

## PRIVACY POLICY

This Privacy Policy applies to Denomination Pty Ltd ACN 099 619 271 trading as Denomination and each of its related bodies corporate (as defined in the Corporations Act 2001 (Cth)), collectively referred to as “Denomination”, “we”, or “us”.

Denomination is subject to the Australian Privacy Principles (**APP**) under the *Privacy Act 1988* (Cth) (**Privacy Act**), and we will treat your personal information in accordance with those principles. This policy describes the way that Denomination collects, holds, discloses and protects personal information. For further information, or to request a copy of this policy in a different format, please contact our Managing Director at the address listed below.

### Data Collection

We will primarily collect personal information directly from you, or from your authorised representatives. We may also collect personal information from third parties such as regulatory authorities, your employer, other organisations with whom you have dealings, government agencies, credit reporting agencies, recruitment agencies, information or service providers or publicly available records.

The types of personal information that we collect and hold is influenced by the nature of our dealings with you. For example, we may collect current and historical personal information including your name, contact details, identification, organisation, employment, positions held and enquiry/complaint details. We may also collect personal information about your other dealings with us and our clients, including any contact we have with you by telephone, email or online.

We may collect personal information about you when you:

- Request us to provide you with services;
- Attend an event hosted or sponsored by us;
- Contact us directly;
- Supply products or services to us; or
- Apply for or register your interest in employment with us.

In the event that we are provided with unsolicited personal information, we will handle such information in accordance with the law, including by destroying or de-identifying such information as required by law.

### Careers and recruitment

If you apply to Denomination for a job, you may need to provide information about your education, employment, racial background and state of health. Your application will constitute your express consent to our use of this information to assess your application and to allow us to carry out any monitoring activities which may be required of us under applicable law as an employer. We may also carry out screening checks (including reference, background, directorship, financial probity, identity, eligibility to work, vocational suitability and criminal record checks) and consider you for other positions. We may exchange your personal information with academic institutions, recruiters, screening check providers, health service providers, professional and trade associations, law enforcement

agencies, referees and your current and previous employers. Without your personal information we may not be able to progress considering you for positions with us.

### **Sensitive Information**

Some of the information we collect, for example in the recruitment context outlined above, may be sensitive information. Sensitive information includes racial or ethnic origin, criminal record, court records, medical records, disability status or health information. We will only collect sensitive information about you with your consent or when permissible under Australian law, and will only use this information for a legitimate purpose where it is reasonably necessary.

### **Use of Information**

The information that you provide to us will be generally used to:

- provide services to you;
- to maintain and update our records;
- to maintain our relationship with you;
- assess your suitability for a position of employment; or
- keep you informed of relevant activities and offers from Denomination.

### **Disclosure of information**

We do not sell or trade personal information about you to or with third parties.

We may use your personal information to send you promotional material in relation to our services from time to time. If we do so, we will provide you with the option to opt-out of receiving this material.

On occasions, we may disclose your personal information to another person, such as experts or consultants, regulatory bodies or external service providers. Where we do so, disclosure will be as permitted under the Australian Privacy Principles and/or with your consent if required.

### **Access and Correction of information**

Under the Privacy Act we have a duty to ensure that your personal information is accurate and up to date, and you are entitled to access the information we hold about you and request that it be corrected or updated. You may request access or correction by contacting our Managing Director at the address listed below.

### **Cookies**

When you visit our website, we collect general anonymous information (such as your browser type, information downloaded, pages visited and the domain name and country from which you request information) periodically for statistical and website development purposes.

Our website may use 'cookies' to identify the areas of our website that you have visited. Cookies are small text files stored on your computer or mobile device by your web browser. Cookies are used to personalise the content that you can see on our website.

## Security

We value the security and confidentiality of the personal information we collect and hold about you. In securing your information, we employ physical, electronic and managerial security procedures including:

- storage of information in an electronic database access to which is limited; and
- Secured offices and data storage.

We will retain your personal information while it is required for our business functions, or for any other lawful purpose.

When we no longer need to retain your personal information for the purposes outlined above or as required by law, we will destroy or de-identify the information.

## Complaints

If you believe that we have breached our obligations under the Privacy Act, or you have any complaint regarding the treatment of your personal information by us, please contact our Managing Director using the contact details below. We will make every endeavour to respond to your request promptly.

If we have not responded to your complaint within 30 days, you can make a complaint to the Office of the Australian Information Commissioner about the handling of your personal information.

## Updates

This privacy policy will be updated periodically and the most recent version will be published on this webpage. Our policy was last updated on 24 July 2019.

## Contact

**Managing Director:** Rowena Curlewis  
**Telephone:** +61 403 764 734  
**Email:** rowena@denomination.com  
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