

Rice Warner Privacy Policy

About This Policy

Rice Warner is bound by the Privacy Act and the Australian Privacy Principles (APPs) which regulate the collection, use and disclosure of personal information.

The APPs aim to ensure that organisations that hold personal information about people, handle that information responsibly.

We respect every individual's rights to privacy and we comply with the requirements of the Act in respect of the collection, management and disclosure of the personal information of our staff and the customer records of our clients. This policy is intended to provide an understanding of how we deal with the personal information we collect in order to offer our services and products.

In accordance with the Act, Rice Warner will only collect personal information that we require to offer and administer our products and services or to manage the employment of our staff and appointment of contractors.

What is Personal Information?

When used in this policy, the term *personal information* has the meaning given to it in the Act. In general terms, personal information is information or an opinion that can be used to reasonably identify you, whether the information or opinion is true or not.

The Purpose of Collecting Personal Information

We will only collect personal information where it is reasonably necessary. We collect information in order to provide the following services and products and to manage the employment and engagement of our staff and contractors and to give you information about these matters:

- To provide any consulting or other services for a client
- For handling a staff insurance claim, to manage and assess the claim, and manage subsequent correspondence in relation to the claim.
- For recruitment purposes, to manage employment applications and, if someone is successfully placed in a position at Rice Warner, their ongoing employment.

Collection of Personal Information from clients

Generally, we collect personal information directly from clients to undertake industry research and to provide professional services. The types of personal information we collect does not include identification fields such as name, address or membership number. Depending on the nature of our assignment, it could include dates of birth, gender, post code, account balances, insurance cover, and investment strategy.

We rely on clients to only provide us with information that they have handled in accordance with the Privacy Act, including obtaining any necessary consent for us to collect, use and disclose that information.

As a visitor to this website, you do not have to submit any personal information in order to use it. This website only collects personal information that is specifically and voluntarily provided by visitors. We do not usually seek sensitive information from visitors using this website. We will, where necessary, obtain your consent to collect and use such information to maintain our records and to maintain you on our mailing list to receive blogs and newsletters from Rice Warner. Such information may consist of, however is not limited to, your name, current job title, company address, email address and telephone numbers.

Anonymity

Rice Warner understands that anonymity is an important element of privacy and that an individual may wish to have the option of not identifying themselves, or of using a pseudonym when dealing with an organisation. Where it is possible, Rice Warner will allow an individual the opportunity to remain anonymous or to use a pseudonym when dealing with us unless we are required or authorised by or under an Australian law, court or tribunal order to require individuals to identify themselves or it is impracticable for us to deal with individuals who have not identified themselves or used a pseudonym.

Using and Disclosing Your Personal Information

Personal information may be used to:

- Assist you to subscribe to our services.
- Provide the services you require.
- Administer and manage those services, including charging, billing and collecting debts.
- Conduct appropriate identity checks for client services provided to you.
- Gain an understanding of your information and communication needs in order for us to provide you with a better service.
- Maintain and develop our business systems and infrastructure, including testing and upgrading of these systems.

In order to deliver the services you require, we may disclose your personal information to organisations outside Rice Warner. Your personal information is disclosed to these organisations only in relation to us providing our services to you.

The relevant organisations and people for disclosure purposes are as required or authorised by law and regulations, for example, to government or regulatory bodies for purposes related to public health or safety, the prevention or detection of unlawful activities or to protect public revenue.

Security

Rice Warner places a high priority on the security of personal information, and we are committed to protecting the personal information provided to us. We take reasonable steps to ensure that personal information is secure and we use and maintain appropriate safeguards to prevent misuse and loss and from unauthorised access, modification or disclosure. We implement administrative, physical and technical safeguards to protect the confidentiality and integrity of personal information and data that we use and hold.

Practical personal information is de-identified or destroyed when it is no longer required.

Privacy on the Internet

We take care to ensure that the information you give us via our website is protected. Rice Warner uses and maintains appropriate safeguards to prevent the unauthorised access to or use of your personal information and data. We implement administrative, physical and technical safeguards to protect the confidentiality and integrity of your personal information and data which may be transmitted via the internet.

We use 'cookies' to store information provided by your browser when you visit our websites. This includes the date and time of your visit.

We also use cookies to measure demographic usage patterns to determine which areas of our website have been visited and to improve our services.

Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

The security of information transmitted on the Internet will also require you to take specific measures to protect against unauthorised access or use. These include:

- Ensuring that you do not divulge your password to anyone.
- Ensuring that your logins and passwords are kept secure.
- Notifying us immediately if you believe that your logins or passwords have been compromised.

Access and Correction

Rice Warner aims to ensure that the personal information we hold about individuals is accurate, up-to-date and complete. We will take reasonable steps to ensure the quality of your personal information at two distinct points in the information handling process: collection and use or disclosure.

If you advise us that the information that we hold about you is not accurate, up-to-date or complete, we will take reasonable steps to correct your information. You may request access to your personal information by contacting Rice Warner (see 'Contacting Us' section below). Rice Warner will need to establish the identity of the individual requesting the information prior to providing it.

There are a number of situations where Rice Warner may deny an individual access to personal information. These can include circumstances where it would have an unreasonable impact on the privacy of other individuals, the information relates to existing or anticipated legal proceedings, we have reason to suspect that unlawful activity or misconduct of a serious nature is being or may be engaged in, or where the law requires or authorises such access to be denied. Rice Warner will advise you if any of these or other circumstances apply.

Direct Marketing

Rice Warner may send you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms including mail, fax and electronic media such as email and SMS and social media such as Twitter and Facebook, in accordance with applicable marketing laws such as the Spam Act 2003 (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, at

any time you may opt-out of receiving marketing communications from Rice Warner by using the opt-out facilities provided within the marketing communications.

Rice Warner does not share, sell, rent or disclose your personal information to other organisations other than as described in this Privacy Policy.

Contacting Us

If you have any questions about this privacy policy, would like to know more about Rice Warner's personal information principles, or if you have any concerns or would like to make a complaint regarding the treatment of your personal information, you can contact Rice Warner using the details set out below.

We treat any concerns or complaints that you may have with respect and confidentiality. A privacy representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in a timely and appropriate manner.

You can contact Rice Warner by:

- Email mail@ricewarner.com
- Phone 02 9293 3700
- Post GPO Box 5281, Sydney NSW 2001

If your concerns are not resolved to your satisfaction or you would like further information in regards to the Act, the matter can be referred to the Office of the Australian Information Commissioner on 1300 363 992.

Changes to Our Privacy Policy

Rice Warner reserves the right to change this policy from time-to-time as necessary. We encourage you to check our website for any updates to this policy.

This privacy policy was last updated on 17 July 2015.