



Privacy Policy

Australia

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Purpose

All of the Peninsula Group's Australian members (**Group or us**), which includes Peninsula Australia Pty Ltd (**Peninsula**) and its subsidiaries, must follow the Privacy Act and Australian Privacy Principles (**APPs**). This group includes: Peninsula Business Services Limited, Peninsula Business Services (Ireland) Limited, Croner Group Ltd, Croner-i Limited, Croner Taxwise, Peninsula Australia Pty Ltd (Australia), Peninsula Group NZ Limited (New Zealand), BrightHR Limited, Health Assured Ltd and Graphite HRM.

The Group handles personal information in accordance with the Privacy Act 1988 (Cth) (**Privacy Act**), including the Australian Privacy Principles (**APPs**). Personal information includes information relating to you. References in this Privacy Policy to "you" are references to the individual reading this Privacy Policy or an individual on whom the Group and / or Peninsula has collected information. References to the terms "Australian Privacy Principles", "personal information" and "sensitive information" have the meaning attributed to those terms in the Privacy Act.

Please review this website regularly as this Privacy Policy may change from time to time. A copy of the Group's Privacy Policy is available on its website.

If you are an employee of a client, please refer to the section headed 'Employee Information' below.

Collection of Information

The types of information the Group collects will depend on the nature of your dealings with the Group. The Group will only collect personal information if it is reasonably necessary for one or more of its functions or activities. The Group will generally collect personal information about you when you:

- instruct the Group to provide advice;
- visit its website;
- provide personal information via an the Group web form;
- subscribe to a newsletter or to receive the Group publications;
- apply for employment with the Group;
- attend seminar provided by the Group; and
- engage in business dealings with the Group.

If you are a client or a subscriber to the Group's mailing lists or online services, the personal information that will ordinarily be collected about you will include your name, business or residential address, email address and contact numbers.

You have the option of not providing personal information to the Group. However, if you decide not to provide the requested information, the Group may not be able to provide you with certain services.

Collection of Non-Personal Information via this Website

The Group also collects information that does not, on its own, identify an individual (non-personal information). When you visit the Group's websites, a record of your visit is made with the following information:

- your top level domain name;
 - the date and time of your visit;
 - the web pages you accessed;
 - the documents you downloaded;
 - the type of browser you are using;
 - your server address; and
 - IP address,
- on a general and aggregate basis, in order to analyse the performance of the site.

This aggregated, non-personal information is collated in order to determine the amount of people who visit the Group's website and the most frequently visited sections of the website. This enables the Group to continually update and refine its site. If you use any forms on its website to send an email to someone within the Group, a record will also be made of your email address.

When the Group combines non-personal information with personal information, the Group treats the combined information as personal information.

The Group's websites may contain links to other sites. The Group is not responsible for the privacy practices or policies of those sites.

Cookies

Our website, online services, apps and email messages may use cookies. Cookies help us to better understand user behaviour and tell us which parts of the website people have visited. The Group uses cookies to improve the navigational experience of visitors on its website by making it more user-friendly.

If you wish to disable cookies, your browser should allow you to opt out of receiving cookies. If you are not sure whether your browser has this capability, check with your service provider to find out how to disable cookies. Please note that certain features of The Group's website may not be available once cookies are disabled.

Website Analytics

Our website uses Google Analytics, a service which transmits website traffic data to Google servers in the United States. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. Peninsula uses reports provided by Google Analytics to help understand website traffic and webpage usage.

By using this website, you consent to the processing of data about you by Google in the manner described in [Google's Privacy Policy](#) and for the purposes set out above. You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or use the [opt-out service provided by Google](#).

Our website also uses interfaces with social media sites such as Facebook, LinkedIn, Twitter and others. If you choose to "like" or "share" information from this website through these services, you should review the privacy policy of that service. If you are a member of a social media site, the interfaces may allow the social media site to connect your visits to this site with other personal information.

