



# Privacy Policy

## In this document:

- WA South West Leaders will be referred to as 'we' or 'us' or 'our'.
- Personal information means information or an opinion about you where it is possible to ascertain your identity from that information or opinion.

Leaders has the right to conduct The Program and has appointed Phaistos Pty Ltd ACN 624 425 092 to assist in the delivery of The Program.

## Our Privacy Commitment

Australian law protects the privacy of your personal information. This policy document outlines how we collect, maintain, use and disclose personal information about you. It also sets out our policies for the management of personal information.

We will manage your personal information in accordance with the law and the Australian Privacy Principles (subject to any other over-riding provisions of law) and as specified in this document. Our Privacy Policy may change from time to time without notice.

*This Privacy Policy is to be read subject to any over-riding provisions of law or contract.*

## Where we collect the information from

In most instances personal information about you will be collected directly from you in either an application form or documents completed by you, correspondence from you to us, during an interview or from telephone or email contact.

Personal information about you may also be collected from one of our websites, such as IP address and pages viewed whilst using the website. Further information will only be collected if you voluntarily provide us with your details (e.g. if you email your contact details to us or complete an online nomination or contact form).

Our contact details are:

49 Broadway Street, Woolloongabba, Qld, 4102, Australia

Phone: (07) 3392 1661

info@intlleaders.com.au

We may also obtain personal and other information from some third parties such as accountants and other organisations who have referred you to us. In this instance, your details will be utilised only for the purpose of which they were referred.

When we obtain personal and other information from third parties to whom we have been referred by you, we will assume and you will ensure that you have made that third party aware of your referral and the purposes involved in the collection, use and disclosure of the relevant personal or other information.

Information may include, but not limited to:

- Your name, address, contact details and date of birth;
- Your email address;
- Details of your annual revenue, expenditure and employment;
- Details of your assets and liabilities;
- Details of any securities or investments you hold;
- Details of your associated bank accounts.

We will assume you consent to the collection of your personal information in the manner specified in this Privacy Policy until you advise us otherwise.

## Access to Information

You are entitled to at any time to request access to personal information held by us about you and to ask us to correct this information where you believe (and in some circumstances prove) it is incorrect or out of date.

To do this please contact us in writing using the contact details above and you will be advised of our procedures for accessing and correcting personal information.

We will not charge you for lodging a request to access your personal information but may charge you for our reasonable costs of making the personal information available to you. In limited circumstances access may be denied where required or permitted by law. If we decided not to provide you with access to your personal information, we will give you our reasons for our decision.

## Complaints

If you have a complaint about our treatment of your privacy, please contact our privacy officer in writing using the contact details above. Our privacy officer will investigate your complaint and endeavour to resolve any issue to your satisfaction.

## Use and disclosure of information

We will only use or disclose the personal information collected about you for the purposes for which it was collected (including one or more of those purposes specified in this Privacy Policy) or related purposes which you would reasonably expect us to use or disclose the personal information for, or where you have consented to us using or disclosing the personal information.

## We use your personal information for the following purposes:

- Enable us to assess any request from you for business services;
- Send information to you;
- Respond to any specific requests you may contact us about;
- Help us to conduct assessments on your behalf;
- Notify you of any services that may be of interest to you;
- Keep you informed on matters that may affect or be related to you;



# Privacy Policy Contd.

## **We use your personal information for the following purposes contd:**

- Update your personal files;
- Enable us to meet our obligations under certain laws;
- To assist in determining your objectives;
- To provide you with regular reviews and keep you informed;
- Any purpose for which the information is requested and any directly related purpose;
- Developing, improving and marketing our products and service.

## **Other information**

To improve your experience on our website, we may use 'cookies'. See below for more information on 'cookies'.

Our website may contain links to other websites. Please be aware that we are not responsible for the privacy practices of such other sites. When you visit a link from our website, we advise you to be aware and read their privacy policy.

The information we collect and share with third parties through cookies is aggregated and therefore anonymous (it does not include personal information which is likely to identify you). The information may be used when you visit our website and third-party websites.

While we recommend that users enable cookies on their browsers in order to enjoy all the features of our website, the decision remains in the hands of the individual. Most browsers allow you to control management of cookies, this will be different depending on each user's PC – refer to your browser help menu for further information.

## **Data**

Where we obtain any data as a result of your use of our websites or through any information which you may provide to us, you acknowledge that we will own the data and all rights which may subsist in relation thereto. Such data will generally be collected and maintained in an aggregated form, without any personal details which would otherwise identify you.

## **Disclosure or distribution to third parties**

We do not provide your personal information to others unless:

- you consent to disclosure or;
- for one of the other reasons identified above.

