



Privacy Policy

ACOR Consultants

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Introduction

From time to time the ACOR Group of Companies ("ACOR") is required to collect, hold, use and/or disclose personal information relating to individuals (including, but not limited to, its customers, contractors, suppliers and employees) in the performance of its business activities.

This document sets out ACOR's policy in relation to the management of personal information and compliance with the Australian Privacy Principles ("APPs") in accordance with the Privacy Act 1988 (Cth) ("the Act").

What is personal information?

Under the Act, personal information means information, or an opinion, about an identified individual (or an individual who is reasonably identifiable) which may or may not be true, recorded in a material form or otherwise

Employee records

This Policy does not apply to the management of personal information that is an employee record. Refer Employee Records Privacy Policy.



Obligations of Management and Employee

In order to operate its business activities and functions, it is reasonably necessary for ACOR to collect personal information.

The types of personal information that ACOR collects about individuals depends on the person's relationship with ACOR. For example:



Customer

if you are a customer of ACOR, ACOR may collect and hold information including your name, address, email address, contact telephone number, industry affiliations, financial status, and payment details.



Supplier (including contractors and subcontractors)

if you are a supplier of ACOR, ACOR may collect and hold information including your name, address, email address, contact telephone number, business records, age and gender, billing information, information about goods and services you supply, licensing, industry associations and professional affiliations.

For management of information about an employee, candidate for employment or a nominated referee, refer ACOR Employee Records Privacy Policy.

ACOR will only collect certain sensitive information (as defined by the Act) where you consent to the collection of the information and the information is reasonably necessary for one or more of ACOR's functions or activities. Sensitive information includes, but is not limited to, information or an opinion about membership of professional or trade association, membership of a trade union, political opinions and membership of political associations, religious beliefs or affiliations, criminal record, or health information



How ACOR collects and holds personal information

ACOR is committed to ensuring that it manages personal information in an open and transparent way and will collect personal information only by lawful and fair means. ACOR will collect personal information directly from you if it is reasonable or practicable to do so.

ACOR may collect personal information in a number of ways, including without limitation:

- through application forms;
- by email or other written communications;
- over a telephone call
- in person;
- through commercial transactions and procurement of services;
- through our website;
- through surveillance cameras;
- by technology that is used to support communications between us;
 - through publicly available information sources (which may include telephone directories, the internet and social media applications);
 - direct marketing database providers.

When ACOR collects personal information it will manage the information in accordance with the APPs.

How ACOR collects and holds personal information

At or before the time ACOR collects personal information, or, if it is not reasonably practicable, as soon as practicable after collection, ACOR will take reasonable steps to either notify you or otherwise ensure that you are made aware of the following:

- the identity and contact details of ACOR;
- that ACOR has collected personal information from someone other than you or if you are unaware that such information has been collected;
- that collection of personal information is required by Australian law, if it is;
- the purpose for which ACOR collects the personal information;
- the consequences if ACOR does not collect some or all of the personal information;
- any other third party to which ACOR may disclose the personal information;
- that ACOR's privacy policy contains information about how you may access and seek correction of personal information held by ACOR and how you may complain about a breach of the APPs; and
- whether ACOR is likely to disclose personal information to overseas recipients, and the countries in which those recipients are likely to be located.

Unsolicited personal information is personal information that ACOR receives which it did not solicit. Unless ACOR determines that it could have collected the personal information in accordance with APPs, it will destroy the information or ensure it is de-identified.

ACOR will store all solicited and unsolicited personal information within secure electronic and paper storage systems (including any type of data base or document filing system). It will limit access to the personal information to only those representatives of ACOR who need to access the personal information. It will take all reasonable steps to protect the personal information from unauthorised or unlawful disclosure.

Purposes for which ACOR collects, holds, uses and/or discloses personal information

The purposes for which ACOR may collect, hold, use and/or disclose personal information may include:

- recruitment functions;
- marketing and business development;
- customer service management;
- commercial administration of its business (including receipt and making of payments);
- training and events;
- surveys and general research;
- business relationship management.

ACOR may collect and use personal information for any of the above related purposes. Personal information collected for a particular purpose may reasonably be used in relation to another related purpose.

ACOR may also collect, hold, use and/or disclose personal information if you consent or if required or authorised under law.

Direct marketing:

- ACOR may use or disclose personal information (other than sensitive information) about you for the purpose of direct marketing (for example, advising you of new goods and/or services being offered by ACOR).
- ACOR may use or disclose sensitive information about you for the purpose of direct marketing if you have consented to the use or disclosure of the information for that purpose.
- You can opt out of receiving direct marketing communications from ACOR by contacting the Privacy Officer in writing or, if preferable, accessing ACOR's website and unsubscribing appropriately.

