

## KEEPING CLIENTS PTY LTD

### PRIVACY POLICY

This website: [www.keepingclients.com.au](http://www.keepingclients.com.au) ('Website') is owned and operated Keeping Clients Pty Ltd ABN: 55 614 372 495 ('we', 'us' or 'our').

#### 1. WE RESPECT YOUR PRIVACY

1.1 Your privacy is important to us and we are committed to protecting your Personal Information. For that reason, you should ensure that you read this Privacy Policy carefully. If you have any questions you can contact us using the details in the Contact section below.

1.2 In this Privacy Policy:

(a) 'You' or 'your' means all users and visitors to this Website and all individuals we interact with in the conduct of our business, including but not limited to our customers, our customers' customers, employees, prospective employees, business contacts and third-party service providers.

(b) 'Personal Information' means information or an opinion about an identified individual, or an individual who is reasonably identifiable, as defined in the Privacy Act 1988 (Cth) ('Privacy Act').

#### 2. OVERVIEW

2.1 This Privacy Policy sets out the basis on which we collect, use, store and disclose your Personal Information and your rights to access the Personal Information we collect and store about you, and how you can contact us about our privacy practices.

2.2 This Privacy Policy supports the Australian Privacy Principles contained in the Privacy Act. It outlines our approach to privacy and how we endeavour to protect your Personal Information.

2.3 This Privacy Policy applies when you visit, browse, access or use products, services, resources, benefits, features, contact/request forms or functions offered on this Website, and in relation to Personal Information we may otherwise collect when you interact with us in the conduct of our business.

2.4 By visiting, browsing, accessing or using the products, services, resources, benefits, features, contact/request forms or functions offered on this Website, or when you otherwise interact with us in the conduct of our business, you indicate that you have read, understood and accept this Privacy Policy and you agree to abide by it.

2.5 You also consent to the collection, use, storage and disclosure of your Personal Information as detailed in this Privacy Policy. You do not have to consent to us collecting, using, storing and disclosing your Personal Information, however if you do not do so, or if your Personal Information cannot be verified, we may not be able to provide you with the products, services, resources, benefits or features you have requested, engage or do business with you, or provide you with a personalised experience on this Website.

### **3. WHAT PERSONAL INFORMATION WE COLLECT**

3.1 The type of Personal Information we collect from you depends on the context in which you interact with us. Personal Information we collect may include your:

- (a) Full name, date of birth, address(es), telephone number(s), electronic address(es) and other contact details.
- (b) Business name, ABN and ACN.
- (c) Verification of identity details such as a copy of and details contained on your driver licence, passport, credit card and other identification information or documents.
- (d) Communications, enquiries or interactions with us.
- (e) Employment and professional background such as employer, occupation, role or position, qualifications, training records, licences and tax file number.
- (f) Any other information you supply to us.

3.2 We collect sensitive information in accordance with the Privacy Act, but only if you agree to provide it to us. For example, if you apply for employment with us, we may require you to provide us with a National Police Check.

3.3 We may collect information about your use and interaction with this Website to protect you from fraudulent activities and to prevent your Personal Information being exploited.

Accordingly, we may collect technical information from your computer, mobile, tablet or other device/technology to identify any malicious, fraudulent, illegitimate or illegal activities.

3.4 On occasion, you may provide us with, and we may collect from you, Personal Information relating to a third-party, such as in providing us details of references for employment purposes. In such cases, it is your responsibility to ensure those individuals are aware of, read, understand and accept this Privacy Policy.

### **4. HOW WE COLLECT PERSONAL INFORMATION**

4.1 We collect Personal Information from you using lawful and fair means. Personal Information we collect from you directly, includes when you:

- (a) Interact with us in the conduct of our business.
- (b) Visit, browse, access or use the products, services, resources, benefits, features, contact/request forms or functions offered on this Website.
- (c) Submit your Personal Information on this Website.
- (d) Sign up to our marketing communications.
- (e) Contact us by telephone, email, mail or in person.
- (f) Interact with us, our third-party service providers or suppliers in any manner relating to the conduct of our business.
- (g) Are employed or apply for employment with us.

4.2 We may obtain Personal Information about you from our customers' customers, related companies, credit reporting bodies, identity verification services, publicly or commercially available sources, trade/business references, your business banker, your accountant, employment references and other third-parties, for the purpose of conducting business with you or complying with applicable laws.

