

# Privacy Policy

12 March 2013

## 1 PRIVACY MATTERS TO US

We respect your privacy. Grosvenor Management Consulting Pty Ltd (referred to as "Grosvenor" or "We" in this Privacy Policy) have developed this Privacy Policy to inform you of how we protect the Personal Information that we Collect, Use, Disclose and keep secure. It also covers how Grosvenor makes the Personal Information it holds available for access to and correction by you.

This Privacy Policy has been drafted having regard to Grosvenor's obligations under the *Privacy Act 1988* (Cth) and the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* which includes the Australian Privacy Principles (collectively, the Privacy Act). This Privacy Policy is a public document and has been prepared in light of Australian Privacy Principle 1 - Open and Transparent Management of Personal Information.

Please read this Privacy Policy. By using the Grosvenor Website, or by receiving notification from Grosvenor of how you may access this Privacy Policy, whether by phone, email or otherwise, you are consenting to the Collection, Use and Disclosure of your Personal Information as set forth in this Privacy Policy.

## 2 COLLECTION OF YOUR INFORMATION

Grosvenor Collects Personal Information about customers, prospective customers, vendors, prospective vendors, and contractors which is reasonably necessary for, or directly related to, one or more of its functions or activities. The Personal Information may be collected through our Website, over the phone, or otherwise.

At or before the time, or, if that is not practicable, as soon as practicable after, we Collect your Personal Information, we will notify you of the matters required pursuant to Australian Privacy Principle 5 – Notification of the Collection of Personal Information, by providing you with this Privacy Policy, or by notifying you of how you may access this Privacy Policy.

Grosvenor will not Collect Personal Information secretly or in an underhanded way and will not sell your Personal Information to any third party.

Grosvenor may, from time to time, Collect Sensitive Information from you, and unless a legal exemption applies will not Collect Sensitive Information from you without your consent.

## 3 HOW WE USE YOUR INFORMATION AND WHEN WE MAY DISCLOSE IT

Grosvenor holds Personal Information which it has Collected to Use and/or Disclose for its Primary Purposes, including but not limited to:

- providing you with the services requested from us
- answering your inquiry;
- sending you additional materials relating to Grosvenor and services that may be of interest to you; and
- providing you with effective customer service.

Grosvenor also holds Personal Information which it Uses and/or Discloses for purposes other than its Primary Purposes (Secondary Purposes). You provide your consent to us using your Personal Information for the following Secondary Purposes:

- billing and account management;
- business planning and product development;
- providing you with relevant information, including promotions, about the products and services of Grosvenor and its affiliates;
- enabling us to better understand your needs and interests;
- improving the content, functionality and usability of our Website;
- improving our marketing and promotional efforts;
- issues, news or other information relevant to your dealings with Grosvenor, or about Grosvenor generally, or the industries in which you or Grosvenor operates; and
- as otherwise described in this Privacy Policy.

From time to time we may Disclose your Personal Information to organisations outside of Grosvenor in order to deliver the services you require or if required for other legal reasons. Your Personal Information is Disclosed to these organisations in relation to us providing our services to you or to meet such other legal requirements. These organisations carry out, amongst other services, our:

- information technology services;
- marketing and communication services (including market research);
- website usage analysis;
- to support or facilitate any of those activities described above; and
- our advisers and insurers.

We will take reasonable practicable steps to ensure that these organisations are bound by confidentiality and privacy obligations in relation to the protection of your Personal Information.

## 4 DIRECT MARKETING

You consent to Grosvenor Using and/or Disclosing any Personal Information Collected from you for Direct Marketing purposes, whether Collected via telephone, the Website, or otherwise, but subject to the terms of this Privacy Policy.

Unless otherwise provided in this Privacy Policy and in accordance with the Privacy Act, Grosvenor retains the right to Use and Disclose your Personal Information for Direct Marketing purposes:

- that has been Collected from you in circumstances where:
  - you have provided consent to do so; or
  - it is within your Reasonable Expectations; or
  - where it is impracticable to obtain your consent;
- that has been Collected from any third party in circumstances where:
  - you have provided consent to do so; or
  - it is impracticable to obtain your consent.

In each Direct Marketing communication, we will include a:

- prominent statement appearing on the relevant piece of marketing material notifying you of your right to Opt Out from further Direct Marketing; and
- simple means for you to Opt Out of receiving further Direct Marketing communications of that kind.

Should you Opt Out, we will stop Using and/or Disclosing your Personal Information for Direct Marketing purposes.

Grosvenor will not Use your Sensitive Information for Direct Marketing purposes.

## 5 ENSURING INFORMATION IS ACCURATE AND UP-TO-DATE

We take reasonable precautions to ensure that the Personal Information we Collect, Use and Disclose is complete, relevant and up-to-date.

However, the accuracy of that information depends to a large extent on the information you provide. That's why we recommend that you:

- let us know if there are any errors in your Personal Information; and
- keep us up-to-date with changes to your Personal Information. You may change your personal details by using the relevant facility on our

Website or by contacting Grosvenor via the contact details described in this Privacy Policy.

