

CWCC Privacy Policy

Updated 11 April 2014

Background

CWCC Group Pty Ltd (ABN 94 105 035 274) and its related bodies corporate (**we, us, our**) are committed to protecting your privacy, in accordance with applicable Australian privacy laws. This includes complying with the Australian Privacy Principles (**APPs**) in the *Privacy Act*.

This Policy is designed to give you a greater understanding of how we collect, use, disclose and otherwise handle personal information.

Personal information means information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable.

What we collect

General

The type of personal information that we collect about you depends on the type of dealings you have with us. For example, if:

- **we are providing consulting, advisory or analysis services for a client**, we may collect a range of personal information relevant to the particular project, which may include individuals' names, contact details, dates of birth, job titles, current employment details, pay information and other information relevant to the services we are providing
- **you register for a web-based business service** that we provide (either on behalf of a client or directly), we may collect some or all of the following details: your name, job title, contact details, current employment details and previous education, and we will generate a user-name and password for you so that you can access the relevant web-based business service as an authorised user. We may also collect more detailed information depending on the particular service provided.
- **you participate in a survey or other research services**, we may (unless the survey is completed anonymously) collect information such as your name, job title, contact details, and current employment details.
- **send us an enquiry**, we may collect your name, contact details and details of your enquiry
- **apply for a job with us**, we will collect the information you include in your job application, including your cover letter, resume, contact details and referee reports

Sensitive information

Sensitive information is a subset of personal information that is generally afforded a higher level of privacy protection.

We only collect sensitive information where it is reasonably necessary for our functions or activities and either:

- the individual has consented; or
- we are required or authorised by or under law (including applicable privacy legislation) to do so.

How we collect personal information

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

- in person
- through our websites
- over the telephone
- through written correspondence
- on hard copy forms
- from third parties, including:
 - ▶ our clients (including collecting existing company data relating to staff, payroll, financials or other key data from organisations that engage us to provide services)
 - ▶ third parties contracted by us or our clients to support our web-based business services
 - ▶ from publicly available sources of information, such as business directories

Why we collect personal information

The main purposes for which we collect, hold, use and disclose personal information are:

- to provide our services, whether directly to individuals/organisations or on behalf of a client
- to meet, and to assist our clients in meeting, legislative and regulatory reporting obligations
- to promote our products and services

- to recruit staff and contractors

We may also collect, hold, use and disclose personal information for other purposes explained at the time of collection or:

- which are required or authorised by or under law (including, without limitation, privacy legislation); or
- for which you have provided your consent.

Who we may share your personal information with

We may share your personal information where appropriate for the purposes set out above with entities including:

- in relation to our consulting, advisory and analysis services:
 - ▶ the client and that client's associated entities
 - ▶ third parties contracted by the client
- in relation to our surveys and other research services:
 - ▶ the client (unless we told you that your information would be de-identified, in which case your personal information will not be disclosed to our client without your consent) if applicable
 - ▶ to other third parties indicated at the time of collection
- in relation to our web-based business services:
 - ▶ the client that contracted the web-based business service from us and that client's associated entities (for example, that client's affiliated network)
 - ▶ any third parties contracted by the client/its associated entities or by us to support the web-based business service
 - ▶ other entities advised through the Conditions of Use for the web-based business service that authorised users agree to before accessing the service
- financial institutions for payment processing
- our contracted service providers, including:
 - ▶ information technology and data storage providers
 - ▶ delivery and shipping providers
 - ▶ external business advisers (such as recruitment advisors, accountants, auditors and lawyers)

In each case, we may disclose personal information to the service provider and the service provider may in turn provide us with personal information collected from you in the course of providing the relevant products or services.
- referees whose details are provided to us by job applicants

Direct marketing

We may use your personal information to let you know about relevant products and services that we consider may be of interest to you (including third party products and services), either where we have your express or implied consent, or where we are otherwise permitted by law to do so. We may contact you for these purposes in a variety of ways, including by mail, email, SMS and telephone.

Opting out

Where you have consented to receiving marketing communications from us, your consent will remain current until you advise us otherwise. However, you can opt out at any time, by:

- contacting us (see our contact details below)
- using the unsubscribe facility that we include in our commercial electronic messages (such as email and SMS)

Cross border disclosure of personal information

We do not currently disclose personal information to third parties located overseas. If this changes at some time in the future, we will comply with the requirements of the Privacy Act that apply to cross border disclosures of personal information and this Privacy Policy will be amended accordingly.

We have no control over whether our clients or their associated entities disclose personal information to overseas third parties. We encourage you to read the relevant organisation's privacy policy if you would like more information about their practices in this regard.