Disclosure of personal information

ACOR may disclose your personal information for any of the purposes for which it was collected, as indicated on page 7 of this policy, or where it is under a legal duty to do so.

Disclosure will usually be done internally and to related entities or to third parties such as contracted service suppliers. It is unlikely that ACOR will disclose personal information to overseas recipients. In the event a disclosure to an overseas recipient is proposed, you will be notified of the intended disclosure and the purpose.

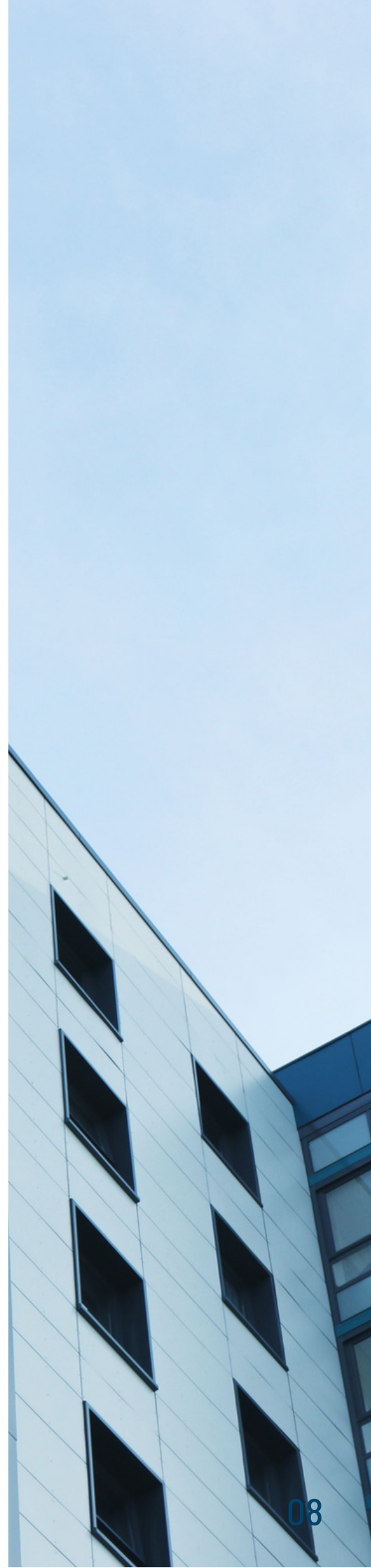
Before ACOR discloses personal information about you to a third party, ACOR will take steps as are reasonable in the circumstances to ensure that the third party does not breach the APPs in relation to the information.

Access to personal information

If ACOR holds personal information about you, you may request access to that information by putting the request in writing and sending it to the Privacy Officer. ACOR will respond to any request within a reasonable period, and a charge may apply for giving access to the personal information.

There are certain circumstances in which ACOR may refuse to grant you access to the personal information in accordance with the APPs. In such situations ACOR will give you written notice that sets out:

- the reasons for the refusal; and
- the mechanisms available to you to make a complaint.





Correction of personal information

If ACOR holds personal information that is inaccurate, out-of-date, incomplete, irrelevant or misleading, it must take steps as are reasonable to correct the information.

If ACOR holds personal information and you make a request in writing addressed to the Privacy Officer to correct the information, ACOR must take steps as are reasonable to correct the information and ACOR will respond to any request within a reasonable period.

There are certain circumstances in which ACOR may refuse to correct the personal information. In such situations ACOR will give you written notice that sets out:

- the reasons for the refusal; and
- the mechanisms available to you to make a complaint

If ACOR corrects personal information that it has previously supplied to a third party and you request us to notify the third party of the correction, ACOR will take such steps as are reasonable to give that notification unless impracticable or unlawful to do so.

