
ADHESIVE

Communication that **sticks**

PRIVACY POLICY

ADhesive Communication Pty Ltd

Effective: May 2026

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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 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 (Cth), as amended from time to time including by the Privacy and Other Legislation Amendment Act 2024.

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.

2.9 Eligible Data Breach means a data breach that is likely to result in serious harm to one or more individuals whose information is involved, as defined under the Notifiable Data Breaches scheme (Part IIIC of the Privacy Act).

2.10 Automated Decision-Making means any use of algorithms, artificial intelligence, or automated tools that make or significantly influence decisions.

3 Scope

3.1 The Policy covers all ADhesive Communication departments, staff, contractors, and third-party service providers who handle personal information on behalf of ADhesive Communication.

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 ADhesive Communication acknowledges the Australian Privacy Principles (APPs) contained within the Privacy Act, as amended by the Privacy and Other Legislation Amendment Act 2024, set an appropriate standard for privacy protection. This 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
- Access to personal information
- Notifiable data breach response
- Automated decision-making disclosure
- Children's privacy
- 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 and/or date of birth
- Business contact details
- Any other information provided by clients, suppliers or individuals in the course of our business relationship

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

- any personal information provided is free from errors and omissions, is not misleading or deceptive and complies with all relevant laws; and
- 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.

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

6.7 Adhesive Communication's website may use standard web analytics tools (such as cookies or session tracking) to improve user experience. Where such tracking occurs, individuals will be notified and provided with the ability to opt out. 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.

6.8 Data Retention. Adhesive Communication will retain personal information only for as long as necessary to fulfil the purpose for which it was collected, or as required by law. General client and contact records are retained for a period of seven (7) years from the end of the business relationship, after which they will be securely destroyed or de-identified.

6.9 Children's Privacy. Adhesive Communication does not knowingly collect personal information from individuals under the age of 18 without verifiable parental or guardian consent. Where Adhesive Communication becomes aware that personal information has been collected from a minor without appropriate consent, it will take prompt steps to delete or de-identify that information. Where Adhesive Communication conducts or supports campaigns directed at younger audiences on behalf of clients, it will advise those clients of applicable legal requirements.

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; or

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 confirming it will comply with the Privacy Act and the Australian Privacy Principles in respect of 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.

7.5 Overseas Disclosure. In the course of providing services, Adhesive Communication may use third-party platforms and cloud-based tools that store or process data on servers located outside Australia. These may include services such as Google Workspace (United States), Meta Business Suite (United States), and other marketing and productivity platforms. By providing personal information to Adhesive Communication, individuals acknowledge that their information may be disclosed to overseas recipients in these countries. Adhesive Communication takes reasonable steps to ensure that overseas

recipients handle personal information in a manner consistent with the Australian Privacy Principles (APP 8).

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.

8.2 Where ADhesive Communication uses third-party cloud storage or software platforms to store personal information, it will take reasonable steps to assess the security practices of those providers prior to use and require them to maintain appropriate security standards.

9 Notifiable Data Breaches

9.1 ADhesive Communication is committed to complying with the Notifiable Data Breaches (NDB) scheme under Part IIIC of the Privacy Act.

9.2 In the event of an Eligible Data Breach, ADhesive Communication will:

- Contain the breach and assess the likely risk of serious harm to affected individuals;
- Notify the Office of the Australian Information Commissioner (OAIC) as soon as practicable, and in any case within 72 hours of becoming aware of the breach;
- Notify affected individuals directly where it is practicable to do so, or via a public statement where direct notification is not practicable; and
- Take corrective action to prevent future recurrence.

9.3 ADhesive Communication maintains an internal data breach response plan that is reviewed annually. Staff are trained on their obligations to report suspected breaches to the Director without delay.

10 Automated Decision-Making and Use of Artificial Intelligence

10.1 ADhesive Communication uses artificial intelligence (AI) tools and automated systems internally to support its operations, including but not limited to content creation, campaign analytics, scheduling and business administration. Where these tools process personal information, ADhesive Communication ensures that their use is consistent with this Policy and the Australian Privacy Principles.

10.2 ADhesive Communication does not use fully automated decision-making processes that produce legal or similarly significant effects on individuals without human review. Where AI tools contribute to decisions that may affect individuals, a staff member reviews the outcome before action is taken.

10.3 Individuals may request information about whether automated tools were used in any decision that affected them by contacting the Director. Where reasonably practicable, ADhesive Communication will provide a plain-language explanation of the role of any automated process.

11 Direct Marketing

11.1 ADhesive Communication may use personal information to send direct marketing communications (including email, SMS, or postal communications) where the individual has consented to receiving such communications, or where it is otherwise permitted under the Privacy Act and the Spam Act 2003 (Cth).

11.2 Individuals may opt out of receiving direct marketing communications at any time by:

- Using the unsubscribe link included in any electronic marketing communication;
- Contacting ADhesive Communication at hello@adhesive.com.au; or
- Writing to the Director at the address listed in clause 16.

11.3 ADhesive Communication will action opt-out requests promptly and within 5 business days.

12 Access to Personal Information

12.1 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 verify their identity to the satisfaction of ADhesive Communication staff.

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

12.3 Individuals may also request the deletion or de-identification of their personal information where ADhesive Communication is no longer required by law to retain it, and where deletion would not unreasonably affect the provision of services. Such requests will be considered by the Director and a response provided within 30 days.

13 Complaints

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

13.2 ADhesive Communication will acknowledge receipt of a privacy complaint within 5 business days and aim to resolve the matter within 30 days. If the individual is not satisfied with the outcome, they may lodge a complaint with the Office of the Australian Information Commissioner (OAIC) at www.oaic.gov.au or by calling 1300 363 992.

14 Review

14.1 This Policy will be reviewed at least annually, or as required by changes to ADhesive Communication's operations or relevant legislation.

15 Access to the Policy

15.1 This Policy is available on request from ADhesive Communication and may be published on ADhesive Communication's website.

16 Further Information

16.1 For further information about this policy please contact:

The Director

ADhesive Communication

2/159 Aumuller Street, Cairns QLD 4870

hello@adhesive.com.au