

## PRIVACY POLICY

PIM Group Australia PTY LTD (ABN 96 629 254 815 0) (**PIM** or **We/we** or **Our/our** or **Us/us**) is committed to respecting the privacy of your personal information.

This Privacy Policy explains our policy for dealing with personal information that we collect through the following channels (here and after, the **Collection Channels**):

- our online properties (here and after, each a “**Website**”), including:
  - our websites, including, but not limited to [www.pimgroup.com.au](http://www.pimgroup.com.au);
  - any related PIM website, social media page, internal website, intranet and any PIM mobile or tablet applications;
- personal information provided to us by our clients and customers and personal information collected by us on behalf of our clients and customers as a result of the provision of professional services to our clients and customers; and
- any other means through which an individual provides personal information to PIM, including either physically or electronically.

You may contact us with any queries you may have in respect of this Privacy Policy or your personal information by contacting PIM's privacy officer via email: [info@pimgroup.com.au](mailto:info@pimgroup.com.au) or telephone:02 9439 1100.

### **Personal information is important to PIM**

1. PIM is committed to safeguarding personal privacy. It recognises that you have a right to control how your personal information is collected and used. Providing personal information is an act of trust and it is taken seriously. Unless given consent to do otherwise, PIM will only collect and use personal information as set out below.
2. Throughout this Privacy Policy, we refer to your 'personal information', which means information or an opinion about an identified individual, or an individual who is reasonably identifiable whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not. Your full name, gender, date of birth, home address, home telephone number, mobile telephone number, email address and workplace contact details are examples of information which may constitute personal information. Personal information may also include information we may collect about your individual preferences.
3. PIM has developed and implemented its Privacy Policy with respect to personal information to reflect world best practice on privacy policies. These principles meet and exceed the requirements of the *Privacy Act 1988* (Cth) (as amended) and the 13 Australian Privacy Principles.
4. In order to keep up with changing legislation and best practice, we may revise this Privacy Policy at any time without notice. We will post any changes to this Privacy Policy on our Websites, so we encourage you to check this Privacy Policy from time to time.
5. In addition to the provisions of this Privacy Policy, there may also be specific and additional privacy and consent provisions that apply to certain Collection Channels. Because those specific and additional provisions also relate to your privacy protection, we recommend that you review them wherever they appear. In the event of any inconsistency between the provisions of this Privacy Policy and those other specific and additional provisions, the specific and additional provisions will prevail.

### **Anonymity and pseudonymity**

6. Where practicable, we will allow you to deal with us on an anonymous or pseudonymous basis. If this is practicable, our Collection Channels will seek information in this way. However, where it is not practicable for the purposes for which information is collected, we will seek the information identified below

**Kinds of Personal Information that PIM Collects and Holds**

7. Personal information that may be requested or collected by us includes:
  - a. contact information such as your full name, date of birth, age, telephone number, mobile telephone number, current and valid email address, residential address and postcode;
  - b. more detailed contact preferences;
  - c. information regarding your personal and professional interests and your networks;
  - d. information about your employment including your employer and job title and the nature of your role;
  - e. information about your employment history and future plans, and documents relating to your employment;
  - f. information about your education and qualifications;
  - g. complaint details;
  - h. information about your experiences with our products or services or third party products or services, including those listed on a Website. This information is requested in order to tailor our subsequent communications to you and continuously improve our products and services;
  - i. the contact details of third parties. If you are asked to provide details about other people, please ensure that these individuals are happy for their details to be given to PIM and used for the purposes set out in this policy (which may include using their details for marketing purposes);
  - j. any other personal information which you directly provide to PIM. Where you provide us with such unsolicited personal information, we will retain this information where it falls within our primary purposes for collection of personal information (as stated in this Privacy Policy); and
  - k. any other personal information requested or required by a Collection Channel.
8. When you use a Website, we may also collect personal information about you in the following general categories:
  - a. usage and preference information: we collect information about how you interact with a Website, including the pages you visit, your preferences and settings that you choose. We may do this through the use of cookies and other similar technologies that uniquely identify you;
  - b. device information: we may collect information about your mobile device such as the hardware model, operating system, preferred language, unique device identifier and mobile network; and
  - c. other information: we may also collect and log information such as your IP address, access dates and times, browser type and pages visited when you interact with a Website.

**Sensitive Information**

9. We will only collect sensitive information with your consent. Where you provide us with any sensitive information (including, but not limited to, information about your racial or ethnic origin, religious affiliation, political opinions, sexual orientation and/or medical history) we will only use this information for the purposes stated on the Collection Channel.