In the event that we allow personal information to be able to be accessed by third parties for organisational purposes such as computer hosting, we will ensure that they maintain your privacy and we may require those organisations to sign confidentiality agreements.

## **Information about third parties**

Where you have provided us with information about third parties, the same privacy considerations will apply to this information as to your own personal information. When we receive this information, we will assume that you are authorised to provide it to us. If requested, you must notify the person that you have provided their information to us.

## **Cookies**

You do not have to provide us with any personal information if you are a visitor to our website and you may choose to remain anonymous or to provide us with a pseudonym if you do not wish to reveal your identity. However, you should be aware that by remaining anonymous or in providing a pseudonym, you may not be able to access all of our website. We may also be unable to properly provide services and advice to you or the nature and extent of that advice may be limited. We may also be unable to properly respond to any request.

The use of our website may involve the use of cookies. Cookies are used by most major websites. A cookie is a small text or data file that a website transfers to your hard drive to allow the website to track the pages that you have visited or remember your preferences. A cookie only contains information you supply, and it cannot access information from your system. We will use this information for the purposes of optimising the effectiveness of our web services. We use cookies to monitor the traffic to the various pages on our website so that we can improve its relevance to visitors and clients. Most of this information is aggregated and used for statistical purposes. It will generally contain non-personally identifiable information such as your internet provider, date and time, search phrases, or referring websites.

Most browsers are set up to accept cookies. However, if you do not wish to receive any cookies, you may be able to change the settings of your browser to give you greater control over this. You may refuse the use of cookies by selecting the appropriate settings on your browser. However, that may also result in you not being able to use the full functionality of the website.

We also collect some information about your use of our website. Much of this information will not be personal as it will not reveal your identity.

You may choose to provide us with personal information in some circumstances when you access our website, including where you wish to request products or services, ask us to respond to queries or correspondence, or apply for work. If you provide us with someone else's personal information, you should only do so if you have their authority or consent. You should also take reasonable steps to inform them of the matters set out in this privacy policy.

## **Disclosing your Personal Information**

We may disclose your personal information to the following organisations for the purposes specified:

- To related companies of ours for the purpose of marketing new opportunities to you;
- To potential investors in private & public equity markets;
- To our bank;
- To outsourcing organisations contracted by us to provide administrative functions on our behalf, for example, IT contractors providing maintenance of our data systems.

In addition, we may disclose personal information it holds about you in the following circumstances:

- You consent to the disclosure;
- If the disclosure is required by law.



# Privacy Policy Contd.

From the information we obtain from you we use some of it to keep you informed of other products, services or opportunities that may be of interest to you or help you achieve your commercial objectives. Please contact us in writing using the contact detail above if you do not want your personal information to be used for these purposes. We will not disclose information about you to third parties for direct marketing purposes.

## **Email address**

Unless otherwise specified in this Privacy Policy, if you provide us with your email address during a visit to one of our web sites it will only be used for the purpose for which you provided it to us. It will not be added to a mailing list unless the mailing list is related to the purpose for which you provided your email address to us. We may use your email address, for example, to provide you with information about a particular service or product or to respond to a message you have sent us.

## **Consequence of not providing personal information**

You may choose not to give us your personal information. Depending on the type of product or service you request the consequence set out below may apply if you do not give some or all of your personal information to us:

- We will not be able to provide you with information about or access to its services or products

## **Security and Retention Policies**

We are committed to ensuring the security of personal information that we hold about you. We require all staff to keep personal information confidential. We take all reasonable steps to protect the physical security of information and to prevent unauthorised access such as restricted access to records, passwords and firewalls.

We strive to ensure the security, integrity and privacy of personal information submitted to our website. Unfortunately, no data transmission over the internet can be guaranteed to be totally secure and you acknowledge and accept this risk when accessing and using our website.

We will endeavour to take reasonable commercial steps to protect personal information you provide us, whether kept in electronic form or hard copy, including in relation to your use of the website and ensure its security on our systems.

Our employees and any third parties who provide services are obliged to respect the confidentiality of any personal information held by us. However, we will not be held responsible for any loss or damage which is directly or indirectly caused by unauthorised access to your personal information.

Our web servers store the IP address of users that access and use our website. We use IP addresses to assist the diagnosis of problems or support issues with our website and to analyse the usage and traffic of the website. This information is gathered in an aggregated and de-identified format which cannot be attributed to an individual user.

Personal information we no longer require may also be destroyed. An exception to this may be where the records are required to be retained by law.

We use international electronic hosting ('cloud') services for some of our data storage. Any details you provide to us may be stored or forwarded, either wholly or in part, with these service providers.

## **Updating our Privacy Policy**

We may amend this Privacy Policy without notice at any time and from time to time. If we do so, we may post the amended Privacy Policy on our website so that you can be aware of how we manage your personal information.