not keep your personal information for longer than we need to. In most cases, this means that we will only retain your personal information for the duration of your relationship with us, unless we are required to retain your personal information to comply with applicable laws, for example record-keeping obligations.

How to access and correct your personal information

Shogun Cybersecurity will endeavour to keep your personal information accurate, complete, and up to date. If you wish to make a request to access and / or correct the personal information we hold about you, you should make a request by contacting us and we will usually respond within 30 days.

If you request access to your personal information that we hold, we will evaluate your request to determine whether and to what extent we can provide access. Under certain circumstances, we may refuse or be unable to provide access (for example, if providing access would unreasonably impact on the privacy of others). We may also charge you an appropriate administrative fee to provide you with access to your personal information.

Inquiries and complaints

For complaints about how Shogun Cybersecurity handles, processes or manages your personal information, please contact our Privacy Officer. Note we may require proof of your identity and full details of your request before we can process your complaint.

Please allow up to 30 days for Shogun Cybersecurity to respond to your complaint. It will not always be possible to resolve a complaint to everyone's satisfaction. If you are not satisfied with Shogun Cybersecurity's response to a complaint, you have the right to contact the Office of Australian Information Commissioner (at <http://www.oaic.gov.au/>) to lodge a complaint.

How to contact us

If you have a question or concern in relation to our handling of your personal information or this Policy, you can contact us for assistance as follows:

Email	privacy@shogun.net.au
Phone	1300 848 333 (Australia only)
Post	Attention: Privacy Officer P.O. Box 1760 Preston South, Victoria, 3072 Australia.