

Privacy Policy

Dated 1st March 2014

Hazelwood & Hill Pty Ltd respects people's privacy. All our staff are required to read this policy and understand their responsibilities when dealing with personal information.

In this policy

- Personal information refers to any information or any opinion, whether true or not and whether recorded in a material form or not, from which an individual's identity is apparent, or can reasonably be ascertained; and
- sensitive information refers to information about a person's racial or ethnic origin, political opinions or associations, religious beliefs or affiliations, philosophical beliefs, trade and professional memberships, sexual preferences or practices, criminal record or health, genetic or biometric information.

Our Privacy Principles

We are bound by the Australian Privacy Principles (**APPs**) in the *Privacy Act 1988* (Cth) (**Act**). The APPs came into effect on 12 March 2014, when they replaced the National Privacy Principles, which applied previously under the Act. We have adopted internal policies and procedures to ensure that personal information that we collect, store, use and disclose is dealt with in accordance with the APPs. You can see the full text of the APPs online at <http://www.oaic.gov.au/privacy/privacy-act/australian-privacy-principles>.

Collecting personal information

We may need to collect personal information about you and others including names, addresses, phone numbers and other contact details as well as details regarding shareholdings, employment history, bank account details, credit card information and tax file numbers.

We may need to collect personal information so we can:

- identify our clients, potential clients and their representatives;
- provide or offer you products, services or other benefits;
- inform you or others of any initiatives we think may be of interest to you or them;
- conduct our business and provide our products and services in a professional and efficient manner; and
- develop and implement initiatives to improve our products and services.

If we are not provided with all the personal information we request, we may be unable to provide you with credit or do business with you or others.

Unless it is unreasonable or impractical, we will collect personal information directly from the individual concerned. However, an individual's representatives may hold personal information (eg, financial or bank account details or a credit reference) that we may need to access for particular dealings, legal proceedings or other purposes. Where we are at liberty to do so, we will use our best endeavours to seek an individual's consent before obtaining their personal information from third parties.

Personal information may be collected by us:

- when we are contacted about our products or services, in person or over the telephone or internet;
- when you provide us with information by completing various forms including credit applications and credit card payment authorisation forms; and

- when we respond to an inquiry, where we consider personal details are required or appropriate to fulfil the query.

The personal information of our clients and business contacts or their representatives will usually be recorded in hard copy files designated for the purpose for which the personal information was collected and/or updated on our computer database.

Any additional purpose for which the information is collected (not included in this policy) will be identified when we collect the personal information, or as soon as practicable afterwards.

Collecting sensitive information

We may need to collect sensitive information about you or others. Where we are required to and it is practicable to do so, we will seek your consent before collecting your sensitive information and inform you of the purpose of the collection at that time. Your consent to collection of your sensitive information may be implied in limited circumstances.

Use of personal information

We will use personal information:

- to identify individuals and protect them from unauthorised access to their personal information, accounts or services;
- to provide services that we are obliged to provide;
- to improve our services to you or others;
- to inform you or others of our marketing initiatives;
- to derive or aggregate anonymous information from which individuals cannot be identified;
- to prevent or lessen a threat to a person's life or health;
- where disclosure is reasonably necessary for the establishment, exercise or defence of a legal or equitable claim;
- for the purpose for which it was collected, or for a related purpose (or a directly related purpose in the case of sensitive information);
- where the individual concerned would reasonably expect us to use the information;
- for any other purpose, where an individual has consented to its use for that purpose.

Disclosure of information

Except where indicated above, we will not disclose personal information to a third party unless:

- the disclosure is for a primary purpose for which the information was collected;
- the individual concerned has consented to the disclosure;
- the third party is our agent or contractor, in which case we will require them to disclose and to use the personal information only for the purpose for which it was disclosed;
- there are reasonable grounds to believe that disclosure is necessary to prevent or lessen a threat to your life or health or that of another person;
- the disclosure is to a related body corporate;

- the disclosure is reasonably necessary for the establishment, exercise or defence of a legal or equitable claim; or
- the disclosure is permitted, required or authorised by or under law.

Information collected via our website

To ensure we are meeting the needs and requirements of our website users, and to develop our online services, we may collect aggregated information by using cookies. Cookies are unique identification numbers like tags that are placed on the browser of our website users. The cookies do not in themselves identify users personally, but are linked back to a database record about them.

We may use cookies to track use of our website, and to compile statistics on visits to the site in an aggregated form and log anonymous information such as:

- the address of a user's server;
- a user's top level domain (such as .com or .au);
- the date and time of a user's visit;
- the pages a user accessed and downloaded;
- the search engine a user used;
- the type of browser that was used.

When a user visits our site a cookie may be placed on their machine. Where a user has visited us before, the cookies may be read each time they re-visit the site. We do not use this technology to access any other personal information of a user in our records and a user cannot be personally identified from a cookie.

If a user chooses not to have their browser accept cookies from our site, they are still able to view the text on their screens.

Marketing

We may use personal information to advise the individual concerned of new services and marketing initiatives that we think may be of interest to them. Those who prefer not to receive information about our services or seminars can contact our Privacy Officer and request to be removed from the relevant circulation list. Contact details for our Privacy Officer appear at the end of this policy.