**How PIM Collects and Holds Personal Information**

10. PIM will only collect or monitor any personal information about you with your consent including as provided in this Privacy Policy or if it is otherwise lawful to do so. The only personal information collected by us is what has been provided to us in accordance with

this Privacy Policy or has been provided to us lawfully by third parties, including our clients and customers.

### **Active Information Collection**

11. Personal information may be collected (and combined) via our Collection Channels if you:
  - a. have previously provided us with personal information prior to this Privacy Policy coming into effect, either directly from you personally or via a third party;
  - b. sign-up and/or register to become a member of any Collection Channel, or provide your details to us via any Collection Channel;
  - c. subscribe to any newsletters, updates, alerts or news and media releases, or request launch or event information or information about our products or services or other information services as well as third party products or services;
  - d. complete and submit any forms or surveys to us, either physically or electronically;
  - e. conspicuously publish or provide on request your personal information to PIM;
  - f. contact us directly in person or via any medium including mail, telephone, social media and commercial electronic messages (SMS (Short Message Service), MMS (Multimedia Message Service), IM (Instant Messaging) and email) including via the contact details listed on a Website;
  - g. participate in any competitions, offers, promotions or marketing activities;
  - h. interact with a Website for a specific purpose; or
  - i. interact with or browse a Website generally.
12. Personal information is requested in order to facilitate or provide you with certain content, products or services, and information about such content, products or services (including the uploading, access to, and receipt of content on a Website), marketing materials, newsletters, electronic newsletters (e-newsletters), news and media releases / launch information, and also to advise you of other PIM or third party products, services, offers, competitions or events which may be of interest. No one is obligated to provide personal information. However, failure to do so may result in PIM being unable to facilitate or provide you with certain content, products or services, products or services information, upcoming promotion, competition, offer or event information or accept competition entries (where applicable).
13. We may also obtain your personal information from legitimate third party sources including list brokers, referral agents and other data providers or organisations that share data in circumstances where it is lawful and/or you have given permission for them to do so.

### **Children**

14. Personal information will not be collected by any person who is known by PIM to be under the age of eighteen (18) without the consent of a parent or legal guardian. Persons under age eighteen (18) may only use our Websites with the involvement and consent of a parent or legal guardian.

### **Passive Information Collection**

15. As with many commercial websites, PIM may also collect information which tells us about visitors to our Websites. For example, we may collect information about the date, time and duration of visits and which pages of a Website are most commonly accessed. This information is generally not linked to the identity of visitors, except where a Website is accessed via links in an email we have sent or where we are able to uniquely identify the device or user accessing a Website. By accessing a Website via links in an email we have sent and/or by accessing a Website generally, you consent to the collection of such information where it is personal information.
16. As you navigate through our Websites, certain information can be passively collected

(that is, gathered without you actively providing the information) using various technologies, such as Unique Device Identifiers (**UDI**), cookies, Internet tags or web beacons, and navigational data collection (log files, server logs, clickstream). In certain circumstances, this information may be considered anonymous information or personal information under the *Privacy Act 1988* (Cth). This is dependent on the device used and the method by which an individual connects to the Internet. Your Internet browser automatically transmits to the Website you are browsing some of this anonymous information or personal information, such as the URL of the website you just came from, the Internet Protocol (**IP**) address, the UDI (if applicable) and the browser version your device is currently using. Our Websites may also collect anonymous information or personal information from your device through cookies and Internet tags or web beacons. You may set your browser to notify you when a cookie is sent or to refuse cookies altogether, but certain features of a Website might not work without cookies and this may limit the services provided by a Website. Cookies and other technical methods may involve the transmission of information either directly to us or to another party authorised by us to collect information on our behalf.

17. Our Websites may use and combine such passively collected anonymous information or personal information from various third party sources, including as described in paragraph 15, to provide better service to Website visitors and users, customise a Website based on your preferences, compile and analyse statistics and trends, and otherwise administer and improve a Website for your use. We may combine your visitor session information or other information collected through tracking technologies with personally identifiable information from time to time in order to understand and measure your online experiences and to determine what products, promotions and services are likely to be of interest to you. By accessing a Website, you consent to information about you being collected, compiled and used in this way.
18. For more information about cookies and how you can opt out, you can visit <http://www.youronlinechoices.com.au/>.

