



Privacy Policy

Section 1 - Overview

(1) The responsible management of personal information is important to the trust placed in our Organisation by our clients, personnel, business partners and other stakeholders.

(2) This Policy sets out our commitment to respecting individual privacy and managing personal information responsibly, in accordance with applicable legal and contractual obligations and in a manner appropriate to the nature of our business, products and services.

Section 2 - Scope

(3) This Policy applies to Personal Information collected, held, accessed, used, disclosed or otherwise managed by or on behalf of the Organisation.

(4) It includes personal information managed in conducting our business and information entrusted to us in connection with the products and services we provide.

Section 3 - Policy

Privacy Management

(5) We will manage personal information in accordance with applicable privacy legislation, including the Australian Privacy Principles where required by law or contract.

(6) We will maintain privacy practices appropriate to the nature, size, structure and activities of our Organisation, having regard to the information involved, the sectors we serve and the risks associated with its management.

Collection and Use

(7) We collect personal information reasonably necessary to conduct our business, including names, contact details, locations and other relevant information.

(8) We may disclose personal information or provide access to it to contracted service providers where reasonably necessary for them to perform services on our behalf, subject to appropriate confidentiality, security and contractual obligations.

(9) We will not otherwise publish or disclose personal information without consent, unless authorised or required by law.

Client Information

(10) Our products enable clients to collect, manage and publish a wide range of personal information. We will advise clients where information may become publicly accessible, including internationally via the internet. This may include names, positions, contact details, locations and other information relating to individuals identified in our clients'

records.

(11) Clients are responsible for determining what information is published and ensuring they have the authority to do so.

(12) We will access, use or otherwise manage client information only where authorised and reasonably necessary to provide our products and services, fulfil our obligations or meet applicable legal requirements.

Hosting and Access

(13) We will host client information in the location agreed with the client, subject to the applicable Agreement.

(14) We recognise that information hosted in an agreed location may be accessed over the internet from other countries by persons authorised to do so.

(15) Clients are responsible for determining and managing access permissions within their control, including access from overseas locations, and for the subsequent use or disclosure of information by persons they authorise.

(16) We remain responsible for the security and management of Information within our control, in accordance with our legal and contractual obligations.

Analytics and Cookies

(17) We may use cookies, analytics and similar technologies in connection with our websites, products and services to support functionality, understand usage, monitor performance and identify opportunities for improvement.

(18) Our clients may also use these technologies through our products and services for purposes they determine and manage.

(19) We will manage information collected through technologies under our control in accordance with applicable privacy requirements.

Information Protection

(20) We will apply appropriate administrative, physical and technical controls to protect personal information against unauthorised access, use, disclosure, modification, loss or destruction.

(21) Access to personal information will be limited to authorised persons with a legitimate business requirement.

(22) We will retain personal information in accordance with applicable legal, contractual and operational requirements and arrange for its secure disposal when appropriate.

Privacy Enquiries and Concerns

(23) We will provide reasonable means for individuals to request access to, or correction of, personal information for which we are responsible, subject to applicable legal requirements.

(24) Where a request concerns information managed by a client, we will refer the matter to the client or otherwise assist in accordance with our legal and contractual obligations.

(25) Privacy enquiries, requests and complaints may be submitted through the Contact page on our website.

(26) We will assess and respond to privacy concerns and actual or suspected privacy breaches in accordance with our applicable governance documentation and legal obligations.

Section 4 - Procedures

(27) Procedures supporting the implementation of this Policy are documented separately.

Section 5 - Guidelines

(28) Nil.

Section 6 - Definitions

(29) Definitions applicable to this Policy are contained in the Corporate Glossary.

Status and Details

Status	Current
Effective Date	14th October 2026
Review Date	14th April 2029
Approval Authority	Director
Approval Date	14th October 2026
Expiry Date	Not Applicable
Responsible Manager	Joanne Auld Director
Policy Owner	Joanne Auld Director
Author	Joanne Auld Director
Enquiries Contact	Joanne Auld Director

Glossary Terms and Definitions

"Information" - Means knowledge or data, regardless of form or medium, including electronic, physical, verbal or visual information.

"Personal Information" - Means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in material form or otherwise, as defined by applicable privacy legislation.

"Product" - Means any software, platform, module, component, application or other offering developed, licensed, supplied or maintained by the Organisation.

"Service" - Means any activity performed by or on behalf of the Organisation for the benefit of a client or stakeholder, including support, implementation, consulting, hosting, maintenance or managed services.

"Stakeholder" - Means an individual, organisation or other entity that: has a legal, contractual, regulatory or governance relationship with the Organisation; receives, provides or supports the provision of the Organisation's Products, Services or business operations; has rights, information or legitimate interests that the Organisation is responsible for protecting or respecting; or may be directly affected by the Organisation's activities or decisions in a manner recognised by law, contract or the Organisation's governance framework.