

Privacy Policy

Citadel Edge

10 September 2025





Table of Contents

Our commitment to privacy	2
1 Who we are	2
2 Who is responsible for your Personal Information?	2
3 What sort of Personal Information might we collect and hold?	2
4 How does Citadel Edge collect my Personal Information	3
5 How do you use my Personal Information?	4
6 To Whom Might You Disclose My Personal Information?	5
7 Our legal basis for processing	6
8 Communications and Marketing	6
9 Compliance with Laws	6
10 Maintaining The Security of Your Information	7
11 Will Citadel Transfer My Personal Information Outside Australia?	7
12 Additional Information for EU Residents	7
13 Your privacy rights	7
14 Updates to This Notice	8
15 Citadel Edge Companies	8
16 Definitions	9



Our commitment to privacy

Guarding data and information is part of Citadel Edge's DNA. It's important for individuals who interact with us to understand how we handle Personal Information and how you can contact the right people to discuss your privacy. This Policy provides those details.

By providing your Personal Information to us, you consent to our collection, use and disclosure of your Personal Information in accordance with this Privacy Policy and any other arrangements that apply between us.

We may change our Privacy Policy from time to time by publishing changes to it on our website. We encourage you to check our website periodically to ensure that you are aware of our current Privacy Policy.

If you see a capitalised term in this Policy, it is defined in section 16.

1 Who we are

Citadel Edge provides complex IT services, enterprise software development, cyber security, and cloud services to government departments, agencies and commercial organisations. We operate primarily in Australia but also in New Zealand and Malaysia.

This Policy covers the Citadel Edge Companies (referred to in Section 15) operating under the Citadel Edge brand.

2 Who is responsible for your Personal Information?

If a Citadel Edge Company collects your Personal Information then it is the data controller (or the equivalent concept in your region), with responsibility for your Personal Information.

If one of our Clients has collected your Personal Information (for example, where we provide the Client with a managed or cloud service that stores your Personal Information), then the relevant Citadel Edge Company is a data processor (or equivalent concept in your region), and the Client is the data controller.

3 What sort of Personal Information might we collect and hold?

In its business operations, Citadel Edge may collect information in order to provide services to you, your employer, or a person providing services to you. Depending on circumstances, the types of information we collect could include:

- **Business contact Personal Information** – such as your name, job title, employer, work address, work telephone number and work email address. If you choose to provide us with other information, like your personal email address, telephone number or mailing address, then we will collect this information, too;
- **Non-business Personal Information** – such as your name, home address, personal email, home or personal mobile phone number, emergency contact information
- **Device and technical information** – (depending on the service you are using), your Internet Protocol (IP) address, browser information, device ID, type of computer and technical information about how you connect to our websites, social media platforms (such as the operating system and



the internet service provider used). If you are required to log in to gain access to a particular website feature or portal, we collect usernames, passwords and other login credentials to authenticate access.

- **Audio and Visual Data:** If you attend or give a presentation during a Citadel Edge hosted in-person or virtual event, participate in a webinar or agree to be recorded during a telephone conversation or virtual meeting, we may record and store your voice and image and collect other personal information you provide to us, like your professional biography. If you choose to personalize your account with a photo or social media profile, then Citadel Edge will collect this information, too. We may document events in other ways, too, such as by taking photographs, conducting interviews and recording participation in a live question-and-answer session.
- **Cookies and Analytics Data:** Citadel Edge and its third-party service providers use cookies, local storage, scripts and similar technologies with all our websites and some social media platforms so they function properly. We use such technologies to continuously improve our websites and to customize your experience when you visit them. To some extent, cookies and analytics technologies help us provide you with custom, personalized content (including targeted advertising), identify you across multiple devices and monitor aggregate metrics such as total number of visitors, traffic, usage and demographic patterns. [See our separate Cookies Policy that sets out what the cookies on our website do.
- **Feedback Data:** Through our websites and social media platforms, Citadel Edge makes available various online community forums and blogs. You may choose to participate with these resources by interacting with us, interacting with other users or adding your own posts. Citadel Edge may invite you to participate in studies or otherwise provide feedback about your experience. If you do so, then Citadel Edge considers your participation and your posts to be freely given, and we may collect and use your feedback without compensation or attribution to you. However, we're under no obligation to publish, maintain or retain any of your posts.

