

PRIVACY POLICY

This Privacy Policy details how we protect your privacy and how we comply with the requirements of the Privacy Act and the Australian Privacy Principles. This policy also describes:

- Who we collect information from;
- The types of personal information collected and held by us;
- How this information is collected and held;
- The purposes for which your personal information is collected, held, used and disclosed;
- How you can gain access to your personal information and seek its correction;
- How you may complain or inquire about our collection, handling, use or disclosure of your personal information and how that complaint or inquiry will be handled; and
- Whether we are likely to disclose your personal information to any overseas recipients.

ONLINE CREDIT CARD PAYMENTS

When you purchase a subscription or package online a secure server is used. Secure Server Layer (SSL) encrypts the information you send through this web site. First Direct Resolutions Pty Ltd (abn 87 630 509 821) makes no warranty in respect of the strength or effectiveness of that encryption and First Direct Resolutions Pty Ltd is not responsible for events arising from unauthorised access of the information you provide.

WHO DO WE COLLECT PERSONAL INFORMATION FROM?

At First Direct Resolutions we collect personal information from clients, occupiers, job applicants, staff, contractors, visitors and others that come into contact with the business.

WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT?

The kinds of personal information we collect is largely dependent upon whose information we are collecting and why we are collecting it, however in general terms, the business may collect:

- Personal Information including names, addresses and other contact details, dates of birth, next of kin details, financial information and photographic images.

HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

How we collect personal information will largely be dependent upon whose information we are collecting. If it is reasonable and practical to do so, we collect personal information directly from you.

Where possible the Business has attempted to standardise the collection of personal information by using specifically designed forms and systems. However, given the nature of our operations, we often also receive personal information by email, letters, notes, over the telephone, in face to face meetings, through surveillance activities such as the use of cameras for recordings and video/

We may also collect personal information from other people (eg. personal reference) or independent sources (eg. a telephone directory), however we will only do so where it is not reasonable and practical to collect the information from you directly.

Sometimes we may be provided with your personal information without having sought it through our normal means of collection. We refer to this as "unsolicited information". Where we collect unsolicited information we will only hold, use and/or disclose that information if we could otherwise do so had we collected it by normal means. If that unsolicited information could not have been collected by normal means then we will destroy, permanently delete or de-identify the information as appropriate.

HOW DO WE USE PERSONAL INFORMATION?

We only use personal information that is reasonable and necessary for one or more of our functions or activities (the primary purpose) or for a related secondary purpose that would be reasonably expected by you, or to which you have consented.

Our primary uses of personal information include but are not limited to:

- Providing agent services
- Satisfying our legal obligations
- Keeping clients informed as to Business matters through correspondence, newsletters and magazines
- Marketing and promotional activities
- Supporting the community-based causes and activities, charities and other causes in connection with the Business's functions or activities
- Helping us to improve our day to day operations including training our staff; developing our systems; developing new programs and services; undertaking planning, research and statistical analysis
- Undertaking Business administration requirements including for insurance purposes
- Employing staff
- We only collect sensitive information when it is reasonable and necessary for one or more of these functions or activities, if we have the consent of the individuals to whom the sensitive information relates.
- We will only use or disclose sensitive information for a secondary purpose if you would reasonably expect us to use or disclose the information and the secondary purpose is directly related to the primary purpose.

HOW IS PERSONAL INFORMATION STORED AND KEPT SECURE?

We store personal information in a variety of formats, including on databases, in hard copy files and on personal devices including laptop computers, mobile phones, cameras and other recording devices.

The security of your personal information is of importance to us and we take all reasonable steps to protect the personal information we hold about you from misuse, loss, unauthorised access, modification or disclosure.

These steps include:

- Restricting access to information on the Business database on a need-to-know basis with different levels of security being allocated to staff based on their roles and responsibilities and security profile;
- Ensuring all staff are aware that they are not to reveal or share personal passwords;
- Implementing ICT security systems, policies and procedures, designed to protect personal information storage on our computer networks;
- Implementing human resources policies and procedures, such as email and internet usage, confidentiality and document security policies, designed to ensure that staff follow correct protocols when handling personal information;
- Undertaking due diligence with respect to third party service providers who may have access to personal information, including cloud service providers, to ensure as far as practicable that they are compliant with the Australian Privacy Principles or a similar privacy regime.

