

## PRIVACY POLICY

Pursuant to the Privacy Act (1988) (C'th) and the National Privacy Principles

This Privacy Policy applies to each of the offices of Ryan Carlisle Thomas (in association with Stringer Clark), throughout Victoria and to its related bodies corporate including RCT Administrative Services Pty Ltd.

Ryan Carlisle Thomas (in association with Stringer Clark) and its related bodies corporate, collectively referred to in this Policy as "RCT", carry on business as Lawyers and Consultants, and are bound by the privacy code as laid out in the Privacy Amendment (Private Sector) Act 2000 (the Privacy Act). In order to carry on its business, RCT collects personal information from or on behalf of or in relation to its clients for the purpose of pursuing its clients' legal rights or providing legal and associated advice. This information is collected by RCT's partners, consultants and employees.

Under the privacy code, personal information includes all information or opinion about a client, and sensitive information is defined as a subset of this. Sensitive information includes information or opinion about a client's membership of a trade union, sexual preferences or practices, criminal record, or personal health information.

RCT's Policy as to the collection, use, disclosure, security and access to such information is as follows:

### COLLECTION

Personal information collected may include a client's:

- title, name and gender
- contact details (address, phone and e-mail)
- date of birth
- employer and occupation
- tax file number
- health status
- other appropriate personal information necessary to carry out RCT's business as Lawyers and Consultants in providing legal advice and assistance which may include health information, financial information and other information relevant to such matters.

Personal information is collected either directly from clients in conference or by telephone, letter, fax, e-mail, or where necessary or appropriate, from third parties such as employers and past employers, Government agencies, statistical sources etc.

RCT will not collect sensitive information about a client unless:

- The client has consented;
- The collection is required by law;
- The collection is otherwise permitted by the National Privacy Principles.

## DATA QUALITY

RCT is under an obligation to take reasonable steps to ensure that personal information is accurate, complete and up-to-date. If the personal information you have given us has changed or new personal information is available, failure to advise us as soon as possible will effect our capacity to properly advise you and may damage your interests.

## SECURITY

Your personal information is stored in either paper or electronic form and is physically secured at the premises in which RCT carries on our business. We have security systems at each office location. Personal information kept electronically is secured by user identifiers and passwords accessed only by authorised personnel, and is handled with care.

## ARCHIVES

Completed files are maintained in a secure facility which can only be accessed by RCT authorised personnel.

RCT will continue to monitor and review its security arrangements and ensure staff and management are made aware of organisational systems for the processing, storing and transmitting of personal information and the protective security policies associated with this.

## DISCLOSURE

RCT uses or discloses personal information about its clients for the primary purpose for which the information is collected. Personal information will not be used or disclosed for a secondary (related) purpose except in accordance with the National Privacy Principles.

RCT may use or disclose personal information for a secondary purpose where the secondary purpose is related to the primary purpose of collection (or, if the personal information is sensitive information, directly related to the primary purpose of collection) and the client concerned would reasonably expect RCT to use or disclose the information for that secondary purpose.

RCT may also use or disclose personal information about a client for a secondary purpose if it has obtained the client's consent (either express or implied consent).

It may be necessary to disclose sensitive information for the purposes of dealing with specific legal claims or proceedings. RCT may also be required or authorised to provide personal and/or sensitive information under law such as pursuant to specific legislation, and may otherwise be required to provide such information in the course of

criminal investigations or procedures. In these circumstances information will only be released in accordance with the requirements of the law. Where such information is disclosed it will be recorded in writing unless the law requires that it not be so recorded.

No personal information will be disclosed to third parties for the purposes of direct marketing. Personal information such as names and addresses may be used to forward to you legal information in the form of journals, newsletters or circular letters. If you do not wish to receive such information your name and address will be removed from our mailing list for these purposes upon request.

## ACCESS

With certain exceptions, you have a right to access all of your personal information held by RCT. RCT will provide you with access to your personal information within a reasonable time upon receipt of your written request. Your request should identify whether you wish to access all of the personal information held about you or only part of that information. RCT is entitled to recover the reasonable costs of providing you with this access.

In some circumstances (for example, where an investigation for fraud is being conducted) you may not have access to your personal information. In circumstances where access is refused, RCT will advise you in writing of the reasons for the refusal.

Where RCT uses a service provider (e.g. a costs consultant or mailing house) and it is necessary to provide your personal information to the service provider, you will be informed of such disclosure when required by the National Privacy Principles. Personal information may be disclosed to contracted service providers such as lawyers, accountants, auditors or cost consultants however this will only be done in accordance with privacy legislation and this policy.

## WEBSITE PRIVACY STATEMENT

This statement governs the handling of information obtained by the use of the RCT's website. If you choose to visit, register or submit information via that site then data will be dealt with in accordance with this statement.

Our website privacy arrangements are as follows:-

- We only collect information about you when you provide it to us in order to, for example:
  - make an enquiry
  - have us contact you
  - submit a resume or other material
  - provide feedback.
- Our website has links to other sites. These are not part of RCT and you will need to contact them about their privacy policy.

- We will take reasonable steps to secure information you provide to us via the website. However because of the nature of the internet, the security of information you transferred cannot be ensured and you send such information at your own risk.
- We may use 'cookies' or 'web beacons' to collect data for aggregation in order to analyse the use of our website. These systems do not collect personal information such as your name or email address. You can disable 'cookies' on your internet browser.
- We apply our privacy policy to the collection, use and storage of information obtained via our website.

## QUERIES CONCERNING ACCESS AND COMPLAINTS PROCEDURE

If you have a complaint about the manner in which your personal information has been handled or where access to personal information has been limited or denied, you may make a complaint in writing to:

The Privacy Officer  
Ryan Carlisle Thomas  
41 Robinson Street  
Dandenong Vic 3175

Your complaint should set out the full details of the nature of the complaint. If your complaint has not been resolved to your satisfaction within a reasonable time, you have a right to refer it to the Privacy Commissioner whose address is as follows:

The Privacy Commissioner  
GPO Box 5218  
Sydney NSW 1042