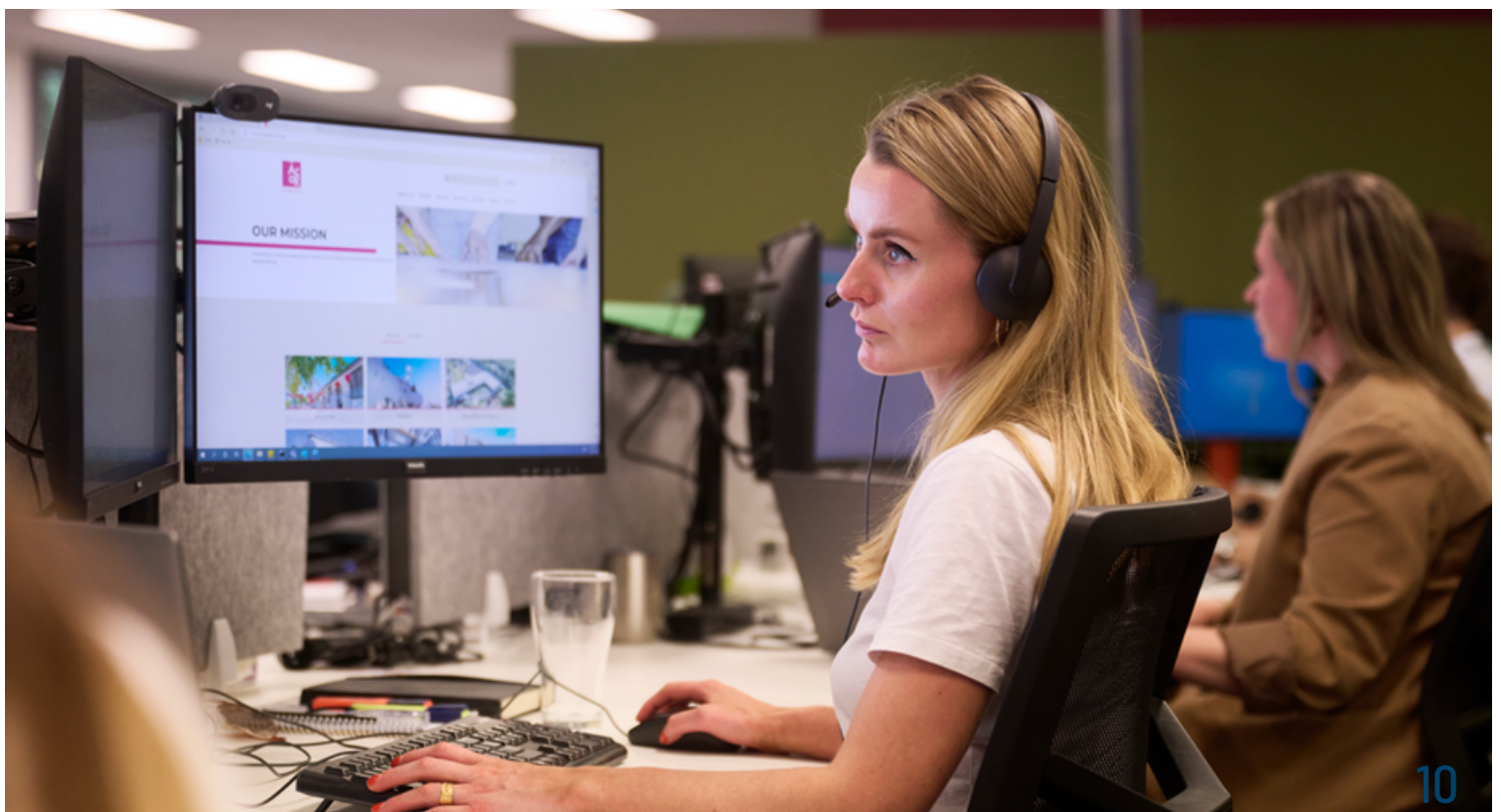
Integrity and security of personal information

ACOR will take such steps (if any) as are reasonable in the circumstances to ensure that the personal information that it:

- collects is accurate, up-to-date and complete; and
- uses or discloses is, having regard to the purpose of the use or disclose, accurate, up-to-date and complete

ACOR will take steps as are reasonable in the circumstances to protect the personal information from misuse, interference, loss and from unauthorised access, modification or disclosure.

We follow the client's processes and directions as to how our proposals are submitted. We never seek to gain advantage or information through any means other than the manner in which the client intends or how our peers, with whom we compete, would expect.



Anonymity and pseudonymity

All individuals have the option of not identifying them self, or using a pseudonym, when dealing with ACOR in relation to a particular matter. This does not apply:

- where ACOR is required or authorised by or under an Australian law, or a court/tribunal order, to deal with individuals who have identified themselves; or
- where it is impracticable for ACOR to deal with individuals who have not identified themselves or who have used a pseudonym.

Complaints

Individuals have a right to complain about ACOR's handling of personal information if it is alleged that ACOR has breached an APP. All complaints must be made to ACOR's Privacy Officer. The complaint will be reviewed by the Privacy Officer and notice of the Privacy Officer's determination will be provided to the complainant and ACOR's Board of Directors.

Breach of this policy

Any representative of ACOR who is found to have breached this policy may be subject to disciplinary action, including termination of employment or referred to law enforcement in the event of a breach of the Act.

ACOR's Privacy Officer can be contacted via the details below

Nicole Brewer

NBrewer@acor.com.au

PO Box 292 St. Leonards NSW 1590

Tel (+61) 2 9438 5098