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OUR PRIVACY POLICY

1. Our Approach

- 1.1 We are committed to protecting personal information we collect in the course of our business
- 1.2 We are bound by the *Privacy Act 1988* (Cth) (**Privacy Act**), including the Australian Privacy Principles (**APPs**), and relevant registered codes, although acts done or practices engaged in by us which are directly related to:-
 - (a) a current or former employment relationship between a person and us; and
 - (b) an employee record held by us,are exempt from the Privacy Act, including the APPs.

2. Collection

Types of information

- 2.1 We may collect and hold personal information about people, that is, information that can identify the person and is relevant to the services the person is seeking. This information typically includes their name, gender, address, phone number, facsimile number, email address, bank account details, place and type of business or other information relevant to providing the services the person, or someone they know is seeking.
- 2.2 If a person requests services from us, we may also collect and hold various information related to them and their financial position, including credit information or credit eligibility information about them.

Purpose of collection

- 2.3 The personal information that we collect and hold about a person depends on the person's interaction with us. Generally, we collect, use and hold personal information for the purposes of:-
 - (a) providing legal services to a person or someone else they know;
 - (b) providing information about other services that we offer that may be of interest;
 - (c) providing information relevant to the type of business or other area of expertise or interest of the recipient;
 - (d) facilitating our internal business operations, including the fulfilment of any legal requirements
 - (e) analysing our services and customer needs with a view to developing new and improved services; and
 - (f) contacting someone to provide a testimonial for us.

Method of collection

- 2.4 Personal information is generally collected by us directly from the person, through the use of any of our standard forms, over the internet, via email, or through a telephone conversation with the person. We may also collect personal information about a person from third parties acting on their behalf (e.g. dealers, brokers or financial advisors).
- 2.5 There may, however, be some instances where personal information is collected indirectly because it is unreasonable or impractical to collect personal information directly. We usually notify the person about these instances in advance or, where that is not practicable after the information has been collected.

Internet Users

- 2.6 If a person accesses our website, we may collect additional personal information in the form of the person's IP address or domain name. Our website may contain links to other websites. We are not responsible for the privacy practices of linked websites and any linked websites are not subject to our privacy policies and procedures.

Failure to provide information

- 2.7 If the personal information given to us is incomplete or inaccurate, we may be unable to give the person, or the person they know, the services they, or the other person, is seeking.

3. Use and Disclosure

- 3.1 Generally, we only use or disclose personal information about a person for the purposes for which it was collected (as set out above). However, we may disclose personal information about the person to:-
- (a) third party service providers who assist us in operating our business (including credit reporting bodies and technology service providers), and these service providers may not be required to comply with our privacy policy;
 - (b) a purchaser of the assets and operations of our business, providing those assets and operations are purchased as a going concern; and
 - (c) our related entities and other organisations with whom we have affiliations so that those organisations may give the person information about services and various promotions.
- 3.2 In some circumstances, the law may permit or require us to use or disclose personal information for other purposes (e.g. where a person would reasonable expect us to and the purpose is related to the purpose of collection).

4. Security

- 4.1 We store personal information in different ways, including in paper and electronic form.
- 4.2 The security of personal information is important to us.
- 4.3 We take all reasonable measures to ensure that personal information is stored safely to protect it from misuse, loss, unauthorised access, modification or disclosure, including electronic and physical security measures.

5. Access and Correction

- 5.1 People may access personal information we hold about them by making a written request. We will respond to the request within a reasonable time¹. We may charge the person a reasonable fee for processing that request (but not for making the request).
- 5.2 We may decline a request for access to personal information in circumstances prescribed by the Privacy Act, and if we do, we Will give the person a written notice that sets out the reasons for the refusal (unless it would be unreasonable to provide those reasons).
- 5.3 If, upon receiving access to personal information, or at any other time, the person believes the personal information we hold about them is inaccurate, incomplete or out of date, they should notify us immediately. We will take reasonable steps to correct the information so that it is accurate, complete and up to date.
- 5.4 If we refuse to correct a person's personal information, we Will give them a written notice that sets out the reasons for our refusal (unless it would be unreasonable to provide those reasons).

6. Updates

We may update this document from time to time.

7. Complaints and feedback

- 7.1 If a person wishes to make a complaint about a breach of the Privacy Act, APPS or a privacy code that applies to us, they may contact us as set out below and we will take reasonable steps to investigate the complaint and respond to them. If they are not happy with our response, the person may complain directly to the Australian Information Commissioner.
- 7.2 If a person has any queries or concerns about our privacy requirements or how we manage personal information, they can contact our Privacy Officer at:-

Street Address: 1065 Gold Coast Highway, Palm Beach Qld 4221

Email Address: enquiries@ingwersen.com.au

Telephone: 07 5589 2600

Facsimile: 07 5534 2838

- 7.3 For more information about privacy in general, the Australian Information Commissioner's website is at www.oaic.gov.au

Liability limited by a scheme approved under Professional Standards Legislation.

¹

APP guidelines suggest that a reasonable period should not exceed 30 calendar days.