

Cliftons Privacy Statement

Privacy Statement

Please be aware Cliftons is collecting the requested information and saving it in our secure data management system so that we may have further communication with you. If we do not collect this information we will not be able to contact you. This information will not be shared with anyone outside Cliftons. It is used so we can contact you about your booking requirements and from time to time update you with invitations to events and special offers available to our customers. You can opt out of correspondence with us at anytime. If you would like to find out more about our Privacy Policy please go to www.cliftons.com and click on the 'Privacy Policy' link. If you have any questions or concerns over the information that is being collected please contact our Privacy Officer on (02) 9250 0995.

Cliftons Privacy & Security Policy

Cliftons Operations Pty Ltd (Cliftons) and our affiliated companies recognise the importance of the privacy and security of your personal details. The following Privacy Policy indicates our minimum privacy standards for handling your Personal Information including internal and external practices.

Cliftons conducts these procedures to comply with the guidelines issued under the Australian Privacy Act 1988 and the Australian Privacy Principles (APPs) as described in the Privacy Amendment (Enhancing Privacy Protection) Act 2012, as well as relevant international privacy standards and guidelines.

All incidents of breach in relation to this policy should be reported to the Privacy Officer in the first instance. Unauthorised disclosure of Cliftons information including the misuse of intellectual property belonging to Cliftons is prohibited.

Australian Privacy Principle 1 – Open and transparent management of personal information

Kinds of information collected

All information collected by Cliftons is for the purpose of providing a high quality service to anyone visiting a Cliftons facility including Cliftons clients and their students.

The kinds of information collected and held by Cliftons when accessing any Cliftons services may include:

- Full name
- Job title
- Company
- Postal address
- Phone number
- Email

This information may be collected when speaking with a Client Services Officer directly, when completing an enquiry form on the Cliftons website (www.cliftons.com), when completing booking details or account application forms, when completing feedback forms, credit card authorities or sales and purchase agreements.

Event & booking details are also kept on record.

- When collecting Personal Information, Cliftons will take reasonable steps to inform the individual of the following:
- The identification of Cliftons and its contact details;
- How the individual may obtain access to his or her Personal Information;
- Purposes for which the Personal Information is collected;
- To whom the Personal Information will be disclosed;
- Consequences (if any) if the individual does not provide all of their Personal Information requested.

Australian Privacy Principle 2 – Anonymity and pseudonymity

The provision of Personal Information is voluntary, and as such potential and current clients may choose to remain anonymous or use a pseudonym.

Cliftons will provide individuals with the option of not identifying themselves when it is lawful and practicable to do so. For example, gaining background information about Cliftons as an organisation and while exploring the public features of the Cliftons website (www.cliftons.com) without making an identity known to us.

Cliftons may not be able to provide appropriate products or services a Cliftons customer requests without the required and correct personal information.

Australian Privacy Principle 3 – Collection of solicited personal information

Cliftons information collection principles

- Only necessary information to provide a service, function or activity will be collected
- The collection of Personal Information will be conducted in a lawful and fair manner which is open and not misleading, and not unreasonably intrusive
- If it is reasonable and practicable to do so, collect Personal Information about an individual only from that individual
- If Personal Information is collected about an individual from someone else, take reasonable steps to ensure that the individual is or has been made aware of the matters listed in 1 above
- Cliftons does not actively collect Personal Information which is "sensitive information" (as defined in the Privacy Act 1988) but may collect sensitive information by consent if it is volunteered

Sensitive information

Cliftons collects minimal data classified as sensitive information. Sensitive information as relating to health must be collected with the consent of the individual unless it is required by law or unless it is necessary to prevent or lessen a serious and imminent threat to the life or health of that individual.

All sensitive information is collected and stored in compliance with other Personal Information as it relates to the Australian Privacy Principles.

Australian Privacy Principle 4 – Dealing with unsolicited information

If Cliftons receives personal information and Cliftons did not solicit the information, Cliftons will (within a reasonable period after receiving the information) determine whether or not the information could have been collected as outlined under Australian Privacy Principle 3.

Where it is determined that the information gathered could have been obtained through normal solicited means, than the information will be managed as per Australian Privacy Principle 3.

