

Ellby Group

P16 - Privacy Policy

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1. Policy Statement

This document details Ellby Group members (FileBound Solutions, UpFlow and UpSol) policy for Privacy. Procedures and guidelines are aimed specifically at protecting the privacy of all stakeholder data within the Ellby Group.

2. Review and Update of the Policy Statement

The Policy Statement and associated company Policies are reviewed at least annually by Ellby Group's Leadership Team to ensure:

- o The business meets its compliance obligations to its client's data.
- o It maintains its relevance to the business' current and planned operations.

The Ellby Group's Leadership Group will undertake the technical review of this policy statement and associated company policies.

Any changes to this policy will be updated on our company websites.

3. Purpose

This document details the procedures used at Ellby Group to ensure the protection of Privacy and data in-line with relevant legislation.

4. Scope

This document details guidelines and procedures for members of staff and any third parties that have a relationship with the Ellby Group.

5. Policy

Ellby Group Pty Ltd and its related entities is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

We have adopted the following Privacy Principles (PPs) contained in the Australian Privacy Act 1988 (Cth) and the New Zealand Privacy Act 1993 (the Privacy Act). The PPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at www.aaic.gov.au.

A copy of the New Zealand Privacy Principles may be obtained from the website of The Office of the Privacy Commissioner at www.privacy.org.nz.

5.1 What is Personal Information and why do we collect it?

Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect include: names, addresses, email addresses, phone and facsimile numbers.

This Personal Information is obtained in many ways including correspondence, by telephone, by email, via our website, from your website, from media and publications, from other publicly available sources, from cookies and from third parties. We don't guarantee website links or policy of authorised third parties.

We collect your Personal Information for the primary purpose of providing our services to you, providing information to our clients and marketing. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

5.2 Sensitive Information

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law.

5.3 Third Parties

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

5.4 Disclosure of Personal Information

Your Personal Information may be disclosed in a number of circumstances including the following:

- Third parties where you consent to the use or disclosure; and
- Where required or authorised by law.

5.6 Security of Personal Information

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which may be kept by us for up to 7 years.

5.6 Data Breach Notification (DBN)

A DBN will be sent to you and the relevant government authorities specified by law if we believe that there has been unauthorised access or disclosure of your personal information, or that your information has been lost in a way that is likely to give rise to unauthorised access or disclosure; and there is a likely risk of serious harm as a result of the unauthorised access or disclosure.

In any Notification we will let you know the specifics of the Breach and we will also provide you with recommended actions that you should take in relation to the event.

5.7 Access to your Personal Information

You may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing.

Ellby Group Pty Ltd will not charge any fee for your access request but may charge an administrative fee for providing a copy of your Personal Information.

In order to protect your Personal Information we may require identification from you before releasing the requested information.

5.8 Maintaining the Quality of your Personal Information

It is important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

5.9 Policy Updates

This Policy may change from time to time and is available on our website.

6 Privacy Policy Complaints and Enquiries

If you have any queries or complaints about our Privacy Policy please contact us at:

Ellby Group Pty Ltd

Privacy Officer

PO Box 52,

Kedron QLD 4031