

GATTORNA ALIGNMENT – PRIVACY POLICY

Welcome to our website! Your privacy is important to us. Our aim is to be transparent about what types of personal information we collect, what we do with it, and where we store it. If you have any concerns about how we handle your personal information, please reach out to us at the details below.

This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or otherwise collected by us, offline or online, including through our website (**Site**). In this Privacy Policy **we, us** or **our** means Gattorna Ellis Advisory, trading as Gattorna Alignment ABN 94 622 302 916.

Personal information

In providing our Site and services to you, the types of personal information we may collect about you include:

- your name;
- your contact details, including your employer, job title, email address, mobile number, and landline number;
- your credit card or payment details;
- your preferences and/or opinions;
- information you provide to us through customer surveys;
- your sensitive information as set out below;
- details of products and services we have provided to you and/or that you have enquired about, and our response to you;
- your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour;
- information about your access and use of our Site, including through the use of Internet cookies, your communications with our Site, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider;
- additional personal information that you provide to us, directly or indirectly, through your use of our Site, associated applications and/or accounts from which you permit us to collect information; and
- any other personal information requested by us and/or provided by you or a third party.

When providing services to our clients, we may also receive the following information about you:

- your contact details, including your employer, job title, email address, mobile number, and landline number;
- your customer and supplier contact lists; and
- data containing details of your transactions with suppliers or customers.

We may collect these types of personal information directly from you or from third parties.

Collection and use of personal information

There are a number of different reasons why we may collect, hold, use and disclose personal information, including:

- to provide our services to you or your employer;
- to provide our services to our clients, including to conduct interviews and surveys with you;
- to process and analyse the personal information and data we collect in surveys and interviews, and to present this in a synthesised format to our clients;
- to enable you to access and use our Site and associated applications;
- to contact and communicate with you, including via email and SMS;
- for internal record keeping, administrative purposes, invoicing and billing purposes;
- for analytics, market research and business development, including to operate and improve our Site and associated applications;
- for advertising and marketing, including to send you promotional information about our products and services and information about third parties that we consider may be of interest to you;
- to comply with our legal obligations and resolve any disputes that we may have; and
- to consider your employment application.

Disclosure of personal information to third parties

Sometimes we need to provide personal information to third parties, and we only provide this information to those parties where required to carry out our business activities, including the provision of our Site and services. We may disclose personal information to:

- third party service providers for the purpose of enabling them to assist us in providing our services to you, including (without limitation) market research companies, survey companies, IT service providers, data storage, web-hosting and server providers, debt collectors, maintenance or problem-solving providers, advertising providers, professional advisors and payment systems operators;
- our employees, contractors and/or related entities;
- our existing or potential agents or business partners;
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;
- credit reporting agencies, courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- courts, tribunals, regulatory authorities and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;

- third parties, including agents or sub-contractors, who assist us in providing information, products, services or direct marketing to you. This may include parties located, or that store data, outside of Australia; and
- third parties to collect and process data, such as Google Analytics.

By providing us with personal information, you acknowledge that some third parties may not be regulated by the Privacy Act and the Australian Privacy Principles in the Privacy Act and if any third party engages in any act or practice that contravenes the Australian Privacy Principles, it would not be accountable under the Privacy Act and you will not be able to seek redress under the Privacy Act.

How we treat personal information that is also sensitive information

Sensitive information is a sub-set of personal information that is given a higher level of protection under the Australian Privacy Principles. **Sensitive information** means information relating to your racial or ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation or practices, criminal records, health information or biometric information.

We will not collect sensitive information about you without first obtaining your consent.

The types of sensitive information we may collect about you include:

- dietary information; and
- disability information including your accessibility requirements.

Provided you consent to us collecting sensitive information about you, your sensitive information may only be used and disclosed for purposes relating to the primary purpose for which the sensitive information was collected, including:

- for planning catering at our events;
- for assessing the suitability of venues for you; and
- providing services for a purpose that is directly related to the primary purpose for which the sensitive information was collected.

Sensitive information may also be used or disclosed if required or authorised by law.

Your rights and controlling your personal information

Choice and consent: Please read this Privacy Policy carefully. You do not have to provide personal information to us, however, if you do not, it may affect your use of this Site or the products and/or services offered on or through it. If you are providing personal information to us, please note we will only collect, hold, use and disclose your personal information in accordance with this Privacy Policy.

Information from third parties: If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

Anonymity: Where practicable we will give you the option of not identifying yourself or using a pseudonym in your dealings with us.

Restrict: If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by contacting us using the details below.

Access: You may request details of the personal information that we hold about you. An administrative fee may be payable for the provision of such information.

Correction: If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to correct any information found to be inaccurate, incomplete, misleading or out of date.

Complaints: If you wish to make a complaint about how we have handled your personal information, please contact us using the details below and provide us with full details of the complaint. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your complaint.

Unsubscribe: To unsubscribe from our e-mail database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

Storage and security

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

We cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that the personal information we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

Cookies and web beacons

We may use cookies on our Site from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do allow third parties, such as Google and Facebook, to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. If and when you choose to provide our Site with personal information, this information may be linked to the data stored in the cookie.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

We may use web beacons on our Site from time to time. Web beacons (also known as Clear GIFs) are small pieces of code placed on a web page to monitor the visitor's behaviour and collect data about the visitor's viewing of a web page. For example, web beacons can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page.

We may use Google Analytics to collect and process data. To find out how Google uses data when you use third party websites or applications, please see www.google.com/policies/privacy/partners/ or any other URL Google may use from time to time.

Links to other websites

Our Site may contain links to other websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

Amendments

We may, at any time and at our discretion, vary this Privacy Policy by publishing the amended Privacy Policy on our Site. We recommend you check our Site regularly to ensure you are aware of our current Privacy Policy.

For any questions or notices, please contact our Privacy Officer (Deborah Ellis) at:

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Email contact via: jacqui@gattornaalignment.com **Last update:** 5 September 2019

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