Where Cliftons determines that it could not have collected the personal information (and the information is not contained in a Commonwealth record) Cliftons will, as soon as practicable but only if it is lawful and reasonable to do so, destroy the information or ensure that the information is de-identified.

Australian Privacy Principle 5 – Notification of the collection of personal information

At or before the time or, if that is not practicable, as soon as practicable after, Cliftons collects personal information about an individual, Cliftons will take such steps (if any) as are reasonable in the circumstances to inform the individual of the following:

- The identification of Cliftons and its contact details
 - If Cliftons collects or has collected the personal information from someone other than the individual and the circumstances of that collection
 - If the collection of the personal information is required or authorised by or under an Australian law or a court/tribunal order – the fact that the collection is so required or authorised (including the name of the Australian law, or details of the court/ tribunal order, that requires or authorises the collection)
 - Purposes for which the Personal Information is collected
 - Consequences (if any) if the individual does not provide all of their Personal Information requested
 - To whom any Personal Information will be disclosed
 - Our Policy can be accessed at www.cliftons.com or by phoning our Privacy Officer on (02) 9250 0995.
 - Where required for customer service and service delivery at locations outside Australia, your information may be shared with international Cliftons offices and venues.
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Australian Privacy Principle 6 – Use or disclosure of personal information

The following guidelines apply for use and disclosure of information:

- The 'primary' purpose for collection of data is always made clear
- Consent for secondary purposes may be obtained at the same time of gathering information for the primary purpose or by future call / contact
- Personal Information may be used for secondary purposes, which include direct marketing, follow-up, relationship development and promotion of Cliftons and our services.
- If the information is used for secondary purposes, both of the following apply:
 - The secondary purpose relates to the primary purpose of collection, and if the Personal Information is sensitive information, directly related to the primary purpose of collection
 - The individual would reasonably expect the organisation to use or disclose the information for the secondary purpose; or

- The individual has consented to the use or disclosure; or
 - If the information is not sensitive information and the use of the information is for the secondary purpose of direct marketing to non-customers:
 - It is impracticable for Cliftons to seek the individual's consent before that particular use
 - The individual has not made a request to the organisation not to receive direct marketing communications; and
 - Cliftons procedures and guidelines on direct marketing are complied with
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Australian Privacy Principle 7 – Direct marketing

As outlined under Privacy Principle 6, Cliftons may use the personal information it gathers to direct market. This secondary use of information is made clear to each individual, the individual would reasonably expect this contact and unsubscribe opportunities are simple should they wish to opt out of this service at no charge.

Australian Privacy Principle 8 – Cross-border disclosure of personal information

Cliftons will only transfer Personal Information about an individual to someone (other than the organisation or the individual) who is in a foreign country if:

- The organisation reasonably believes that the recipient of the information is subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the information that are substantially similar to the National Privacy Principles; or
- The individual consents to the transfer; or
- The transfer is necessary for the performance of a contract between the individual and the organisation, or for the implementation of pre-contractual measures taken in response to the individual's request; or
- The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the individual between the organisation and a third party; or
- All of the following apply:
 - The transfer is for the benefit of the individual
 - It is impracticable to obtain the consent of the individual to that transfer
 - If it were practicable to obtain such consent, the individual would be likely to give it
- The organisation has taken reasonable steps to ensure that the information, which is transferred, will not be held, used or disclosed by the recipient of the information inconsistently with the Australian Privacy Principles.

Australian Privacy Principle 9 – Adoption, use or disclosure of government related identifiers

Cliftons does not adopt or disclose any government related identifier of an individual as its own identifier of the individual unless the adoption of the government related identifier is required or authorised by or under an Australian law or a court/tribunal order; if:

- The identifier is prescribed by the regulations; and
 - The organisation is prescribed by the regulations, or is included in a class of organisations prescribed by the regulations; and
 - The adoption, use or disclosure occurs in the circumstances prescribed by the regulations.
 - In this Privacy Policy, Identifier includes a number assigned by an organisation to an individual to identify uniquely the individual for the purposes of the organisation's operations. However, an individual's name or ABN (as defined under Section 30 of the Australian Business Number Act 1999) is not an identifier.
 - Cliftons does not employ as an identifier for an individual any identifier that has been assigned by:
 - An agency; or an agent of agency.
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Australian Privacy Principle 10 – Quality of personal information

Cliftons will take all reasonable measures to ensure that the personal information they collect, use or disclose is, for the purpose described and the use or disclosure, is accurate, up to date and complete.