4.3 If you are employed or apply for employment with us, we may obtain Personal Information about you directly or from third-parties such as recruitment agencies, employment agencies and references.

## 5. HOW WE USE PERSONAL INFORMATION

5.1 We use Personal Information to:

- (a) Supply you with products, services, resources, benefits or features you have requested.
- (b) Identify customers and provide you with personalised service support, and process returns.
- (c) Communicate with you regarding products, services, resources, benefits or features you have requested.
- (d) Contact you by telephone, email messaging, mobile messaging (SMS/MMS), social media, mail or any other forms of contact you supply to us.
- (e) Carry out accounting, billing and administrative functions.
- (f) Process authorised financial transactions.
- (g) Resolve disputes and troubleshoot problems on this Website.
- (h) Deliver targeted marketing communications about our products, services, resources, benefits, or features including direct marketing.
- (i) Invite you to participate in our events or surveys.
- (j) Notify you of service, security, privacy and other updates relating to this Website.
- (k) Manage, support, improve or develop our business.
- (l) Assess applications for employment with us.
- (m) Develop and train our employees.
- (n) Monitor, measure and improve satisfaction of our services.
- (o) Measure activity, improve and develop this Website.
- (p) Facilitate the process involved in enabling a sale or merger, if we are sold to or merges with another company.
- (q) Conduct fraud monitoring, detection and prevention activities.
- (r) Satisfy our legal and regulatory obligations, including with our third-party service providers and suppliers.
- (s) Protect our lawful interests, investigate and prevent potentially illegal activities.
- (t) Comply with applicable laws.
- (u) Pursue our legitimate business interests and as is reasonably necessary in the conduct of our business.

5.2 We do not buy, sell or deal in Personal Information.

## 6. HOW WE STORE AND PROTECT PERSONAL INFORMATION

6.1 We store Personal Information in both paper form and electronic form on our internal database, which is held on our online server.

6.2 Your Personal Information is subject to access controls. Our authorised administrator users have full access to Personal Information. All our other employees and third-party service providers have restricted access to Personal Information, limited to a need-to-know basis depending on the function or job they perform and the services they provide and are obliged to treat information held by us with strict confidentiality.

6.3 We may combine or link Personal Information we already hold about you to other Personal Information we collect about you.

6.4 We take reasonable physical, technical and administrative safeguards to store your Personal Information safely and protect it from misuse, interference, loss, unauthorised access, modification or disclosure. Examples include: all access to our online server is encrypted in transmission by electronic security technologies; monitoring our employees' access to Personal Information; and auditing our third-party service providers to ensure their access to Personal Information is limited to a need-to-know basis depending on the function or job they perform.

6.5 We retain your Personal Information if we are providing you with products, services, resources, benefits or features. We may retain your Personal Information after we cease providing you with our products, services, resources, benefits or features for the purposes of complying with legal, taxation, accounting and financial reporting requirements and for monitoring, detecting and preventing fraudulent or illegal activities. We retain data in line with limitation periods and obligations required by applicable laws. If your Personal Information is no longer required, we take reasonable steps to ensure it is not compromised. In such circumstances, we securely destroy or permanently de-identify your Personal Information, unless we are required to retain the information under applicable laws.

6.6 No data transmission or storage system is guaranteed as entirely secure. Irrespective of our reasonable precautions to protect your Personal Information, we cannot take responsibility or guarantee the security of any Personal Information you send to or receive from us. We are not liable for any misuse, interference, loss, unauthorised access, modification or disclosure of your Personal Information. Any Personal Information you transmit to us is at your own risk.

## 7. HOW WE DISCLOSE PERSONAL INFORMATION

7.1 We will only disclose Personal Information as outlined in this Privacy Policy or as otherwise notified to you at the time of collection. We may share Personal Information with:

- (a) Our related companies, employees, third-party service providers and employees of our third-party service providers.
- (b) Our service providers, suppliers and professional advisors who assist in the conduct of our business, such as development or hosting of this Website, credit reporting, fraud prevention, identity verification, marketing and promotion, market research, statistics and analytics, customer service, debt recovery, legal, accounting, auditing, business consulting or technology services.
- (c) References you have nominated when applying for employment with us.
- (d) A company intending to acquire, invest or merge with us.
- (e) Other parties where you have provided your express consent or direction.

