

## **Policy - Privacy and Disclosure**

### **1 THE PRIVACY ACT**

Heggies Pty Ltd is subject to the National Privacy Principles in the Privacy Act 1988. The principles set out in this Privacy Policy and Disclosure Statement apply to any personal information you provide to us via the website or under any agreement or arrangement we may have with you as well as to information which we may collect about you from other sources.

This Privacy Policy and Disclosure Statement does not apply to any acts and practices relating directly to the employee records of any current or former employees of Heggies Pty Ltd.

### **2 COLLECTION OF PERSONAL INFORMATION**

Personal information is usually collected directly from you when you deal with us over the telephone, send correspondence (whether by letter, fax or e-mail), subscribe electronically to our newsletters or other announcements or when you have contact with us in person.

This personal information may include your name, mailing address, telephone number and e-mail address. In some circumstances, we may also collect potentially sensitive personal information such as your areas of interest in our services, the nature of your work and employer type or your membership of professional or industry associations.

Sometimes we may collect personal information about you from a third party. Such sources could include a company for whom you work, other organisations with whom you have any dealings, a credit reporting agency, an information service provider or from a publicly maintained record.

### **3 DISCLOSURE STATEMENT**

Heggies collects personal information for the following purposes to:

- Provide you (as a client) or your organisation with professional advice and other services
- Make offers of employment or for purposes associated with your employment
- Receive services or products from you or your employer
- Advise you of developments within our areas of expertise and service
- Undertake marketing activities associated with the provision or enhancement of our services.

If you do not provide the information requested, we may not be able either to provide you with appropriate professional advice or to fulfill other applicable purposes of collection. If we purposely collect personal information about you from a third party, we will take reasonable steps to contact you and ensure that you are aware of the purposes for which we are collecting your personal information and the organisations to which we might disclose your personal information.

If you are our client or are employed by a client of Heggies Pty Ltd, we may disclose your personal information to other professional disciplines engaged on that client's project. We may also disclose your personal information to our clients where we have collected that information in the course of providing professional services to those clients.

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### **4 USE OR DISCLOSURE OF PERSONAL INFORMATION**

We will use and disclose personal information for the primary purpose for which it was collected. We may also use and disclose personal information for purposes related or ancillary to the main reasons we collect it, such as invoicing, reminder notices and provision of information concerning developments within our areas of expertise or service.

We do not disclose personal information we collect to third parties for purposes other than those described in our Disclosure Statement (including the purpose of allowing them to market their products and services directly to you).

### **5 INFORMATION PROVIDED ABOUT OTHER PEOPLE**

If you provide personal information to us about someone else, you must ensure that you are entitled to disclose that information to us and that, without us taking any further steps required by privacy laws, we may collect, use and disclose such information for the purposes described above.

You should take reasonable steps to ensure the individual concerned is aware of the various matters detailed in this Privacy Policy and Disclosure Statement as those matters relate to that individual, including our identity, how to contact us, our purposes of collection, our information disclosure practices, the individual's right to obtain access to the information and the consequences for the individual if the information is not provided.

### **6 SENSITIVE INFORMATION**

We do not collect sensitive information (personal information about an individual's racial or ethnic origin, political opinions or membership of a political association, religious beliefs or affiliations, membership of a professional or trade association, beliefs, membership of a trade union, sexual preference or practices, criminal record, or health information) without your consent.

### **7 CONFIDENTIALITY AND OBLIGATION OF NON-DISCLOSURE**

We have a duty to maintain the confidentiality of our clients' affairs, including personal information and will not disclose personal information without permission or unless compelled by law.

### **8 GAINING ACCESS TO INFORMATION**

We will, on request, and in a reasonable time, provide you with access to the personal information we hold about you unless there is an exception which applies under the Privacy Act such as where we have a legal duty of confidentiality or non-disclosure as mentioned above. We will provide you with reasons for any refusal to supply you with information and inform you of any exceptions relied upon under the Privacy Act.

### **9 KEEPING PERSONAL INFORMATION UP-TO-DATE**

We take reasonable steps to ensure that your personal information is accurate, complete, and up-to-date whenever we collect or use it. If any of the personal information we hold about you is inaccurate, incomplete or out-of-date, please contact us immediately and we will take reasonable steps to correct this information or, if necessary, we will discuss alternative action with you.

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### **10 SECURITY OF PERSONAL INFORMATION**

Your personal information may be stored either in hard copy documents or as electronic data in our computers or data systems. We take reasonable care to minimise the risk of any misuse or loss of personal information and to protect it from unauthorised access, modification and disclosure. Such care includes physical means of protecting hard copy documents and measures for controlling access to data systems using passwords, firewalls, secure “tunnels” and other data access permission control systems.

### **11 FURTHER INFORMATION**

Enquiries or comments about this policy or its operation should be directed to the General Manger or Managing Director.