

Privacy Policy

Last Updated: 19 October 2018

About this Privacy Policy

Dobbyn and Carafa Pty. Ltd. (ABN 57 142 891 835) and its related entities including Dobbyn and Carafa Finance Pty. Ltd. (ABN 41 611 031 906) and Dobbyn and Carafa Insurance Pty. Ltd. (ABN 72 625 918 701) (referred to as 'D+C', 'we', 'us' or 'our') are committed to protecting the privacy of personal information in accordance with the Australian Privacy Principles (**APPs**) contained in the Privacy Act 1988 (Cth) (**Privacy Act**).

This Privacy Policy sets out how we collect, hold and use personal information in accordance with the Privacy Act. It does not cover categories of information that are exempted under the Privacy Act.

You accept this Privacy Policy and expressly consent to our collection, use and disclosure of your personal information as described in this Privacy Policy by using our website (www.dobbyncarafa.com.au), our mobile applications, our products and services or by other communications with us.

The type of Personal Information we Collect and Hold

We may collect and hold personal information about you such as your name, gender, date of birth, contact details (including your address, phone numbers and emails, whether personal or for work), financial information, payment details, bank account details, tax file number, products and services information and preferences.

As part of our recruitment process, we may also collect and hold personal information including, but not limited to, professional memberships, criminal records, visa and residency status information and professional references.

Use and Disclosure

We use the personal information we collect from you for our business functions and activities, which may include:

- Providing products and services to you;
- Receiving products and services from you;
- Providing you with information on our services and products, economic and industry developments, seminars and events;
- Recruitment and personnel matters;
- Performing internal administration functions;
- Complying with regulatory or other legal requirements; and
- For any other use required or permitted by law or any other purpose communicated to you at the time that the personal information was collected or for which you provided your consent.

We may use your personal information for a secondary purpose if that secondary purpose is related to the purposes listed above, if we have your consent or if otherwise provided for under the Privacy Act.

Generally, we will only collect and use your personal information in accordance with this Privacy Policy. In the event that we collect or use personal information in ways other than as stated in this Privacy Policy, we will ensure that we do so in accordance with the Privacy Act.

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How we Collect Personal Information

D+C collects personal information from you in a number of ways. We may collect personal information from you when you visit D+C's websites, social media pages, request information about our services and products, or otherwise contact us by email, telephone, facsimile, post or in person. We may also collect personal information about you from third parties, including clients, contractors, service providers, government agencies and public sources.

If you provide personal information about other individuals to us, you must ensure that you have informed those individuals that you are providing their personal information to us and obtained their consent. You must also refer them to this Privacy Policy.

Due to the nature of D+C's business it is generally impractical to use a pseudonym or remain anonymous when dealing with us. If you chose not to provide your personal information to us, we may not be able to provide you with the requested information or services.

Employee Records

Employee records are not generally subject to the Privacy Act. As such this Privacy Policy may not apply to the handling of employee related information. Please contact us directly for information about our employee information handling practices.

Security and Storage of Personal Information held by us

We will take reasonable steps to protect your personal information from misuse, interference and loss and from unauthorised access, modification or disclosure.

We aim to keep your personal information secure and up to date. We will comply with our obligations under the Privacy Act in relation to any personal information that we handle, including information which is held on our computer systems.

Personal information is held via hard and soft copy (electronically). We have a range of physical and electronic security measures to protect personal information including but are not limited to, card restricted access passes to offices, security systems, lockable storage, safeguards on hardware and software technology including firewalls, passwords, restriction of access and digital certificates.

Disclosure of Personal Information

D+C may disclose personal information to third parties, such as contractors, service providers and agents, to assist us with our activities and the provision of products and services to our clients.

The types of third parties to whom we may disclose your personal information include:

- Specialist consultants or other third parties contracted as part of an engagement;
- Any person acting on your behalf, such as your financial advisor, solicitor, settlement agent, administrator; and
- Government agencies, regulatory bodies or courts and tribunals.

We do not disclose personal information to third parties for the purposes of allowing them to send marketing material to you.

D+C has no intention to disclose personal information to overseas entities. However, in some circumstances the disclosure of your personal information may be required.

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It is possible that the overseas entities may be subject to foreign laws that do not provide the same level of protection of information as in Australia. We take reasonable steps to ensure that these overseas entities do not breach the APPs and that they are obliged to protect the privacy and security of your personal information and use it only for the purpose for which it is disclosed.

Notifiable Data Breaches Scheme

In the event of any loss, or unauthorised access or disclosure of your personal information that is likely to result in serious harm to you, we will investigate and notify you and the Office of the Australian Information Commissioner (OAIC) as soon as practicable and in accordance with the Privacy Act.

Marketing Purposes

D+C may use personal information to send promotional materials to inform you about the products and services we provide, or that other companies offer which we think may be of interest to you. You have the opportunity to elect not to receive further marketing material by:

- Using the 'Unsubscribe' opt-out link provided on soft copy direct marketing related material; or
- Informing us by one of the ways specified under the section 'Contact Us'.

We will not send you any electronic messages (SMS or emails) unless it is permitted by the Spam Act (e.g. we have your express or inferred consent). Any electronic message that we send will identify us as the sender and will include relevant contact details and an unsubscribe facility. If you do not wish to receive electronic messages from us on a particular number or phone calls from us on a particular number, please contact us.

Privacy on our Website

In order to use D+C's website and mobile device applications, you are not required to submit any personal information. The D+C website only collects personal information that is knowingly provided by its users via the 'Contact Us' form. D+C will contact the individual where necessary for consent to use personal information.

D+C logs certain data and statistics regarding users of the D+C website and may use third party analytics software to analyse traffic to our websites and mobile device applications, or to anonymously survey users of our sites and applications. This information includes IP addresses, browser types and access times. D+C may use cookies on some pages of its website. Cookies are small text files transferred to a user's computer hard drive for the purposes of storing information about a user's identity, browser type or website visiting patterns. You may not be able to access some parts of our website if you choose to disable the cookie acceptance in your browser.

Access to Personal Information

You are entitled to request access to your personal information. We will grant your request unless providing you with access would unreasonably impact upon the privacy of others or is not otherwise permitted under the Privacy Act.

A request for access must be in writing and can be made by contacting us by one of the ways specified under the section 'Contact us'.

Correction of Personal Information

We take reasonable steps to ensure that your personal information is accurate, complete and up-to-date. You may request correction of your personal information by contacting us by one of the ways specified under the section 'Contact Us'. All requests must be in writing.

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Complaints

If you believe that your privacy has not been respected or that we have not complied with this Privacy Policy or the Privacy Act, please contact us as set out below. All complaints are to be communicated in writing and please provide as much detail as possible so that we may resolve it in an efficient manner.

D+C will investigate and attempt to resolve any alleged breach of privacy internally. We expect our procedures will deal fairly and promptly with your complaint. However, if you are dissatisfied with our response, you may make a formal complaint to the Office of the Australian Information Commissioner (OAIC). The OAIC may be contacted at www.oaic.gov.au or by email at enquiries@oaic.gov.au.

Contact us

Should you have any queries about our Privacy Policy please contact us by any of the following:

- Completing the D+C 'Contact Us' form via our website
http://www.dobbyncarafa.com.au/contact_dobbyn_carafa/email_enquiry
- By phone:
(03) 9069 7700
- By email:
paul.pun@dobbyncarafa.com.au
- By post:
Dobbyn & Carafa
Level 9, 636 St Kilda Road
Melbourne VIC 3004