We will not disclose personal information to a third party to enable that party to direct market their products or services to an individual, unless that individual has expressly consented to that disclosure. We may require written confirmation of a request to be removed from our circulation list, for example where legislation requires us to provide particular communications to the individual concerned.

Updating your information

We ask that you tell us of any changes to the personal information we hold about you. You may notify our Privacy Officer (whose contact details appear at the end of this policy) at any time to request that your personal information is amended or updated. We will then take reasonable steps to correct the information in the manner requested.

If we consider that the personal information we retain does not require amendment, we will annotate the request on our files.

Security

The protection of personal information is a priority for us.

We are committed to maintaining:

- safeguards to protect personal information against unauthorised use, disclosure, access, interference, modification, destruction and accidental loss. All personal information we hold is dealt with in accordance with the APPs;
- industry standards for the security and protection of information. Personal information is stored securely and access is restricted to authorised personnel only. Our computer systems require access passwords and these are kept secure by our personnel; and
- internal policies on management of personal information and staff training to ensure compliance with these policies. All our staff are required to read this policy and understand their responsibilities regarding personal information.

Destruction of records

We will destroy or de-identify any personal information that we hold which is no longer needed for any purpose permitted by the APPs unless we are required by law to retain such personal information.

Access to personal information

We will generally allow an individual access to any personal information that we hold about them on request - subject to any restrictions on access. We will try to give the individual concerned access in a form and manner that suits their needs. To request such access please contact our Privacy Officer. Contact details for our Privacy Officer appear at the end of this policy.

Restrictions on access

We are entitled to restrict access to personal information in accordance with the APPs. You may not be allowed access to personal information we hold where access would reveal evaluative information generated by us in connection with a commercially sensitive decision-making process. Instead, we may give you an explanation for the decision, rather than direct access to the information.

If we have given you such an explanation and you believe that direct access to the evaluative information is necessary to provide a reasonable explanation of the reasons for the decision, we will, at your request, review the decision. Personnel other than the original decision-maker will conduct the review.

Wherever direct access by you is impractical or inappropriate, we should consider together whether the use of a mutually agreed intermediary would allow sufficient access to meet both our needs and concerns.

Other instances where it may not be appropriate to provide you with access to the personal information we hold, include where:

- providing access would pose a serious and imminent threat to the life or health of any individual;
- providing access would have an unreasonable impact upon the privacy of others;
- the request for access is frivolous or vexatious; or
- the information relates to an anticipated or existing legal dispute and disclosure would compromise our position or the position of others.

Charges for access

An individual will not incur charges for lodging a request to access personal information. However, we may levy a reasonable charge for providing access to that information. We will provide an estimate of any charge on request, or if it appears to us that the work will be onerous or otherwise warrants a charge.

Transferring information overseas

We typically do not transfer personal information to any entity outside Australia. However, in the event that we do disclose information to an overseas recipient, we will take reasonable steps to ensure that the overseas recipient does not breach the APPs in relation to the disclosed personal information unless:

- we reasonably believe that the recipient of the information is subject to legal obligations that uphold principles for the protection and fair handling of personal information that are substantially the same as the APPs;
- we are given consent by the individual concerned to do so, expressly or by implication after they are expressly informed that the Act will not apply in relation to the management of personal information by the overseas recipient and the individual may not be able to seek redress under the Act.
- we are legally authorised or required to do so.

Changes to our policy

We may update or change this policy. When we do so, we will publish the current policy on our website. Please check our website to review this policy regularly.

If you have any suggestions or concerns that are not addressed in this privacy policy, please contact our Privacy Officer. The contact details of the Privacy Officer are listed at the end of this policy.

Complaint resolution

We are committed to constantly improving our procedures so that personal information is treated appropriately.

If you feel that we have failed to deal with your personal information in accordance with the APPs or this policy, please speak to us so that we have an opportunity to resolve the issue to your satisfaction.

The person to contact is our Privacy Officer, whose contact details appear at the end of this policy.

Our Privacy Officer will manage the following process for us to:

- listen to your concerns and grievances regarding our handling of personal information;
- discuss with you the ways in which we can remedy the situation; and
- put in place an action plan to resolve your complaint and improve our information handling procedures (if appropriate).

If this process does not result in an outcome that is satisfactory to you, you may contact the Office of the Australian Information Commissioner's Office. We will work together with the Information Commissioner's Office to resolve the issues between us.

The contact details for the Office of the Australian Information Commissioner's Office are as follows:

Street address: Level 3, 175 Pitt Street, Sydney NSW 2000
Telephone: 1300 363 992 (for the cost of a local call anywhere in Australia)
TTY: 133 677 followed by 1300 363 992
Post: GPO Box 5218, Sydney NSW 2001
Facsimile: +61 2 9284 9666
Email: enquiries@oaic.gov.au

Further information about privacy and your rights can be obtained at the Office of the Australian Information Commissioner's website at www.oaic.gov.au.

Which companies are covered by this Privacy Policy?

Hazelwood & Hill Pty Ltd

Contact information

If you wish to access any personal information that we hold about you, or have a query about this policy, please contact our Privacy Officer:

Privacy Officer
Richard Hill
18 McIntyre St, Burwood Victoria. 3125.
03 9808 5522
Email: richard@hazelwoodhill.com.au