4 How does Citadel Edge collect my Personal Information

We may collect your personal information in a number of ways, including:

- **Business Contact Personal Information:** Citadel Edge collects your business contact information:
 - when you:
 - submit a support request to our service desks, using our portal or by telephone;
 - request help or information using our online support bots;
 - when you download one of our apps
 - register for or participate in an in-person event or webinar;
 - participate in a contest or promotion;
 - submit your details for SMS or email alerts or notifications related to our products;
 - download a white paper or other materials;
 - agree to be recorded during a telephone conversation or virtual meeting;
 - log in to a website feature or portal;
 - agree to receive regular newsletters about our products and services; and
 - visit a Citadel Edge office or facility.
 - We may also collect your business personal data from:



- publicly-available sources such as the internet and social media sites, and from other parties, such as your employer, personal representatives, and credit reporting agencies;
 - our partners and resellers who market and sell our products; and
 - our related companies.
- **Non-business Personal Information:** Citadel Edge collects your non-business personal information from you when you provide us with a CV or from a third party recruitment agency or platform where you have applied for a role with us, and may supplement this with publicly-available information collected from the internet or social media. We may also collect your personal data when required to do so by law.
- **Technical and Device Information:** Citadel Edge collects your technical and device information when you:
 - visit our websites and social media platforms;
 - log in to a website feature or portal; and
- **Audio and Visual Data:** Citadel Edge collects your audio and visual data when you:
 - attend a Citadel Edge hosted in-person or virtual event;
 - attend a partner-hosted in-person or virtual event;
 - participate in a recorded telephone or conference call conversation;
 - choose to personalize your account with additional information, such as a photo or social media profile
- **Cookies and Analytics Technologies:** Citadel Edge uses cookies and analytics technologies when you:
 - visit our websites and social media platforms;
 - log in to a website feature or portal;

You can opt in or out of the use of cookies by customising your cookie options when visiting our website. If you would prefer not to be tracked, most browsers will allow you to (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether to accept it; (ii) disable existing cookies; or (iii) set your browser to automatically reject cookies. However, doing so may affect how our websites work. For further information regarding Citadel Edge's use of cookies and how to set your cookie preferences, please refer to the Citadel Edge Cookie Policy.

- **Feedback Data:** Citadel Edge will collect your feedback when you:
 - participate in our online community forums and blogs;
 - participate in in-person user groups and product feature launches;
 - respond to Citadel Edge polls and questionnaires;
 - If you interact with Citadel Edge, interact with other users or add your own posts, then Citadel Edge considers your participation and your posts to be freely given, and we may use your feedback without compensation or attribution to you. Citadel Edge is under no obligation to publish, maintain or retain any of your posts.

If you don't provide us with your Personal Information, we may be unable to provide you with our services, or your service provider (our client) may be unable to provide you with their services.

5 How do you use my Personal Information?

We may hold, use and disclose your personal information as requested by, or consented to, by you to:



- provide services to you, your employer or your service provider;
- operate, protect, improve and optimise our website, services, business and our users' experience, such as to perform analytics;
- send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- provide you with information about new services provided by Citadel Edge or its service providers that may be of interest or relevant to your practice or business;
- monitor and keep secure our equipment, intellectual property, physical office locations, websites, accounts on social media platforms and technology assets;
- diagnose and fix problems related to our products;
- maintain endpoint and network security;
- prevent, investigate or provide notice of fraud or unlawful or criminal activity;
- comply with contractual, legal and regulatory obligations;
- carry out a corporate transaction, such as a merger or sale of assets of all or part of our group;
- comply with a subpoena or similar legal process or request;
- protect your safety or the safety of others;
- interact with our professional advisors (such as auditors, insurance companies, financial service providers and lawyers) as reasonably required for us to operate our business;
- inform third parties (including partners and resellers of products) to the extent that you consent to such sharing (where required by applicable law) or expressly direct us to interact with such third parties
- comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties; and
- consider your employment application.

6 To Whom Might You Disclose My Personal Information?

We may disclose your personal information to:

- our employees and those of our related companies;
- third party suppliers and service providers (including providers for the operation of our cloud hosting services, websites and/or our business or in connection with providing our services to you);
- professional advisers, dealers and agents;
- payment systems operators (e.g.: merchants receiving card payments);
- our existing or potential agents, business partners or partners;
- anyone to whom our assets or businesses (or any part of them) are transferred;
- specific third parties authorised by you to receive information held by us; and/or



- other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

7 Our legal basis for processing

If the law requires us to have a legal reason for collecting and using your personal information, such as the European Union or United Kingdom General Data Protection Regulation (either, the **GDPR**), then the reason will depend on the type of information we collect and why we collect it. When you interact with Citadel Edge as a representative of a Client we use your Personal Information either because you gave us permission (where required by law) or because we need it to fulfill an agreement we have with you or your employer.

When you fill out a form to ask about Citadel Edge or one of our products, we use your Personal Information either with your permission (where required by law) or because it's in our legitimate interest to respond to your request, communicate with you and send you information about our products (e.g. via marketing calls or emails, depending on your preferences).

If you sign up for newsletters, white papers, or events, request a product demonstration, download resources or take part in surveys, we use your consent to send you more information about our products that we think might interest you. You can opt out of these communications at any time.

We also rely on your consent when using cookies on our websites. You agree to this when using our sites, although cookie rules can vary based on where you are located.

If we need to use your personal information based on our legitimate interests, we will tell you this when collecting the data. Our legitimate interests include things like running our websites, communicating with you when you ask for information and marketing our products and services.