Collection of Information in the Ordinary Course of Business

The Group may collect personal information about you in the ordinary course of its business, including your name, address, contact details and occupation. This information may be collected through meetings, face to face interviews, business cards, seminars, telephone calls and from third parties in accordance with the Privacy Act.

Monitoring of telephone calls

When the Group speaks to you on the phone, calls may be recorded for security, training and quality assurance purposes.

Sensitive Information

The Group will only collect sensitive information about you (e.g. information about your membership of a professional body, race, religion, ethnicity, political opinion or individual health information) with your consent and if the collection is reasonably necessary for one or more of its functions or activities.

Use of Personal Information

The Group may use personal information it collects about you for a number of purposes including to:

- compile statistical data and to maintain its database;
- develop/improve its website
- respond to any email inquiries;
- notify you of any upcoming training or other events;
- provide you with publications;
- manage quality control;
- manage systems administration;
- comply with compliance policies;
- provide you or your employer with advice;
- direct marketing;
- receive services from you or your employer; and
- assist with employment purposes or to consider suitability of employment.

The Group will not use or disclose your personal information for any purpose which is not related (or in the case of sensitive information, directly related) to the above purposes without your consent, or unless otherwise authorised, required or permitted under Australian law or regulation.

Direct Marketing (Disclosure of Information to External Parties)

The Group will not use or disclose personal information it holds for direct marketing purposes to any third party outside of the Group unless you consent to its use for this purpose. If you no longer wish to receive information about the Group's services, or other marketing communications, please send an email to the Group's marketing team at marketing@peninsula-au.com advising that you do not wish to receive such information.

Direct Marketing (Disclosure to Group Members)

From time to time, we may also use your information to tell you about products or services provided by the Group that we think you might be interested in.

To do this, Group Members may contact you by:

- Email;
- Phone;
- SMS;
- Social media;
- Advertising through our apps, websites, or third-party websites; and
- Mail.

The Group may use or disclose personal information it holds for direct marketing purposes to any group member. If you do not consent to this and / or you don't want to receive direct marketing messages or want to change your contact preferences, please opt out by:

- By clicking on the following [link](#).
- Calling:
 - Peninsula on 1300 696 490;
 - Bright on 1300 029 198
- Emailing:
 - marketing@peninsula-au.com
 - brightthr@peninsula-au.com

Disclosure of Personal Information

The Group may disclose your personal information in the following ways:

- on a confidential basis to external service providers that provide services such as financial or administrative services in connection with the operation of its business;
- to members of the Group for the purposes of Direct Marketing;
- to any person (where necessary) in connection with its services, such as to regulatory authorities, partners or advisors; or
- to related entities of the Group overseas, including in the UK, Canada and New Zealand, but in all such cases in accordance with the AAPs.

Examples of services provided by external service providers include mailing houses, payment processors, archiving services, research organisations and consultants who conduct research on behalf of the Group so it can better meet the needs of clients and staff.

If the Group engages external service providers, it will take reasonable steps to ensure those entities comply with their obligations under the APPs when they handle your personal information. The Group

will also ensure external service providers are only authorised to use personal information for the limited purposes specified in the Group's agreement with them.

The Group will also take reasonable steps to ensure that any overseas related entities or service providers comply with the applicable sections of the APPs in relation to how your personal information is held, managed and accessed.

Employee Information

The Group may collect the following personal information about an individual employed (**Employee**) by a client (**Employer**) of the Group member:

- name and address;
- date of birth;
- job title;
- immigration status details;
- tax file number;
- terms and conditions of employment including employee benefits; and
- information relating to employment (ie absentee records, development records, annual and personal/carer's leave entitlement, disciplinary and grievance matters).

This information may include sensitive information (including information relating to an employee's health or ethnic origin).