Procedures undertaken to ensure data quality include:

- Online customer profile update forms
 - Verification of Personal Information during contact
 - Compliance Program procedures
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Australian Privacy Principle 11 – Security of personal information

Cliftons has implemented the following security safeguard and procedures to ensure individuals' Personal Information are restricted from:

- Misuse
- Loss; or

- Unauthorised access, modification or disclosure

All data is stored in either secure hard copy format in locked cabinets with limited and registered access, or electronically where access is restricted and password protected. Security safeguard presently in place includes:

- Network access classes defined on a per user basis, with access level based on a 'need to know' basis
- General ledger access specified
- Ability to lock-out all users
- Physical database server is kept in locked, temperature controlled room
- Confidential documents are stored nightly in a lockable physical security area
- Data is archived securely
- Unique individual passwords for staff and clients

All records are kept securely and confidential information safeguarded. Records are kept to avoid fire, flood, termites or any other pests and are available when / if required by statutory authorities. A backup of all records must be kept.

Australian Privacy Principle 12 – Access to personal information

Cliftons understands that open communication with individuals in relation to access to Personal Information is necessary to gain trust and to build a relationship.

In relation to the Cliftons Privacy Policy, giving access means that on request, and if none of the APP exceptions apply, Cliftons must give an individual access to information it holds about the individual that falls within the definition of Personal Information. This includes information it has collected from third parties and information it has received unsolicited and added to its records.

According to Cliftons Privacy Policy when individuals request information:

- They are not required to provide a reason
- All official requests for information must be in writing
- An identity check is undertaken
- Information is checked to ensure no information should be withheld (according to the Privacy Act 1988). Where access to certain details is to be withheld, reasons for this decision will need to be provided to the individual.

Once the Personal Information is prepared and cleared for access, the information can be provided in the form most appropriate to the situation. This will take into account the intention expressed by the individual in his or her original request.

The total time for processing a request for access to information should take no longer than 28 days from the time a request is received.

Australian Privacy Principle 13 – Correction of personal information (Review and access)

Where Cliftons holds personal information about an individual and finds that, having regard to a purpose for which the information is held, the information is inaccurate, out of date, incomplete, irrelevant or misleading; Cliftons will take reasonable steps to correct that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up to date, complete, relevant and not misleading.

Complaints

Clients and their attendees and participants are encouraged to provide feedback if they believe their information has been misused or if they believe this policy has not been adhered to in practice by Cliftons.

The below process for complaints is taken from the Cliftons Grievance Resolution Policy:

Stage 1 Informal Notification: Where the aggrieved party raises a complaint or grievance directly with a Cliftons employee or consultant, it is expected that the employee or consultant make every effort (within their role jurisdiction) to resolve the issue directly and in a timely manner.

Stage 2 Written Notification and Internal Review: The aggrieved party is encouraged to put their grievance in writing. Upon receipt of this correspondence, the Privacy Officer will welcome the opportunity to respond to the matter and commence the resolution process by seeking an immediate response from the appropriate Manager.

Stage 3 Escalated Review: If the aggrieved party is dissatisfied with the proposed outcome, they have the right, in the first instance, to take their grievance to the Managing Director, who will repeat this stage at an escalated level.

Stage 4 External Dispute Resolution: If the matter remains unresolved after being addressed by both the appropriate Manager and the Managing Director, the complainant may request that the matter be dealt with through an external dispute resolution process. This stage of the process will be dealt with in a reasonable period of time depending on all parties, normally 28 days. There may be nominal cost to the applicant for this service depending on their choice of third party.

Upon resolution, appropriate steps need to be taken to implement the decided and agreed outcome. Depending on the type of action to be taken, the outcome will be completed to the complainants and Cliftons satisfaction within five (5) working days of the resolution being determined or as agreed to between both parties.

Queries

Any Privacy-related queries should be addressed to:

The Privacy Officer

P: +61 2 9250 0995

E: privacy@cliftons.com

W: www.cliftons.com