Sometimes, we also need to process your information to meet legal requirements, like keeping business records or complying with tax laws.

8 Communications and Marketing

We may use your Personal Information to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send or by contacting us.

9 Compliance with Laws

We may disclose your personal information in special situations where we have reason to believe that doing so is necessary to identify, contact or bring legal action against anyone damaging, injuring or interfering (intentionally or unintentionally) with our rights or property, users or anyone else who could be harmed by such activities.

We will disclose your Personal Information where required to do so by law or subpoena or if we believe that such action is necessary to comply with the law and the reasonable requests of law enforcement or to protect the security or integrity of our Service.



10 Maintaining The Security of Your Information

Citadel Edge follows generally-accepted security practices, and uses a variety of physical and electronic security measures, including restricting physical access to our offices, network firewalls, maintaining secure databases and implementing access controls to keep personal information secure from misuse, interference and loss, and unauthorised access, modification or disclosure. We monitor developments in security and encryption technologies as part of its continued data security efforts. However, data security is a shared responsibility, and you acknowledge that the security of data transmitted through the internet can never be guaranteed. You are responsible for maintaining the security of your password or other form of authentication involved in accessing password-protected or secured areas of any Citadel Edge product or portal. Access to and use of password-protected and/or secure areas of any Citadel Edge product or portal is restricted to authorised users only.

11 Will Citadel Transfer My Personal Information Outside Australia?

Subject to any contractual obligations we assume to our Clients, or specific regulatory obligations, Citadel Edge may hold your information on computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

We may disclose your personal information overseas to our service providers who assist us in providing services to you or your employer. If we do so it will be for the purposes of providing services to our Clients and our service providers will be contractually bound to use your information only for the purposes of which it is disclosed.

If you are located outside Australia and choose to provide information to us, please note that we transfer the information, including Personal Information, to Australia and process it there. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

12 Additional Information for EU Residents

If you are a resident in the European Union, and have provided us with your personal information in order for us to provide you with a service, or to carry out an instruction, your personal information will be handled, used and disclosed in accordance with the Australian Privacy Act 1988 (Cth), the Australian Privacy Principles, and this Privacy Policy.

13 Your privacy rights

Subject to the conditions and restrictions set out under applicable law, you may have the following rights:

- You may request access to, and correction or deletion of, your Personal Information;
- You may object to the processing of your personal information, ask us to restrict its processing and request that we provide your personal information to certain third parties;
- You may have the right to complain to Citadel Edge and/or a data protection authority about Citadel Edge's collection and use of your Personal Information



If you have consented to Citadel Edge's collection and use of your Personal Information, you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect the processing of your personal information conducted in reliance on another lawful basis.

If your employer is a Citadel Edge Client, then please contact them directly if you wish to exercise your privacy rights concerning your personal information, which they provide to Citadel Edge to process for them. Under applicable law and the agreements we have in place with our Clients, Citadel Edge cannot respond directly to your request in this event.

You may exercise your privacy rights by emailing your request to privacy@citadeledge.com. When you do so, please provide your complete name and your email address, which we'll use to communicate with you. Citadel Edge will use this information only to verify you and process your request. If you are an authorised agent, then we reserve the right to request you demonstrate evidence of your authorisation, either by providing us with a signed permission form or a copy of your power of attorney granting you such authority.

If you have any questions about this Notice, please contact us at:

The Data Privacy Officer – Citadel Edge
46/600 Bourke Street, Melbourne VIC 3000 Australia
privacy@citadeledge.com

14 Updates to This Notice

We may update this Notice and its effective date at any time to reflect changes to our practices. We encourage you to periodically review this Notice for the latest about our privacy practices.

15 Citadel Edge Companies

Company	Location
Citadel Edge Pty Ltd	Australia
Citadel Edge Technology Solutions Pty Ltd	Australia
Citadel Edge Solutions Pty Ltd	Australia
Citadel Edge IT Services Pty Ltd	Australia
Teknologi Citadel Sdn. Bhd.	Malaysia
Kapish Services Pty Ltd	Australia
Kapish EA Pty Ltd	Australia
Kapish EA Pty Ltd	New Zealand



16 Definitions

Term	Definition
Citadel Edge Company	an entity listed in Section 15 of this policy
Client	a client of a Citadel Edge Company
Personal Information	Information (including Sensitive Information) that identifies an individual or could reasonably identify an individual, including facts and opinions, whether they are true or not. In some jurisdictions, the term 'Personal Data' is used under applicable Privacy Laws, and is defined as ' any information relating to an identified or identifiable (directly or indirectly) individual. In this Policy, where applicable a reference to Personal Information includes a reference to Personal Data.
Sensitive Information	is a category of personal information and specifically refers to information or an opinion about more sensitive things like an individual's racial or ethnic origin, religious beliefs or affiliations, sexual orientation or practices, criminal record, and health information.



Citadel Edge
Level 46 Bourke Place, 600 Bourke Street,
Melbourne VIC 3000 Australia