

DLA Partners Privacy Policy

DLA Partners (“DLA”) is committed to treating the personal information we collect in accordance with the Australian Privacy Principles in the *Privacy Act 1988 (Cth) (Privacy Act)*. This Privacy Policy sets out how DLA handles all personal information.

This Privacy Policy does not apply to personal information collected by DLA that is exempted under the *Privacy Act*, for example employee records.

DLA will modify this Privacy Policy if required to reflect its current privacy practices.

Personal Information – What we collect

The types of personal information we collect includes:

- names, job titles, contact and address details;
- information in identification documents (for example, passport, driver’s licence);
- tax file numbers and other government-issued identification numbers;
- date of birth and gender;
- bank account details, shareholdings and details of investments;
- details of superannuation and insurance arrangements;
- educational qualifications, employment history and salary;
- visa or work permit status; and
- personal information about your spouse and dependants.

It may be necessary in some circumstances for DLA to collect sensitive information about you in order to provide specific services or for recruiting purposes. Examples of the types of sensitive information that may be collected in such circumstances include professional memberships, ethnic origin, criminal record and health information.

It is generally not practical to remain anonymous or to use a pseudonym when dealing with DLA as usually we need to use your personal information to provide specific services to you, or which relate to or involve you.

Personal Information – How we collect it

We collect your personal information from you directly (for example, when we deal with you in person or over the phone, when you send us correspondence (including via email), when you complete a questionnaire, form or survey, or when you subscribe to our newsletter). Sometimes it may be necessary for us to collect your personal information from a third party. For example, we may collect your personal information from your employer where they are our client, from your personal representative or a publicly available record. We may also collect personal information about you from your client log in on our website.

Personal Information – Other peoples

If you provide us with someone else’s personal information, you should only do so if you have their authority or consent to do so. You should also take reasonable steps to inform them of the matters set out in this Privacy Policy.

Personal Information – Storage

DLA holds personal information in hard copy and electronic formats. We take security measures to protect the personal information we hold including physical (for example, our offices are protected with a security system and storage of files in lockable cabinets) and technology (for example, restriction of access, firewalls, the use of encryption, passwords and digital certificates) security measures. We also have document retention policies and processes.

Personal Information – Purpose for collecting, holding, using and disclosing

DLA collects, holds and uses personal information for a number of purposes including:

- to provide professional services;
- to provide technology services and solutions;
- to respond to requests or queries;
- to maintain contact with our clients and other contacts;
- to keep our clients and other contacts informed of our services;
- to notify of seminars and other events;
- for administrative purposes;
- for recruitment purposes;
- for purposes relating to the employment of our personnel, providing internal services or benefits to our partners and staff and for matters relating to the partnership;
- when engaging service providers, contractors or suppliers relating to the operation of our business;
- to manage any conflict of interest or independence (including auditor independence) obligations or situations;
- to conduct surveys;
- for seeking your feedback;
- to meet any regulatory obligations;
- as part of an actual (or proposed) acquisition, disposition, merger or de-merger of a business or entering into an alliance, joint venture or referral arrangement; or
- for any other business related purposes.

If you do not provide us with the personal information we have requested, we may not be able to complete or fulfil the purpose for which such information was collected, including providing you or our clients with the services we were engaged to perform.

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

- experts or other third parties contracted as part of an engagement;
- our service providers;
- our professional advisers;
- as part of an engagement, if you are a customer, an employee, a contractor or supplier of services to one of our clients, then we may disclose your personal information as part of providing services to that client;
- as part of an actual (or proposed) acquisition, disposition, merger or de-merger of a business or to enter into an alliance, joint venture or referral arrangement; or
- government or regulatory bodies or agencies, as part of an engagement or otherwise, (for example, the Australian Taxation Office).

We do not disclose personal information to third parties for the purpose of allowing them to send marketing material to you. However, we may share non personal, de-identified or aggregated information to them for research or promotional purposes.

Personal Information –Disclosure overseas

Depending on the nature of the engagement or circumstances of collection, DLA may disclose your personal information to entities overseas to fulfil the purpose for which the personal information was collected, or a related or ancillary purpose or otherwise in accordance with the *Privacy Act*. The countries to which such disclosures are made, and types of personal information disclosed, depend on the specific circumstances of the engagement. In some circumstances, we use third party service providers. These service providers are typically located in India or the Phillipines.

Personal Information – Direct marketing

DLA Partners may also use your personal information for the purpose of marketing its services. If you do not want to receive marketing material from us, you can contact us as detailed below:

- for electronic communications, you can click on the unsubscribe function in the communication; or
- for hard copy communications, you can email us through our contact details below.

Children

We understand the importance of protecting children's privacy. It is our policy to never knowingly collect or maintain information about anyone under the age of 13, except as part of a specific engagement to provide professional services which necessitates such personal information be collected.

Gaining access to personal information we hold

You can request access to your personal information, subject to some limited exceptions permitted or required by law. Such request must be made in writing. Please see our contact details below.

DLA may charge reasonable costs for providing you access to your personal information.

Keeping personal information current

If you believe that any personal information DLA has collected about you is inaccurate, not up-to-date, incomplete, irrelevant or misleading, you may request correction. To do so, please contact us and we will take reasonable steps to correct it in accordance with the requirements of the *Privacy Act*.

Complaints

If you wish to make a complaint to DLA about our handling of your personal information, please contact us. You will be asked to set out the details of your complaint in writing.

DLA will endeavour to reply to you within 30 days of receipt of the complaint and, where appropriate, will advise you of the general reasons for the outcome of the complaint. In some circumstances, we may decline to investigate the complaint, for example if the complaint relates to an act or practice that is not an interference of the privacy of the person making the complaint. If you are not satisfied with the outcome of your complaint, you can refer your complaint to the Office of the Australian Information Commissioner.

How to contact us

If you have a query in relation to this Privacy Policy or you would like to notify us that you no longer wish to receive marketing material from us, access or correct your personal information or to make a complaint about the handling of your personal information, please contact us as follows:

The Office Manager

DLA Partners
800 Zillmere Road
ASPLEY QLD 4034

T +61 7 3863 9444

F +61 7 3263 8008

E [clientservices@dlapartners.com.au](mailto:Eclientservices@dlapartners.com.au)