Privacy and website visit information

We operate a number of websites, including our corporate website at cwcc.com.au and other sites, including those through which we conduct surveys and provide our web-based business services.

When you visit our websites, some of the information that is collected about your visit is not personal information, as it does not reveal your identity. However, if you have logged into one of our websites the site visit information may identify you, as explained below.

Cookies

When you visit our sites we may collect information including your server address, date and time of the visit and type of device, browser and operating system used.

This information may be collected using cookies (involving data sent to your web browser), which generally allow the site to interact more efficiently with your computer. If you disable the use of cookies, your use of our site may be affected.

In general, this information is used and disclosed by us in anonymous, aggregated form only, for purposes including statistical analysis and to assist us to improve the functionality and usability of our websites.

If you are an authorised user of one of our web-based business services, and have logged into the relevant website using your user ID and password, the cookies used on our website may be able to identify you for that session. However, cookies are discarded when the session ends.

We reserve the right to use or disclose this information to try to locate an individual where we reasonably believe that the individual may have engaged in any unlawful or inappropriate activity in connection with our websites, or where we are otherwise required or authorised by law to do so.

Data quality and security

General

We hold personal information in a number of ways, including in hard copy documents, electronic databases, email contact lists, and in paper files held in drawers and cabinets. Paper files may also be archived in boxes and stored offsite in secure facilities. We take reasonable steps to:

- make sure that the personal information that we collect, use and disclose is accurate, up to date and complete and (in the case of use and disclosure) relevant;
- protect the personal information that we hold from misuse, interference and loss and from unauthorised access, modification or disclosure; and
- destroy or permanently de-identify personal information that is no longer needed for any purpose that is permitted by the APPs.

You can help us keep your information up to date, by letting us know about any changes to your details, such as your address, email address or phone number.

Security

The steps we take to secure the personal information we hold include website protection measures (such as firewalls and anti-virus software), security restrictions on access to our computer systems (such as login and password protection), controlled access to our corporate premises, policies on document storage and security, personnel security, staff training and workplace policies.

Website security

While we strive to protect the personal information and privacy of users of our websites, we cannot guarantee the security of any information that you disclose online and you disclose that information at your own risk. If you are concerned about sending your information over the internet, you can contact us by telephone or post (see our contact details below).

If you are an authorised user of our websites, you can also help to protect the privacy of your personal information by maintaining the confidentiality of your user ID and password and by ensuring that you log out of the website when you have finished using it. In addition, if you become aware of any security breach, please let us know as soon as possible.

Third party websites

Any links to third party websites that are not operated or controlled by us are provided for your convenience. We are not responsible for the privacy or security practices of those websites, which are not covered by this Privacy Policy. Third party websites should have their own privacy and security policies, which we encourage you to read before supplying any personal information to them.

Access and Correction

Please contact us (see our contact details below) if you would like to access or correct the personal information that we hold about you. We may require you to verify your identity before processing any access or correction requests, to make sure that the personal information we hold is properly protected.

We will generally provide you with access to your personal information, subject to some exceptions permitted by law. We will also generally provide access in the manner that you have requested (e.g., by providing photocopies or allowing a file to be viewed), provided it is reasonable and practicable for us to do so. We may however charge a fee to cover our reasonable costs of locating the information and providing it to you.

If you ask us to correct personal information that we hold about you, or if we are satisfied that the personal information we hold is inaccurate, out of date, incomplete, irrelevant or misleading, we will take reasonable steps to correct that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up-to-date, complete, relevant and not misleading.

Except in the case of more complicated requests, we will endeavour to respond to access and correction requests within 30 days.

Complaints

If you have a complaint about how we have collected or handled your personal information, please contact us (see our contact details below). Complaints must be in writing.

We will endeavour to complete our investigation into your complaint in a timely manner. This may include, for example, asking you for additional details, gathering the relevant facts, locating and reviewing documents and speaking to relevant individuals.

In most cases, we expect that complaints will be investigated and a response provided within 30 days of receipt of your complaint. If the matter is more complex and our investigation may take longer, we will write and let you know.

If you are not satisfied with our response, you can refer your complaint to the Office of the Australian Information Commissioner.

Our contact details

Please contact us if you have any queries about the personal information that we hold about you or the way we handle that personal information.

Mail: CWCC, Level 5, 121 Flinders Lane, Melbourne, Victoria, 3000, Australia

Email: privacy@cwcc.com.au

Telephone: (03) 8656 1600

Changes to this Policy

We may amend this Privacy Policy from time to time. The current version will be posted on our corporate website at cwcc.com.au and a copy may be obtained by contacting us (details above).