### **Platform permissions**

19. Mobile platforms such as iOS and Android generally define certain types of information or data that applications cannot access without your consent. Each platform has its own permissions system for obtaining your consent. For example, the iOS platform generally alerts you the first time an app wants permission to access certain types of data, such as location services, and will let you choose whether or not to consent to that request. Android devices will generally notify you of the permissions that an app seeks before you first use the app, and your use of the app constitutes your consent. You can generally manage your platform level permissions via the Settings section on your device. For more information, please contact our Privacy Officer at the details set out in this policy.

### **Purposes for which PIM collects, holds, uses and discloses personal information**

20. Personal information collected will be collected, used and/or disclosed for the following primary purposes:
  - a. For the purposes for which it was collected (as advised in this Privacy Policy).
  - b. For the purposes stated in a privacy collection statement on a particular Collection Channel.
  - c. To consider employment applications.
  - d. To maintain the functionality of a Website, including the provision of information to you relating to the content available on the Website and e-commerce transactions conducted via the Website.
  - e. To send you any technical, administrative or legal notices important to our Websites and services generally.
  - f. To provide you with information about your transactions (including uploading, access to, and receipt of content on a Website, and purchase transactions undertaken on a Website), content, services and products.

- g. To provide direct marketing materials, events, special offers, competitions and promotions in person and via any medium including mail, telephone and commercial electronic messages (SMS (Short Message Service), MMS (Multimedia Messaging Service), IM (Instant Messaging), email) or any other form of electronic, emerging, digital or conventional communications channel.
- h. To maintain our relationship with you.
- i. To render services related to PIM.
- j. To undertake recruitment for PIM.
- k. To provide you with newsletters via mail and electronic newsletters (e-newsletters) via commercial electronic messages.
- l. To respond to client and customer enquiries.
- m. To obtain opinions or comments about products and/or services and to conduct other research and development.
- n. To record statistical data for marketing analysis and to conduct market research.
- o. To share personal information with PIM group companies, our promotional partners and other trusted third parties in the manner described below.
- p. To collect, hold, use and disclose personal information as stated above, for the purpose of providing professional services to our clients and customers.

For the purposes described above, personal information may be shared with PIM group companies, PIM promotional partners, PIM clients and customers and other trusted third parties (and their directors, servants and agents) either in Australia or overseas including but not limited to France, the United Kingdom and New Zealand. Failure to provide personal information may result in PIM being unable to consider employment applications, provide you with certain content, information, upcoming promotion, event or product information and/or accept promotion entries (where applicable).

- 21. In order to operate a Website or deliver a service (including, for example, processing of credit card payments), personal information may also be shared with PIM group companies, selected service providers and/or other trusted third parties either in Australia or overseas including but not limited to France, the United Kingdom and New Zealand. PIM group companies, selected service providers and/or other trusted third parties may be engaged by PIM to perform a variety of functions, such as data storage, processing credit card payments, fulfilling orders, conducting market research, assisting with promotions and surveys and providing technical services for our Websites. These companies may have access to personal information if needed to perform such functions. Your credit card details are only used to facilitate your booking and/or purchase and are not permanently stored. They are not used for any other purpose.
- 22. PIM recognises the trust with which you provide personal information, and except as stated in this Privacy Policy, such information will not be used or disclosed for any other purposes without consent. However, PIM reserves the right to use or disclose any information, including personal information, as needed to satisfy any law, regulation or legal request, to protect the rights or property of PIM, any client of PIM, or any member of the public, to protect the integrity of a Website, to fulfil your requests, or to cooperate in any law enforcement investigation or an investigation on a matter of public safety.

#### **Contact by PIM**

- 23. PIM (and its directors, servants and agents), PIM promotional partners or trusted third parties (and other selected service providers and other non-PIM companies or professionals) either in Australia or overseas, may contact you via telephone, SMS (Short Message Service), MMS (Multimedia Messaging Service), IM (Instant Messaging), email, post or any other form of electronic, emerging, digital or conventional communications channel using the information provided in order to contact you in respect of the primary purposes for collection of personal information as stated above.
- 24. PIM does not send advertising or marketing information without obtaining prior consent, for example the consent contained within this Privacy Policy, or unless otherwise lawful

to do so. If you receive communications from PIM which you do not wish to receive, you may remove your name from the database either by utilising the functional unsubscribe facility (if the communication is via commercial electronic message) or by contacting PIM via email: [info@pimgroup.com.au](mailto:info@pimgroup.com.au) or telephone: 02 9439 1100 Please allow 30 days for this request to be processed.

25. Despite removing your name from the database from receiving future advertising and marketing information, PIM may send you non-commercial "Administrative Emails". Administrative Emails relate to a PIM user account and may include administrative and transaction confirmations, requests and inquiries or information about a particular PIM user account. If you do not wish to receive such communications from PIM, you may remove your name from the database by utilising the functional unsubscribe facility.

