



## Privacy Policy

This policy outlines J. Wyndham Prince's commitment to the handling of personal information it collects about individuals including clients and potential clients.

We respect the confidentiality of your information and take your privacy seriously. We are bound by the Privacy Act 1988 (Cth) (the Privacy Act) and will protect your personal information in accordance with the Australian Privacy Principles. These principles govern how we can collect, use, hold and disclose your personal information.

### What is personal information?

Personal information includes any information or opinion about an identified individual, or an individual who can be reasonably identified from their information. The information or opinion will still be personal information whether it is true or not and regardless of whether we have kept a record of it.

The information that we seek to collect about you will depend on the products or services that we provide. If you do not allow us to collect all of the information we request, we may not be able to deliver products and services effectively.

### What personal information do we collect and hold?

The nature and extent of personal information that we collect varies depending on an individual's interaction with us. Generally, we collect information that is necessary to be able to provide you with products or services that you have requested and where you have consented to that collection. For instance, we may ask for identification information such as your name and contact details, etc.

From time-to-time, we may also collect personal information of a particularly sensitive nature. This includes information about your religion, racial or ethnic origin, health information, sexual orientation, etc. Generally, we only collect this sort of information for employment purposes. Unless otherwise directed by law, we will not collect, hold, use or disclose your sensitive information without your consent.

### For what purposes do we collect, hold, use and disclose personal information?

We use the personal information you provide only for purposes consistent with the reason you provided it, or for a directly related purpose. We also use personal information to carry out our internal administrative operations, or to enhance or improve our products and services to you and other clients in the future. We may also use your personal information when required or permitted by law.

### How we collect personal information?

Generally, we will collect personal information directly from you or electronically. For instance when you visit our website, when you provide us with your business card, when you engage us for a product or service or when you commence employment with us, etc.

If you would like to access any of our products and services on an anonymous basis or if you would prefer to use a pseudonym, please tell us. However, we will require you to identify yourself if we are required by law or it is impracticable for us to deal with you if you do not identify yourself or elect to use a pseudonym.

In some situations, we may obtain personal information about you from a third party source. If we collect information about you in this way, we will take reasonable steps to advise you of the purposes for which we are collecting your personal information and the organisations to which we may disclose your information.

If we receive unsolicited personal information about you that we could not have collected in accordance with this policy and the Privacy Act, we will take reasonable steps to de-identify or destroy such information within a reasonable period.

When you access our website a small summary file containing a unique ID number called a 'cookie' may be sent to your computer. Any information collected will be used internally for statistical and research purposes only. We may also log IP addresses to analyse trends, administer the website, track users movements, and gather broad demographic information.

### How do we hold personal information?

Much of the information we hold about you will be stored electronically in secure servers located in Australia. Some information we hold about you will be stored in paper files.

We are committed to safeguarding all personal information ensuring it remains confidential and secure. We use a range of physical and electronic security measures to protect the security of the personal information we hold.

We restrict access to personal information to workers and third parties who need to know that information for the purposes set out in this policy.

We take reasonable steps to destroy or permanently de-identify any personal information after it can no longer be used.

**Who do we disclose your personal information to, and why?**

For the purposes referred to in this policy we may disclose your personal information to workers and other parties, including our service providers, professional advisors, workers/contractors, other third parties with whom we have a commercial relationship. We will not rent or sell personal information to others.

We will only disclose your personal information:

- in accordance with this policy and applicable privacy legislation
- for another purpose, which is related to the original purpose for which the information was collected, if we get your consent.
- we are required or authorised by law or where we have a public duty to do so.

It is unlikely that we will disclose personal information to overseas recipients. If however, we were to do so, we will take reasonable steps to ensure that such recipients do not breach the Privacy Act and the Australian Privacy Principles.

**Direct marketing**

We will use your personal information to offer you products and services we believe may interest you, but we will not do so if you tell us not to. We do not provide your personal information to other organisations for the purposes of direct marketing. If you do not want to receive marketing offers from us, please contact the Privacy Officer.

**Access to personal information**

You can request access to the personal information we hold about you. You can also ask for corrections to be made. To do so, please contact the Privacy Officer.

There are some circumstances in which we are not required to give you access to your personal information. If we refuse to give you access to, or to correct your personal information, we will give you a notice explaining our reasons except where it would be unreasonable to do so.

If we refuse your request to correct your personal information, you also have the right to request that a statement be associated with your personal information noting that you disagree with its accuracy.

**Resolving your privacy concerns and complaints**

If you are concerned about how your personal information is being handled or if you have a complaint about a breach by us of the Australian Privacy Principles, please contact our Privacy Officer:

*Privacy Officer (Executive Manager – Corporate Services)*

*J. Wyndham Prince Pty Ltd*

*PO Box 4366*

*Penrith Westfield NSW 2750*

*Phone: 02 4720 3300*

*Email: [jwp@jwprince.com.au](mailto:jwp@jwprince.com.au)*

Complaints must be lodged in writing to the Privacy Officer within 12 months of the date of the alleged breach. We strive to resolve complaints within 30 business days. If your complaint is taking longer, we will let you know what is happening and a date by which you can reasonably expect a response.

If you are unhappy with our response, you can contact the Office of the Australian Information Commissioner.

*Commissioner*

*Office of the Australian Information Commissioner*

*GPO Box 5218*

*Sydney NSW 2001*

*Phone: 1300 363 992*

*Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)*

**Variations**

J. Wyndham Prince reserves the right to vary, replace or terminate this policy at its discretion.

**Version history**

Issue	Revision Description	By (Initials)	Checked (Initials)	Date approved by Board of Directors
A	Original	GB/MW	GB	PJM 13/07/15