

Privacy Policy

This Privacy Policy sets out how we comply with the *Privacy Act 1988* (Cth), including the Australian Privacy Principles which regulate how we collect, use, disclose and store your Information.

DEFINITIONS

1. APPs means the Australian Privacy Principles introduced under the *Privacy Act 1988* (Cth).
2. Information means Personal Information, Sensitive Information and Credit Related Information.
3. Personal Information means information or an opinion about an identified individual or an individual who is reasonably identifiable;
whether the information or opinion is true or not; and
whether the information or opinion is recorded in a material form or not.
4. Privacy Act means the *Privacy Act 1988* (Cth) as amended from time to time;
Sensitive Information is defined in the Privacy Act to include such things as race, sexual orientation, political opinions, membership of trade associations or unions, criminal record or health information; and
Social Media Applications means blogs, social media applications or services that allow you to share content with other users.

THE TYPE OF INFORMATION WE COLLECT

Personal Information

Personal Information that we collect, and hold is information that is reasonably necessary for us to provide our specialist services. While the type of Personal Information we collect and hold may vary depending on the nature of our interactions with you, it will generally include the following:

- your name and address;
- telephone numbers;
- email addresses;
- your occupation;
- your employer;

Sensitive Information

We may at times, subject to this Policy, also collect and hold Sensitive Information.

COLLECTION

We collect Information only by fair and lawful means where it is reasonable and practicable to do so. If you do not provide us with Information we reasonably request, we may not be able to provide services to you. We also may not be able to provide you with the information about the services that you may want.

Information provided by you

We collect Information that you provide to us:

- in person or during a telephone call with our team;
- in written correspondence (including email);
- when subscribing to email alerts offered by us;
- when visiting our website at www.nuffieldgroup.com; and
- through transactions conducted with us.

Information collected from other sources

We may collect Information provided by third parties when it is necessary for a specific purpose, such as checking Information you have given us or where you have consented or would reasonably expect us to collect your Information in this way. If we are not sure whether you have consented to collection of Information from a third party, we will take reasonable steps to contact you to ensure that you are aware of the reason and purpose of the collection.

If we collect Information from a third party, if it is reasonably possible we will inform you that the Information has been collected and the circumstances of the collection.

We will collect Information about you if we are required to do so under an Australian law. If so, we will inform you of this, including identifying the law requiring the collection.

We may collect Information about you from a range of publicly available sources including newspapers, journals, directories, the internet and social media sites.

Internet usage

We may use cookies when you visit our website and as a result we may collect certain Information from you such as:

- your IP address;
- the date and time of your visit;
- information about your past internet usage such as websites you visit before coming to our website;
- any documents you download from our website; and
- the type of device, browser and operating system you used when accessing our website.

Our website may host or link to Social Media Applications. Any Information that you contribute to Social Media Applications can be read, collected and used by other users over whom we have little or no control. Therefore, we are not responsible for any other user's use, misuse or appropriation of any Information that you contribute to any Social Media Application

Unsolicited Information

If we receive unsolicited Information about you, we will check whether that Information is reasonably necessary for our functions or services. If it is, we will handle this Information in the same way we do any other Information that we seek from you. If not, we will destroy or de-identify it.

REASON FOR COLLECTION

Personal Information

We may use and disclose your Personal Information for the primary purpose for which it is collected, for reasonably expected secondary purposes which are related to the primary purpose and in other circumstances authorised by the Privacy Act. In general, we use and disclose your Personal Information to:

- conduct our business;
- provide our professional services to you;
- market and promote our services;
- communicate with you and assist you with enquiries;
- comply with our legal obligations;
- help us manage and enhance our services;
- gain an understanding of your needs; and
- establish an account for you.

Sensitive Information

We will not collect Sensitive Information about you unless:

- we obtain your explicit consent to collect and use such Sensitive Information;
- the Sensitive Information is reasonably necessary for one or more of our services;
- the collection of the Sensitive Information is required or authorised by or under Australian Law;
- a permitted general situation exists in relation to the collection of the Sensitive Information by us; and
- a permitted health situation exists in relation to the collection of Sensitive Information by us.

MARKETING

We may use and/or disclose your Information in order to:

- provide you with news and information about our services;
- provide you with marketing and promotional material that we believe you may be interested in; or
- seek your feedback on our services.

Only with your express consent will we use or disclose Information for the purposes of direct marketing. We will not sell your Information.

SECURITY & MANAGEMENT

We take reasonable steps to protect your Information against misuse, interference, loss, unauthorised access, modification and disclosure. The protective steps we take include:

- confidentiality requirements of our employees and contractors;
- limiting access to Information to employees who have a need to use the Information;
- document storage security policies; and
- security measures for restricted access to our systems.

CORRECTION

We aim to ensure that the Information we hold is accurate, complete and up to date. We encourage you to contact us to update any Information we hold about you.

If you contact us regarding an apparent inaccuracy in relation to your Information and we are satisfied that the Information is inaccurate, out of date or incomplete then we will take reasonable steps to correct the Information within 30 days.

If we determine that a correction is not required we will provide you with written notice stating the reasons why the correction was not made and refer you to our complaints procedure.

ACCESS TO YOUR INFORMATION

You are entitled to access your Information held by us.

If you wish to do so, you must lodge a request for access by contacting us at nuffield@nuffieldgroup.com or by post to PO Box 6292 Melbourne VIC 8008.

We may charge you a fee to cover our reasonable costs in meeting an access request. You will be provided with access to your Information within 30 days of the request unless unusual circumstances apply.

We are not required to give you access to your Information if it would be unlawful to do so, or denial of access is authorised or required by an Australian law, court or tribunal order. If we do not give you access to your Information you will receive written notice that explains the reasons for the refusal.

COMPLAINTS

Complaints about this Policy or our compliance with the Privacy Act can be made by contacting us at Nuffield@nuffieldgroup.com or by post to PO Box 6292 Melbourne VIC 8008. If you do not consider that your complaint has been adequately addressed by us, you may make a further complaint to the Office of the Australian Information Commissioner.

UPDATES TO THIS POLICY

This Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and services and the changing business environment.

The most current version of this Policy will be uploaded to our website at www.nuffieldgroup.com or can be obtained by contacting us on 1300 308 257.