7.2 We will disclose Personal Information to law enforcement, government authorities or other third-parties, as authorised by applicable laws or in circumstances permitted by the Privacy Act. For example: in response to a subpoena, court order, or other legal obligation; where we have reasonable grounds to suspect unlawful activity or misconduct of a serious nature is being, or may be engaged in; or where we reasonably believe that disclosure is necessary to prevent fraudulent or illegal activities relating to our products, services, resources, benefits or features.

## **8. COOKIES**

8.1 We use cookies to improve and personalise your experience on this Website and provide you with a better service. Cookies are an industry standard and used by most websites. Cookies make this Website more user friendly by allowing our web applications to customise their operations to you. Cookies store information about your preferences and do not personally identify you as the user.

8.2 Most web browsers are set up to automatically accept cookies. Cookies can be managed by accessing the settings in your browser. You can set your browser to refuse cookies, unless cookies are needed to safeguard this Website or to prevent fraudulent activities. However, if you refuse cookies you may be prevented from taking full advantage of this Website and we may not be able to provide you with the products, services, resources, benefits or features you have requested.

8.3 By visiting, browsing, accessing or using the features, contact/request forms or functions offered on this Website and agreeing to this Privacy Policy, you consent to us placing and storing cookies on your browser for the purposes outlined in this Privacy Policy.

## **9. LINKS TO EXTERNAL WEBSITES**

9.1 This Website may contain links to external websites. These external websites are not in our control and are not subject to this Privacy Policy. We are not responsible for Personal Information you may provide whilst visiting external websites. We strongly recommend that you make your own enquiries as to the privacy policy and terms of external websites.

9.2 This Website may link to social media sites. If you choose to 'like' or 'share' information from this Website through social media sites, we strongly recommend you review the privacy policy of those sites. If you have an account with a social media site, that site may link your visits to this Website with Personal Information.

## **10. MARKETING COMMUNICATIONS**

10.1 We may send you marketing communications, including direct marketing by telephone, email messaging, mobile messaging (SMS/MMS), mail or any other forms of contact you supply to us.

10.2 You may opt out of receiving marketing communications by notifying us using the details in the Contact section below, by clicking the unsubscribe link in our email messages, or as indicated in our mobile messages (SMS/MMS).

## **11. ACCESSING, CORRECTING AND UPDATING PERSONAL INFORMATION**

11.1 You can contact us to access, correct, or update Personal Information we hold about you.

11.2 If you request access to Personal Information, we will endeavour to make it available to you within 30 days, unless giving access is unlawful or we are subject to restrictions or we are required to process your request earlier under applicable laws.

11.3 It is important your Personal Information is accurate and current. Please keep us informed if your Personal Information changes. We will take reasonable steps to ensure Personal Information we collect, use, store and disclose is correct, current and complete.

11.4 If you request to correct or update Personal Information, we will correct, update, or, if we consider it more appropriate, note your request for amendment of Personal Information on your record.

11.5 You can access, correct or update Personal Information by using the details in the Contact section below.

11.6 To access, correct or update Personal Information you must verify your identity by providing your full name, address and contact details, together with 100 points of identification.

## **12. COMPLAINTS**

12.1 If you have a complaint about the way we handle your Personal Information, you can contact us using the details in the Contact section below.

12.2 We will consider your complaint and take all reasonable steps to remedy any issues. We will endeavour to respond to you within 30 days.

12.3 If you are not satisfied with the outcome of your complaint, you may seek a review by contacting the Office of the Australian Information Commissioner here.

## **13. CONTACT**

13.1 If you have any questions about this Privacy Policy or the way in which we handle Personal Information, or you would like to access, correct or update your Personal Information, or if you have a complaint, please contact us in writing on the details below, marked attention Privacy Officer:

Email: [julia.r@keepingclients.com.au](mailto:julia.r@keepingclients.com.au)  
Mail: 73B Raymond Road, Springwood NSW 2777

## **14. UPDATES TO THIS PRIVACY POLICY**

14.1 This Privacy Policy was last updated on 11 February 2020.

14.2 This Privacy Policy replaces any other Privacy Policy published by us to date.

14.3 We reserve the right to alter, amend, modify or otherwise update this Privacy Policy in our sole and absolute discretion, from time to time, without notice to you.

14.4 Updates will be effective immediately upon publication on this Website. You should check this page from time to time to make sure you are aware of any updates.

14.5 By continuing to use this Website after publication of any updates, you acknowledge and agree that you have read, understood and accept to be bound by this Privacy Policy as altered, amended, modified or otherwise updated.