#### **Ability of others to view information**

26. PIM may provide areas on a Website where you can upload user-generated content, post or provide information about yourself, communicate with other users, provide reviews for content, products and/or services or interact with or vote on particular content. This information may be shared with others and may be publicly posted on our Websites, including without limitation, other social media platforms and other public forums in which you choose to participate. This information may become publicly available and may be read, collected and used by others outside of our Websites. PIM is not responsible for the conduct of others who may read, collect and use this information.

#### **Your right of access**

27. You have the right to access and review your personal information that may be recorded on PIM database. Information may be reviewed by contacting PIM's privacy officer via email: [info@pimgroup.com.au](mailto:info@pimgroup.com.au) or telephone: 02 9439 1100]. Please allow 30 days for this request to be processed.

#### **Changing and deleting the information we have about you**

28. Information contained on the database may be amended, or your preferences for contact from us changed, by contacting PIM's privacy officer via email: [info@pimgroup.com.au](mailto:info@pimgroup.com.au) or telephone: 02 9439 1100. Please allow 30 days for this request to be processed.
29. In the same way, a request may be made to delete personal information, and all reasonable steps to delete the information will be made, except where it is required for legal reasons. Deletion of information may result in PIM being unable to facilitate or provide you with information about certain transactions (including the uploading, access to, and receipt of content on a Website, and purchase transactions undertaken on a Website), other content, services or product information, upcoming promotion, competition or event information, and/or provide certain content, goods or services.
30. We are not responsible for removing your personal information from the lists of any third party who has previously been provided your information in accordance with this policy.

#### **Storage and security of personal information**

31. PIM will endeavour to take all reasonable steps to keep secure any personal information recorded (including your credit card details), and to keep this information accurate, up to date, complete and relevant. The information is stored on secure servers that are protected in controlled facilities. This service may be performed on our behalf and data may be hosted by our selected data storage providers. When you enter sensitive information (such as credit card numbers) on our Websites, we encrypt that information using Secure Socket Layer technology (SSL). For further information about credit card payments, see our Security Policy below.

#### **Disclosure of personal information to overseas recipients**

32. In some cases, PIM may disclose your personal information to overseas recipients in countries including, but not limited to, France, the United Kingdom and New Zealand. PIM employees, data processors and other trusted third parties including industry associations are obliged to respect the confidentiality of any personal information held by PIM. However, security of communications over the Internet cannot be guaranteed, and

therefore absolute assurance that information will be secure at all times cannot be given. PIM will not be held responsible for events arising from unauthorised access to personal information.

### **PIM and links to other websites**

33. Our Websites may, from time to time, contain links to the websites of other organisations which may be of interest to you. Their inclusion cannot be taken to imply any endorsement or validation by us of the content of the third party website. Linked websites are responsible for their own privacy practices and you should check those websites for their respective privacy statements. PIM is not responsible, nor does it accept any liability, for the conduct of companies linked to our Websites.
34. We may use third party advertisements on our Websites. All third party advertising, if paid for, is paid for by the relevant third party advertisers and are not recommendations or endorsements by PIM or any of its affiliates. PIM is not responsible for the content (including representations) of any third party advertisement on a Website. Cookies may be associated with these advertisements to enable the advertiser to track the number of anonymous users responding to the campaign. We do not have access to or control of cookies placed by third parties.

### **Related PIM Websites**

35. All Websites operated by PIM will adhere to this Privacy Policy. The policies on the Websites of some clients of PIM group may vary, however, because of local customs, practices or laws.

### **Sale of the Company**

36. If PIM merges with, or is acquired by, another company or organisation, or sells all or a portion of its assets, your personal information may be disclosed to our advisers and any prospective purchaser's adviser, and may be among the assets transferred. However, personal information will always remain subject to this Privacy Policy.

### **Problems or queries**

37. If you have any questions about our Privacy Policy, or any problems or complaints about how we have collected, used, stored, handled and/or disclosed your personal information, please contact our privacy officer via one of the following channels:

Address: 77 Alexander Street, Crows Nest, 2065

Telephone: 02 9439 1100

Email: [info@pimgroup.com.au](mailto:info@pimgroup.com.au)

Please allow 30 days for this request to be processed. If you do not receive a satisfactory response from PIM to your query, problem or complaint within 30 days, you may refer your query, problem or complaint to the Office of the Australian Information Commissioner via the contact details listed at <http://www.oaic.gov.au/about-us/contact-us-page>.