## 6 HOW WE PROTECT YOUR INFORMATION

Grosvenor will take reasonable steps to protect your Personal Information from misuse, interference, loss and unauthorised access or disclosure. This may include taking reasonable steps to destroy or permanently de-identify Personal Information once it is no longer needed for any purpose for which it may be Used or Disclosed in accordance with Australian Privacy Principle 11.2, subject to the exceptions contained therein.

Grosvenor will not attempt to match de-identified or anonymous data Collected through surveys or such online devices as "cookies", with information identifying an individual, without the consent of the relevant individual.

Grosvenor requires employees and contractors to perform their duties in a manner that is consistent with Grosvenor' legal responsibilities in relation to privacy, including those in this Privacy Policy.

Grosvenor will take reasonable steps to ensure that Personal Information is only accessible by people who have a genuine "need to know" as well as "right to know."

## 7 HOW YOU CAN ACCESS OR CORRECT YOUR INFORMATION

Grosvenor will permit its records containing your Personal Information to be accessed by you when required by the Privacy Act.

If Grosvenor is satisfied that:

- having regard to the purpose for which the information is held, the information is inaccurate, out of date, incomplete or irrelevant or misleading; or
- you (as the person to whom the Personal Information relates) request that we correct the information;

we will take reasonable steps to correct our records containing your Personal Information as soon as practically possible in accordance with the Privacy Act.

If you wish to lodge a request to access and/or correct your Personal Information you may do so by contacting Grosvenor via the contact details described in this Privacy Policy.

## 8 STAYING ANONYMOUS

Grosvenor will not make it mandatory for visitors to its Website to provide Personal Information unless such Personal Information is required to answer an inquiry or provide a service. Grosvenor may however request visitors to provide Personal Information voluntarily to Grosvenor (for example, as part of a competition or questionnaire).

Grosvenor will allow you to transact with it anonymously or by using a pseudonym wherever that is reasonable and practicable.

## 9 TRANSFERRING INFORMATION OVERSEAS

Grosvenor will only send Personal Information overseas if:

- you are Expressly Informed of the intended disclosure of your Personal Information to the overseas recipient, and you provide consent accordingly; or
- the Disclosure is required or authorised by an Australian court or tribunal or under Australian law.

## 10 CHANGES TO THE PRIVACY POLICY

Grosvenor may, in its sole discretion, update this Privacy Policy at any time and from time to time. Any changes will be effective when posted on the Website. Your continued use of the Website will indicate your acceptance of any changes to the Privacy Policy.

All Personal Information, Collected both before and after any changes take effect, will be subject to the terms of the then current policy, for which you will be taken to have provided consent, unless you indicate otherwise by contacting Grosvenor via the contact details described in this Privacy Policy. We encourage you to refer back to this page and especially prior to providing us with any Personal Information.

## 11 GLOSSARY

**Collect** means gather, acquire or obtain by a lawful and fair means, information in circumstances where the individual is identifiable or identified.

**Direct Marketing** involves the Use and/ or Disclosure of Personal Information to communicate directly with an individual to promote goods or services through written, verbal or electronic means of communication. The goods or services which are marketed may be those of Grosvenor or a Related Body Corporate or those of an independent third party organisation.

**Disclosure** generally means the release of information outside Grosvenor, including under a contract to carry out an "outsourced function."

**Expressly Informed** means the circumstance where we have provided you with a clear statement (either verbal or in writing) of the fact that that we will not be accountable under the Privacy Act and you will not be able to seek redress under the Privacy Act in the event that you provide consent to the disclosure of your Personal Information by us to an overseas recipient and the overseas recipient handles your Personal information in breach of the Privacy Act.

**Opt Out** means an individual's expressed request not to receive Direct Marketing communications.

**Personal Information** means information that is not Sensitive Information, including information or an opinion (whether information or an opinion forming part of a database), whether true or not and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained from the information or opinion. This includes, but is not limited to, an individual's name, address, telephone number and email address.

**Primary Purpose** is the main reason for the Collection of any Personal Information.

**Reasonable Expectation** means an individual's reasonable expectation that their personal information might be Used or Disclosed for the relevant purpose.

**Related Body Corporate** is given its meaning in the Corporations Act 2001 (Cth).

**Secondary Purpose** means a purpose of Use or Disclosure other than a Primary Purpose.

**Sensitive Information** is given its meaning in section 6(1) of the Privacy Act 1988 (Cth).

**Use** means the handling of Personal Information within Grosvenor.

**Website** means the website of Grosvenor and related webpages.

## 12 CONTACTING GROSVENOR

If you have questions concerning this Privacy Policy, please contact us on:

- 02 6274 9200 between 9:00am and 5pm EST Monday to Friday; or
- via email at [grosvenor@grosvenor.com.au](mailto:grosvenor@grosvenor.com.au); or
- by writing to the In House Legal Adviser, Grosvenor Management Consulting, Level 7, 15 London Circuit, Canberra, ACT, 2601.

You can obtain further information about your privacy rights and the Privacy Act from the Office of the Australian Information Commissioner by visiting their web site at [www.privacy.gov.au](http://www.privacy.gov.au).

This Privacy Policy was last updated on 12 March 2014.