Personal information we hold that is no longer needed is destroyed in a secure manner, deleted or de-identified as appropriate.

Our website may contain links to other websites. We do not share your personal information with those websites and we are not responsible for their privacy practices. Please check their privacy policies.

RESPONDING TO DATA BREACHES

First Direct Resolutions Pty Ltd will take appropriate, prompt action if we have reasonable grounds to believe that a data breach may have or is suspected to have occurred. Depending on the type of data breach, this may include a review of our internal security procedures, taking remedial internal action, notifying affected individuals and the Office of the Australian Information Commissioner (OAIC).

If we are unable to notify individuals, we will publish a statement on our website and take reasonable steps to publicise the contents of this statement.

WHEN DO WE DISCLOSE PERSONAL INFORMATION?

We only use personal information for the purposes for which it was given to us or for purposes which are related (or directly related in the case of sensitive information) to one or more of our functions or activities. We may disclose your personal information to government agencies, other businesses, recipients of business publications, our service providers, agents, contractors, business partners and other recipients from time to time, only if one or more of the following applies: You have consented;

- You would reasonably expect us to use or disclose your personal information in this way;
- We are authorised or required to do so by law;
- Disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety;
- Where another permitted general situation or permitted exception applies;
- Disclosure is reasonably necessary for a law enforcement related activity.

HOW DO WE ENSURE THE QUALITY OF YOUR PERSONAL INFORMATION?

We take all reasonable steps to ensure the personal information we hold, use and disclose is accurate, complete and up to date. These steps include ensuring that the personal information is accurate, complete and up to date at the time of collection and when using or disclosing the personal information. On an ongoing basis we maintain and update personal information when we are advised by individuals or when we become aware through other means that their personal information had changed.

Please contact us if any of the details you have provided change. You should also contact us if you believe that the information we have about you is not accurate, complete or up to date.

HOW DO YOU GAIN ACCESS TO YOUR PERSONAL INFORMATION WE HOLD?

You may request access to the personal information we hold about you, or request that we change the personal information, by contacting us.

If we do not agree to provide you with access, or to amend your personal information as requested, you will be notified accordingly.

Where appropriate we will provide you with the reason/s for our decision. If the rejection relates to a request to change your personal information you may make a statement about the requested change and we will attach this to your record.

HOW DO YOU MAKE A PRIVACY COMPLAINT?

If you wish to make a complaint about a breach of the Australian Privacy Principles or the Health Privacy Principles you may do so by providing your written complaint by email, letter or by personal delivery to our contact details as noted below. You may also make a complaint verbally.

We will respond to your complaint within a reasonable time (usually no longer than 30 days) and we may seek further information from you in order to provide a full and complete response.

Your complaint may also be taken to the Office of the Australian Information Commissioner.

HOW DO YOU CONTACT US?

You can contact us about this Policy or about your personal information by:

Emailing: admin@firstdirectresolutions.com.au

Calling: 1300 902 212

Writing to:

First Direct Resolutions Pty Ltd
PO Box 3052
Mornington Vic 3931

If practical, you can contact us anonymously (i.e. without identifying yourself) or by using a pseudonym. However, if you choose not to identify yourself, we may not be able to give you the information or provide the assistance you might otherwise receive if it is not practical to do so.

WHAT HAPPENS IF THERE ARE CHANGES TO OUR PRIVACY AND INFORMATION HANDLING PRACTICES?

The Privacy Policy is subject to change at any time. Please check our Privacy Policy on our website regularly for any changes at:

www.firstdirectresolutions.com.au

REVIEW OF POLICY

This policy is to be reviewed annually.

Last review December 2018.

Review is to be undertaken prior to December 2019.