

PRIVACY POLICY

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1 Purpose

1.1 The Protection of Information Policy (the Policy) details ADhesive Communication's (ADhesive Communication/we/us) commitment to a culture that protects privacy and the personal information it collects, stores, discloses and uses. The policy outlines how ADhesive Communication will adopt best practice in the management of personal information.

2 Definitions

2.1 **Access** means providing to an individual, information about themselves that is held by ADhesive Communication. This may include allowing that individual to inspect personal information or to obtain a copy;

2.2 **Collection** means gathering, acquiring or obtaining personal information from any source and by any means, including information ADhesive Communication has come across by accident or has not asked for;

2.3 **Consent** means voluntary agreement to some act, practice or purpose;

2.4 **Disclosure** means the release of information to persons or organisations outside of ADhesive Communication. It does not include giving individuals information about themselves;

2.5 **Personal Information** means information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about a natural living person whose identity is apparent, or can reasonably be ascertained, from the information or opinion, including a photograph or other pictorial representation of a person;

but does **not** include information that is:

- in generally available publications;
- in material kept in public records and archives such as the Commonwealth or State archives; or
- in anything kept in a library, art gallery or museum for the purpose of reference, study or exhibition.

2.6 **Privacy Act** means the Privacy Act 1988;

2.7 **Sensitive Information** means information or an opinion about an individual's

- racial or ethnic origin;
- political opinions;
- membership of a political association, a professional or trade association or a trade union;
- religious beliefs or affirmations;
- philosophical beliefs;
- sexual preferences or practices;
- criminal record;
- health; or

- any other information a reasonable person would consider to be private

2.8 **Use** means the handling of personal information within ADhesive Communication including the inclusion of information in a publication.

3 Scope

3.1 The Policy covers all ADhesive Communication departments.

4 Legislative and Corporate Requirements

4.1 The Privacy Act sets out the principles, which must be followed by Commonwealth Government agencies and many private organisations in relation to the collection, maintenance and use of personal information.

4.2 The provisions of the Privacy Act do not apply to Jigsoar Media. However, in collecting, using, storing and disclosing personal information, ADhesive Communication acknowledges the Australian Privacy Principles contained within the Privacy Act set an appropriate standard for privacy protection and the Policy is intended to achieve “best practice” consistency with those standards.

5 Policy Statement

5.1 It is ADhesive Communication’s policy to have in place adequate systems of internal controls, which promote a high level of integrity in protecting personal information.

These controls over personal information relate to:

- Collection and use of personal information
- Distribution of personal information
- Maintenance and storage of personal information
- Disability claims and financial hardship applications
- Access to personal information
- Suppression of personal information

6 Collection and Use of Personal Information

6.1 All personal information collected by ADhesive Communication is to be used only for the purpose of conducting business in accordance with the provision of ADhesive Communication services.

6.2 The type of personal information collected and held will depend on the services provided, but may include:

- Telephone numbers
- Name and address (postal, residential, and email addresses)
- Age &/or date of birth

6.3 All information will be collected in a fair and lawful manner and as required/permitted by legislation. ADhesive Communication is committed to ensuring individuals are aware of the purpose of collection of the information and aware that the collection is authorised or required by law.

6.4 In satisfying the collection and use of personal information obligations, ADhesive Communication assumes that:

- (a) any personal information provided is free from errors and omissions, is not misleading or deceptive and complies with all relevant laws; and
- (b) individuals have the necessary authority to provide any personal information submitted to ADhesive Communication;

6.5 It is the responsibility of individuals to provide ADhesive Communication with details of any changes to their personal information as soon as reasonably practicable.

6.7 ADhesive Communication will make every effort to ensure that its records of an individual's personal information are up to date and accurate.

6.8 ADhesive Communication does not track individuals Internet activity when they visit ADhesive Communication's web site. ADhesive Communication will only collect an individual's email address to respond to their enquiry if they choose to contact ADhesive Communication via the Internet.

7 Distribution of Personal Information

7.1 ADhesive Communication will not provide personal information it holds on individuals to third parties, except:

7.1.1 where the individual has made a written request for personal information to be provided to a third party;

7.1.2 where the provision of personal information is for the purpose of distributing materials for the sole purpose of and on behalf of ADhesive Communication

7.1.3 where ADhesive Communication is required by legislation to provide personal information to a third party

7.1.4 where the individual has been advised of ADhesive Communication's usual practice of disclosing personal information to that third party or a third party of that type for a particular purpose and the disclosure is consistent with that purpose.

7.2 Before ADhesive Communication provides personal information to a third-party service provider that is subject to the provisions of the Privacy Act, that supplier will be required to provide a signed Privacy Undertaking to ADhesive Communication that it will comply with the Privacy Act and the Australian Privacy Principles in respect to the collection, use and handling of personal information supplied by ADhesive Communication.

7.3 ADhesive Communication may supply personal information about an individual as part of a standard communication or pursuant to a request made by that individual.

7.4 ADhesive Communication does not accept any responsibility for any loss or damage suffered by individuals because of their reliance on any personal information

provided to them by ADhesive Communication or because of ADhesive Communication's inability to provide individuals with any requested personal information.

8 Maintenance and Storage of Personal Information

8.1 ADhesive Communication will take reasonable steps to protect the personal information it holds from loss, unauthorised access, use, modification, disclosure and other misuse, and to maintain systems to ensure that all personal information collected is up to date, accurate and complete.

9 Access to Personal Information

9.1 Individuals who wish to access the personal information ADhesive Communication holds in relation to them can do so by contacting the Director. These requests will be dealt with as soon as is reasonably practicable, having regard to the nature of the information requested. The person making the request will need to satisfy Customer Services Staff as to their identity.

9.2 If an individual can show that the personal information held by ADhesive Communication is not accurate or complete, it will be amended by the Director.

10 Complaints

10.1 Individuals who have any concerns regarding how ADhesive Communication handles personal information, or require further information should contact ADhesive Communication in the first instance.

11 Review

11.1 The Policy will be reviewed as required by ADhesive Communication or as required by legislation.

12 Access to the Policy

12.1 The Policy is available on request from ADhesive Communication.

13 Further Information

13.1 For further information about this policy please contact:

The Director
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