Any information about Employees will be collected and stored at the request of, and with the consent of, the Group's clients. Clients may collect, store, use and disclose this information for the purpose of staff administration and management, equal opportunities monitoring and other employment related matters. The Group's staff may also use information collected in the provision of its services. An Employee's personal information will only be used for purposes related to (or in the case of sensitive information, directly related to) their employment relationship, or as otherwise authorised, required or permitted under law, or for another purpose to which the employee consents.

The Group will not disclose any Employee's personal information to third parties without consent from the Employee, unless such disclosure is to a government body, regulator, law enforcement agency or other party required, authorised or permitted under law.

Employees may request copies of their personal information, request amendments to their information and make a complaint in accordance with this Privacy Policy.

Access and amendment requests

If you wish to obtain access to any personal information that the Group has collected about you, please make a request in writing to the Group's Compliance and Risk Team compliance.risk@peninsula-au.com. A reasonable fee may apply for the provision of this information (ordinarily, an electronic print out or photocopy). Identification will be requested for security purposes.

The Group will take reasonable steps to make sure that any personal information it collects, uses or discloses is accurate, complete and up-to-date. If you believe that any information held by the Group is inaccurate, incomplete, out of date, irrelevant or misleading, please contact the Group's Compliance and Risk Team compliance.risk@peninsula-au.com.

Request for access and/or amendments will be responded to within a reasonable period of time in accordance with the APPs. The Group will notify the Employer if the Group receives a request from an Employee. The Group may refuse a request for access or amendment to personal information in the

circumstances outlined in the APPs. If access is refused, the Group will provide you with a written reason for the refusal.

Complaints

If you have any complaints about the Group's dealings with your personal information, including any breaches by the Group of the APPs, please email the Group's Compliance and Risk Team with:

- (a) details of your complaint including relevant dates and names of third parties (if any); and
- (b) provide any relevant documents or correspondence.

The Group will acknowledge receipt of your complaint within two days and investigate the issue. The Group will advise you in writing of the outcome of the investigation within a reasonable period of time in accordance with the APPs. If you are not satisfied with the outcome, the Group will advise you of further options including, if appropriate, review by the Privacy Commissioner within the Office of the Australian Information Commissioner (see <http://www.oaic.gov.au/> for further information).

Storage and Security of Personal Information

The Group takes all reasonable steps to ensure that personal information is kept secure and protected against unauthorised access, modification or disclosure and from misuse, interference and loss.

Any information which the Group holds is stored on secure servers, either in Australia and/or overseas (UK, Canada and New Zealand), that are protected in controlled facilities. Only certain authorised employees of the Group and/or contractors who provide services in relation to its information systems will have access to the secure servers.

Although the Group have put in place certain checks and measures in relation to system security, the Group cannot guarantee that data transmitted over the internet will be 100% secure. The Group will not be responsible for the security of information you send to, or receive from the Group, over the internet.

In the event of a data breach, the Group is committed to complying with the requirements of all the Privacy Laws and where required, the provisions of the General Data Protection Regulation.

Data Retention

The Group retains information you provide to it and information which it collects about you, including personal information, for as long as the Group continues to provide services to you and specifically until such time as you request the Group to delete your personal information. The Group will retain all information relating to services provided to clients for a minimum of seven years after the date that a client ceases to use its services.

How to Contact the Group

If you have any questions about this Privacy Policy or Peninsula's privacy practices, please contact the Peninsula' Compliance and Risk Team (details below). If you have any questions about this Privacy Policy or Peninsula's privacy practices, please contact Peninsula's Compliance and Risk Team (details below):

Compliance and Risk Team
Ph: 1300 696 490
E: compliance.risk@peninsula-au.com

Alternatively, you can write to us at:

Peninsula, Compliance and Risk Team
Level 6, 180 Thomas Street
Haymarket NSW 2000
Australia





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Peninsula Australia Pty Limited

Level 6, 180 Thomas Street, Sydney NSW 2000, Australia

www.peninsulagrouplimited.com.au