



Coffey International Limited Privacy Policy

July 2014

Privacy Policy

1. Introduction

Coffey International Limited and its related bodies corporate (**we, our, us**) recognise your rights under the Privacy Act 1988 (Cth) (**Act**) and we comply with all of the Act's requirements in respect of the collection, management and disclosure of your personal information. This document is our Privacy Policy and it tells you how we collect and manage your personal information.

2. What is personal information?

The term "personal information" has the meaning given to it in the Act. In general terms, it is the information that can be used to personally identify you. This may include your name, address, telephone number, email address and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

3. This Privacy Policy does not apply to employee records

This Privacy Policy does not apply to "employee records" which are defined in the Act as records of personal information relating to the employment of an employee.

4. What personal information do we collect and hold?

We will only collect personal information which is relevant for the purpose for which it is sought and will not intrude to an unreasonable extent upon your personal affairs.

We may collect the following types of personal information:

- name;
- mailing or street address;
- email address;
- telephone number;
- facsimile number;
- age or birth date;
- profession, occupation or job title;
- details of the products or services you have purchased from us or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries;
- any additional information relating to you that you provide to us directly through our website or indirectly through use of our websites or online presence, through our representatives or otherwise; and
- information you provide to us through customer surveys or visits by our representatives from time to time.

5. How do we collect personal information?

We collect personal information directly from you, except where you have consented to us collecting the personal information from a third party or the law permits us to do so or if it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect it in ways including:

- through your access and use of our website or internal IT systems;
- during conversations between you and our representatives;
- when you complete an application or purchase order or enter into a contract for services with us; or
- orally, in writing, by telephone, by e-mail and through other methods of communication.

We may also collect personal information from third parties including third party companies such as credit reporting agencies, law enforcement agencies and other government entities.

We are reliant on you to ensure that the personal information you supply to us is true and accurate to the best of your knowledge.

6. Use of cookies

In some cases we may also collect your personal information through the use of cookies. When you access our website, we may send a "cookie" (which is a small summary file containing a unique ID number) to your computer. This enables us to recognise your computer and greet you each time you visit our website without bothering you with a request to register. It also enables us to keep track of products or services you view so that, if you consent, we can send you news about those products or services. We also use cookies to measure traffic patterns, to determine which areas of our website have been visited and to measure transaction patterns in the aggregate. We use this to research our users' habits so that we can improve our online products and services. Our cookies do not collect personal information. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.

We may log IP addresses (that is, the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track users movements and gather broad demographic information.

7. What happens if you do not provide us with your personal information?

If you decide not to provide us with your personal information as described above, some or all of the following may happen:

- we may be unable to provide you with the products and services you may wish to purchase or with information about products and services specific to your interests; or
- we may be unable to tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful.

8. For what purpose do we collect, hold, use and disclose your personal information?

We collect personal information about you so that we can perform our business activities and functions and to provide the best possible quality of service.

The purposes for which we may collect personal information include, but are not limited to:

- providing products and services to you and to send communications requested by you;
- canvassing suitability for potential job vacancies;
- answering enquiries and providing information or advice about existing and new products or services;
- assessing the performance of the website and to improve the operation of the website;
- conducting business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- the administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes;
- updating our records and to keep your contact details up to date;
- processing and responding to any complaint made by you; and
- complying with any law or in co-operation with any governmental authority or agency of any country.

We will not share, sell, rent or disclose your personal information other than as described in this Privacy Policy.

9. Disclosure of personal information

We may disclose your personal information to:

- our employees, contractors or service providers for the purposes of operation of our website or our business, fulfilling requests by you, and to otherwise provide products and services to you including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors and professional advisors such as accountants, solicitors, business advisors and consultants;
- suppliers and other third parties with whom we have commercial relationships, for business, marketing and related purposes; and
- any organisation for any authorised purpose with your consent.

10. Direct marketing materials

We may send you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the *Spam Act 2003* (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical do to so. In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list. We do not provide your personal information to other organisations for the purposes of direct marketing.

11. Storage and security of personal information

Personal information is stored in written or electronic form on our servers and computers and in various physical locations.

We will take reasonable steps to protect your personal information from misuse and loss, and unauthorised access, modification and disclosure, and any other interference.

Personal information is destroyed, de-identified or archived when no longer required.

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

12. Access to and correction of your personal information

You may request access to any personal information we hold about you at any time by contacting us (see details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We will not charge for making the request and not charge for making any corrections to your personal information.

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. Our contact details are set out below. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment then we will add a note to the personal information stating that you disagree with it.

13. Disclosure of personal information outside Australia

We may disclose personal information to our related bodies corporate and third party suppliers and service providers located overseas for some of the purposes listed above.

We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

We may disclose your personal information to entities outside of Australia, including but not limited to the following:

- our related bodies corporate, located in New Zealand, Papua New Guinea, United States of America, Canada, Brazil, Philippines, Vietnam, United Arab Emirates, United Kingdom, Kenya, Ghana and South Africa; and
- our data hosting and other IT service providers, located in the Philippines.

14. Complaints about breach of privacy

If you believe that your privacy has been breached, please contact our Privacy Officer using the contact information below and provide details of the incident so that we can investigate it.

We will attempt to confirm as appropriate with you your understanding of the conduct relevant to the complaint and what you expect as an outcome. We will inform you whether we will conduct an investigation, the name, title, and contact details of the investigating officer and the estimated completion date for the investigation process.

After we have completed our enquiries, we will contact you, usually in writing, to advise the outcome and invite a response to our conclusions about the complaint. If we receive a response from you, we will assess it and advise if we have changed our view. If you are unsatisfied with the outcome, we will advise you about further options including, if appropriate, review by the Privacy Commissioner within the Office of the Australian Information Commissioner.

15. Contacting us

You are entitled to request access to all personal information you have given us. You may make any changes you deem appropriate, including the removal of personal information that you do not want us to retain.

If you have any questions on the protection of the information that you have given to us or would like further information on our Privacy policy, please contact our Privacy Officer at:

Privacy Officer
Coffey International Limited
Address: Level 19, Tower B, Citadel Towers 799 Pacific Highway, Chatswood NSW 2067
Tel: (02) 9406 1000
Email: privacy@coffey.com

16. Changes to Policy

We may review this policy and make changes from time to time. Any updated versions of this Privacy Policy will be posted on our website. It is your responsibility to check our website for any updated policy.

Appendix

Document control information

Document status

The current status of this document is shown below.

Title	Privacy Policy (Australia)
Version	3.0
Effective date	11 July 2014
Publisher	Legal
Content Owner	Legal Counsel
Authorised by	Finance Director

Document history

The history of changes made to this document is shown below.

Version	Date published	Author	Description / Changes
1.0	5 March 2014	Legal	1st version of Coffey Privacy Policy (Australia)
2.0	7 July 2014	Legal	Remove “Australia” from title
3.0	11 July 2014	Legal	Amend clause 15