

Clemenger Group Limited – Privacy Policy

Clemenger Group Limited (ABN 98 004 882 928) and its related group of companies and associated bodies corporate (**us, we, our**) maintain a policy of strict confidence concerning your (**you, your**) personal information (**Privacy Policy**).

This Privacy Policy has been developed in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**). This Policy applies to the collection, storage, use and dissemination of your personal information. By accessing this site <http://www.clemenger.com.au/> or any site of our group of companies (**Site**) or otherwise transacting with us you accept the terms of this Privacy Policy. This Privacy Policy applies to information provided to us whether via the Site or any other means.

1. Collecting personal information

- 1.1 We will generally collect personal information directly from you, unless it is unreasonable or impracticable to do so. We may also collect personal information from third parties such as your representatives or external data suppliers. When we have collected personal information about you, we will notify you at the point of collection, or as soon as practicable, to ensure that you are aware of such collection and its purpose.
- 1.2 If someone other than you provides us with personal information about you that we did not ask for and we determine that we could have collected this information from you had we asked for it, we will notify you as soon as practicable. However, this notice will not be provided if doing so would be a breach of an obligation of confidence. If we could not have collected this personal information, we will lawfully de-identify or destroy the personal information.
- 1.3 We will only collect sensitive information revealing your race, ethnic origin, political opinions, religious or philosophical beliefs, trade union memberships or details of health or disability if:
 - you have given express consent to us to do so and the information is reasonably necessary for us to carry out our functions or activities; or
 - the use of information is:
 - required or authorised under Australian law or a court or tribunal order;
 - necessary for the establishment, exercise or defence of a legal claim;
 - necessary for lessening or preventing a serious threat to health or safety;
 - necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct;
 - for a diplomatic or consular function or activity or certain Defence Force activities outside Australia; or
 - used in relation to confidential alternative dispute resolution process.

2. Cookies

- 2.1 When you visit the Site the server may attach a “cookie” to your computer’s memory. A “cookie” assists us to store information on how visitors to the Site use it and the pages that may be of most interest. If you choose, you are able to configure your computer so that it disables “cookies” or does not accept them.

2.2 Our servers may record other information about or relating to you, such as the time and date of your visit or the IP address assigned to the computer you are using to access the Site. In many cases, we cannot and do not use this information to identify you personally. Rather, we simply use this information for the operation of the Site, to maintain quality of the Site, and to provide general statistics regarding the use of the Site.

3. Use and disclosure of information

3.1 Your personal information may be used by us in a number of ways, including to:

- provide the products and services offered on the Site and in any other forum to you;
- enhance and improve your use of the Site and our products and services;
- respond to any questions, comments or queries submitted on the Site or by any other means;
- disperse marketing materials and keep you informed about new products, initiatives and opportunities;
- for internal business purposes, for example, to research and develop the Site and our other products and services; and
- as required or authorised by law, including under the Australian Privacy Principles.

3.2 We will not disclose information that personally identifies you to any third party other than as set out in this Privacy Policy. In order to deliver the products and services, we may disclose your personal information to other organisations but only in relation to providing our services to you. This disclosure may include providing your personal information to our clients in order to provide the products and services as agreed upon by you and them. We take reasonable steps to ensure that these organisations are bound by privacy obligations in relation to the protection of your personal information.

4. Direct marketing

4.1 We may use personal information about you for the primary purpose of providing you with our services. We may also use it for other purposes for which you might reasonably expect us to use that information. This includes sending you information about new developments, products, services and special offers by post, telephone or any form of electronic communication. We may also contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases your personal information is not transferred to the third party. You authorise us to use any email address or other contact information you provide to use at any time for such above purposes.

4.2 You agree and acknowledge that even if you opt out of receiving marketing material, we will still send you essential information that we are required to send you relating to the services we provide.

5. Accuracy of your information

We take reasonable steps to ensure that the personal information held by us is accurate, complete and up to date. If you believe that any of your personal information is inaccurate, please contact us and we will take reasonable steps to correct it.

6. Third parties and your information

- 6.1 We will only collect, store, use or disseminate information that personally identifies you as set out in this Privacy Policy unless we are required by law to protect our rights or property (or those of any third party) or to avoid injury to any person.
- 6.2 This Site may link directly to website operated by third parties (**Linked Sites**). You acknowledge that Linked Sites are not operated by us. We encourage you to always read the applicable privacy policy of any Linked Site. We are not responsible for the content or practices of the Linked Sites or their privacy policies regarding the collection, storage, use and dissemination of your personal information.

7. Transfer of information overseas

We may send your personal information to overseas companies. If we do send your information, we will ensure that the recipient company is subject to a law or scheme that protects your information in a way that is substantially similar to our privacy policy and Australian law. Alternatively, if the overseas recipient does not operate in a country with similar privacy laws, you consent to this disclosure.

We use third party service providers who may disclose your personal information to parties in foreign countries. By providing personal information to us you consent to this disclosure.

8. Your consent

By your use of the Site and our services, you consent to the collection, storage, use and dissemination of your personal information in accordance with this Privacy Policy and as otherwise permitted under the Privacy Act.

9. Storage and Security

- 9.1 We will use all reasonable endeavours to keep your personal information in a secure environment, however this security cannot be guaranteed. Our procedures are designed to prevent your personal information being accessed by unauthorised personnel, lost or misused. If you reasonably believe that there has been unauthorised use or disclosure of your personal information please contact us (see below).
- 9.2 If we no longer need your personal information, unless we are required under Australian law or a court or tribunal order to retain it, we will take reasonable steps to destroy or securely delete your personal information in accordance with our document retention policy.

10. Variation and consent to variation

We may vary the terms of this Privacy Policy at any time. You should check this Privacy Policy so that you are aware of any variations made to this Privacy Policy. You will be deemed to have consented to such variations by your continued use of the Site or our services following such changes being made.

11. Access to information we hold about you

- 11.1 If you have any questions, or if you wish to receive more information on our information practices and Privacy Policy, please contact our Privacy Officer.

11.2 If you request access to the personal information we hold about you, we will respond to your request within a reasonable period of time and, where reasonable and practicable, give access to the information in the manner you request. This will be subject to any exemptions allowed under the Privacy Act. You may request this information by writing to our Privacy Officer:

Adrian Ciabotti

Clemenger Group Limited

474 St Kilda Road, Melbourne, Victoria

We may charge a reasonable fee for providing that information.

11.3 When contacting us, you have the option to either not identify yourself or to use a pseudonym. However, this will not apply if it is impracticable for us to communicate with you that way or if we are required or authorised under Australia law (or a court or tribunal order) to only deal with individuals who have identified themselves.

11.4 If you believe your privacy has been breached please contact our Privacy Officer.