

PRIVACY POLICY

Policy Principles

Peak Services is committed to protecting the privacy, security and confidentiality of personal information gathered through conducting our work as a provider of professional and business services.

This statement sets out the Privacy Policy of Peak Services and its related Entities; and the practices that we will follow to respect the privacy of individuals who deal with us ("you"). Our policy is provided in accordance with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles ("APPs") which are set out in that *Act*, and as amended from time to time.

There are thirteen Australian Privacy Principles which apply to personal information of an individual (or which could be used to identify an individual); and Peak Services will comply with all of them. Although information about companies or organisations is not personal information, the protocols we use to collect, store, manage and use information will also apply to information collected on businesses that are sole traders.

Collection of Personal Information

The kinds of personal information which we collect and hold generally includes information such as: name(s), addresses (including email addresses), telephone and facsimile contacts, emergency contacts, occupation and job title, and membership of a professional body or trade union. In addition, from time to time we may collect other information such as: date of birth, gender, education, financial details, and details of spouse, family and next of kin, or social interests.

The information which we collect and hold may come from a number of sources including:

- Potential employees
- Employees
- Independent contractors
- Existing and new contacts and clients of Peak Services
- Other individuals
- In the course of carrying out client engagements.

Some information which we hold may be "Sensitive Information". We will only collect your sensitive information with your consent or if we are required to do so by law. *Sensitive Information* is information or an opinion about an individual's race or ethnic origin, political opinion or membership(s), religious beliefs and affiliations, sexual orientation or practices, health status or criminal record.

We will not collect your personal information unless the information is necessary for, or directly related to, one or more of our functions or activities. We will collect your personal information only by lawful and fair means and not in an unreasonably intrusive way.

Collection and Storage of Personal Information

Whenever we collect and store your personal information, we will take reasonable steps to bring this Privacy Policy statement to your attention (for example, by referring to it in our client contracts or by making it available on our website), and thereby inform you of the following matters:

- Our identity and contact details
- The fact that you are able to gain access to your information and ask us to correct it
- The purposes for which we collect your information
- The intended recipients or organisations to which we may disclose your information
- The fact that you may make a privacy complaint and how we will deal with it
- Any law that requires the particular information to be collected

- The main consequences (if any) for you if all or part of the information is not provided

Where it is reasonable and practical to do so, we will collect your personal information only from you. If, however, we collect this information from someone else, we will act reasonably to ensure that you have been made aware of the matters listed above. Should we receive unsolicited personal information about you, we will within a reasonable period of time, determine whether we could have collected such information in the manner set out in this privacy policy statement above. If so, then our privacy policy will apply to the processing of the information. Otherwise, we will delete such unsolicited information.

Personal information collected from any person or in the course of conducting our professional work will be stored electronically in a secure directory within our IT files. Some records may also be kept in physical form. All records coming under the jurisdiction of this policy are also subject to Peak Services records management system which outlines security, access, retention and disposal procedures and protocols. Only staff who have a legitimate need to know personal information in the course of performing their duties will be provided with access to our confidential information directory or physical files. Our storage devices and technology are highly secured and are resident within Australia.

In addition, our website uses cookies to identify site users and track usage of the site. We also log IP addresses or the location of computers on our website to help diagnose and resolve any problems on our website. By acceptance of the cookie the users will be permitted to access certain parts or pages of our website without having to log in every time. If the user prefers not to accept cookies, they can set their web browser to warn them before accepting, or users can refuse all cookies at their discretion.

Use and Disclosure of Personal Information

The purposes for which we use personal information include the following:

- To respond to requests from individuals
- To consider potential employee's applications for employment with us
- To open and administer our client accounts
- To provide professional services to our clients
- To administer our independent contractors
- For marketing and sales initiatives such as Peak Service publications, information about our service offerings, events, seminars, training courses and business programs. Peak Services will ensure that we provide a simple means by which you may easily request not to receive direct marketing communications from us

If you do not provide us with all or part of your personal information, we may not be able to carry out the purposes which are set out above, including the provision of professional services to you.

As a general rule, we will not use or disclose your personal information other than for its primary purpose of collection, unless you have consented to the use or disclosure; or you would reasonably expect us to use or disclose your non-Sensitive Information for a secondary purpose where the secondary purpose is related to the primary purpose.

However, there may be cases where the use or disclosure is required or authorised by or under law; or we reasonably believe that the use or disclosure is reasonably necessary for a specified purpose by or on behalf of an enforcement body.

We may also disclose your personal information to our service providers who assist us with the provision of client services, administrative support or our general business operations. We remain responsible for maintaining the confidentiality of information which we disclose to our service providers and ensure that contracts with these parties contain terms that confirm personal information is managed according to the same standards which we have implemented within our firm.

Access and Accuracy of Personal Information

Under Australian Privacy Principles, a person has the right to request access to any personal information that we may hold about them and to advise if the information needs correcting. Under certain circumstances we can refuse such requests, [Privacy Principle 12, clause 12.3], and in such circumstances we will provide the person with a written notice that sets out the reasons the request has been refused. Subject to our rights to refuse a request, Peak Services will provide the person with a report that lists all the information that we hold on them.

Peak Services will take all reasonable steps to ensure that any personal information that is collected, used or disclosed is accurate, complete and up to date. If a person believes that any personal information we hold concerning them is inaccurate, incorrect or out of date, they may contact our Privacy Officer [hello@wearepeak.com.au], and once verified, we will update the information concerned.

Under Privacy Principle 2, if an individual prefers not to identify themselves (or prefers to use a pseudonym) in dealing with us concerning privacy matters, Peak Services will do its best to support that request if it is feasible to do so under the circumstances.

Privacy Enquiries

If you wish to make an enquiry about your personal information that may be held by Peak Services or wish to make a complaint because you believe we may have breached our obligations under the *Privacy Act* or associated Australian Privacy Principles, please email our Privacy Officer [hello@wearepeak.com.au] or telephone us on 07 3000 2148. We will respond to all requests within a reasonable time.

External reference bodies

If a person has lodged a complaint with us and is not satisfied with Peak Services response, they may contact the Commonwealth Privacy Commissioner.

Telephone: 1300 363 992; email: enquiries@oaic.gov.au or visit their website: www.oaic.gov.au