

PRIVACY POLICY

Shakespeare Partners understands that you value your privacy and wish to have your personal information kept secure. For these reasons, Shakespeare Partners places a high priority on the security of information we hold. We have developed this policy to inform you of how we manage your personal information and maintain its integrity and security.

We are bound by the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Privacy Act) and comply with the Principles. You can find more information about the Privacy Act and the National Privacy Principles on the Federal Privacy Commissioner's website at www.privacy.gov.au.

While we believe in keeping your personal information highly secure, we also believe that you have the right to be informed about how we deal with that information so, if on reading this policy you are unclear on any of the matters or simply want more information, please contact us on the telephone number or addresses provided below.

Collecting Personal Information

We aim to collect personal information only if it is relevant and necessary to providing the service or product you have requested from Shakespeare Partners.

In general you can assume that we collect and hold the following information:

- Contact details
- Dates of Birth
- Employment records
- Financial records
- Complaint details

We may also collect sensitive and special categories of personal information. For example, where we are provided with such information directly by our clients to provide professional services, or where we collect information directly from individuals with their consent. This may include:

- Government identifiers such as drivers' licence, passport and Medicare numbers and visa/work permit status
- Tax file numbers
- Health records
- Information about racial or ethnic origins
- Information about criminal convictions
- Membership of a political association or membership of a trade union.

We also collect personal information (such as contact details and account details) from suppliers, contractors and third party service providers that we engage to help us operate our business.

The collection will be fair, lawful and not intrusive.

Naturally we collect and hold a broad range of personal information gathered during the course of providing our services. However as stated above, we strive to ensure that we collect and hold only that personal information which is relevant and necessary to your specific matters.

Purposes of Collection

We collect information primarily to assist us in providing our services to you.

We may also use the information:

- to send newsletters to you;
- to invite you to seminars or events hosted by Shakespeare Partners;
- to inform you of products that can be purchased from Shakespeare Partners;
- to inform you of developments at Shakespeare Partners and other services that we can provide;
- To comply with health services related provisions and individual or public health or safety use and disclosure.

Third Parties

The following third parties may have access to personal information:

- External service providers that we engage to assist us in providing professional services to our clients or in the operation of our business (i.e. our subcontractors, advisors and suppliers)
- IT technicians may have access when providing on-site support although it is our practice for them to work under supervision;
- File storage services.

We will not otherwise disclose information about you unless the disclosure:

- is required by law;
- is authorised by law; or
- you have consented to our disclosing the information about you.

Cross-border disclosure of personal information

We may transfer personal information to related bodies, corporate or external service providers in locations outside Australia, including, but not limited to, India, United States, China, Poland, Philippines, in the course of storing that information and when using or disclosing it for one of the purposes referred to above. When transferring personal information to foreign jurisdictions, we will ensure that we satisfy one of the requirements below:

- we will take reasonable steps to ensure the overseas recipient does not breach the APPs in relation to the information;
- we form a reasonable belief that the overseas recipient is subject to a law, or binding scheme, that has the effect of protecting the information in a way that, overall, is at least substantially similar to the way in which the APPs protect the information and there are mechanisms that the individual can access to take action to enforce that protection of the law or binding scheme; or
- we will seek your informed consent prior to disclosing your personal information overseas.

Personal Information Quality

We aim to ensure that your personal information is accurate, complete and up to date. To assist us in this, you need to provide true, accurate, current and complete information about yourself as requested and properly update the information to us to keep it true, accurate, current and complete.

If you believe that the information is inaccurate or incomplete, please contact us and we will use all reasonable effort to correct the information.

In the event that we do not believe the information to be incorrect, we will take reasonable steps to add a statement to the information claiming that you believe the information is not accurate, complete or up-to-date.

Securing Your Personal Information

We are committed to maintaining the security and confidentiality of the data you provide us and we will take all reasonable precautions to protect your personal information from unauthorised disclosure, use or alteration.

We have the following security measures in place to protect your information:

- Technological security measures, including fire walls, encryption and anti-virus software
- after hours access to the building is by mill key only and access is monitored by video equipment on the ground floor and in the car park;
- our offices are also securely locked after hours;
- all computers have password protection;
- all computers linked to our intranet are password protected and virus protected;
- our offices are monitored regularly by a security service;
- our website is protected by a firewall;
- our employees all sign confidentiality agreements as part of beginning employment at Shakespeare Partners; and
- Training is provided to staff in relation to the Privacy Act.

Notifiable data breaches

We are required to notify you and the Information Commissioner of an eligible data breach. An eligible data breach happens if:

- There is unauthorised access to, unauthorised disclosure of, or loss of personal information held by us; and
- The access, disclosure or loss is likely to result in serious harm to you.

If you receive a statement of an eligible data breach from us, you should read and implement the recommendations about the steps you should take in response to the eligible data breach.

Accessing Your Personal Information

You have a limited right to access all personal information that we hold about you. In limited circumstances, we may refuse your request to access, in which case, we will give you a reason for that refusal.

We are not required to provide access where:

- denying access is required or authorised by law; or
- providing access would be unlawful.

Changes to this Statement

This Privacy Policy is not a static document, we may make changes to this Privacy Policy from time to time for any reason. We will publish these changes on our website.

Contacting Us

If you would like further information regarding this Privacy Policy, if you have concerns about the information that we currently hold about you, or any aspect of this Privacy Policy, please contact the Privacy Officer at:

Telephone	08 9321 2111
Email	info@shakes.com.au
Post	Shakespeare Partners PO Box 1257 WEST PERTH WA 6872