



**MILES MORGAN**  
A U S T R A L I A

## PRIVACY POLICY

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# Introduction

Miles Morgan Australia Pty Ltd (**MMA, our, us or we**) understands that your privacy is important and is committed to safeguarding the confidentiality and privacy of information entrusted to it. MMA respects your right to privacy and adheres to the Australian Privacy Principles (**APPs**) contained in the *Privacy Act 1988* (Cth) (**Privacy Act**).

This Privacy Policy (**Policy**) describes how MMA may collect, store, use, disclose, manage and protect your Personal Information. This Policy is to be read in conjunction with MMA's Information Security Policy.

By using any of our Services, visiting our website or otherwise providing us with your Personal Information (or authorising it to be provided to us by someone else), you agree to your Personal Information being handled in accordance with this Policy and the Privacy Act.

If you **do not** agree to us handling your Personal Information in the manner set out in this Policy we will not be able to provide our Services to you and you should not provide us with any Personal Information.

## Glossary

'**Authorised User**' means an individual or entity granted permission by MMA to have access to the Data for the purpose authorised by MMA, subject to compliance with specified terms and conditions.

'**Confidentialised**' refers to the steps a Data Custodian must take to mitigate the risk that a particular person or organisation could be identified in a dataset, either directly or indirectly. Confidentialisation requires two key steps:

1. the removal of any direct identifiers (e.g. name and address) from the Data; and
2. assessment and management of the risk of indirect identification occurring in the De-identified Data.

'**Data**' means Personal Information and Sensitive Information we collect from you for the purpose of providing the Services that may be Confidentialised.

'**Data Custodian**' means any designated MMA employee and/or contractor, or any third-party subcontractors, consultants, supplier organisations and/or partner organisations engaged by MMA to manage data.

'**Data Lifecycle**' means the process of identifying how the Data is collected, collated, transformed, validated, stored, protected, published and accessed from creation to archiving or deletion. Refer to Appendix A for an overview of MMA's approach to safeguarding each stage of the Data Lifecycle.

'**Data Security**' means the controls put in place by MMA to protect Personal Information or Sensitive Information from unauthorised (accidental or intentional) modification, destruction, disclosure, access and use. Refer to MMA's Information Security Policy for additional information.

'**Data Management**' is the implementation of policies and procedures that effectively manages the Data Lifecycle.

**'De-identified'** means Data that has been de-identified so that all personally identifiable information has been removed.

**'Personal Information'** has the same meaning as defined in the Privacy Act and refers to information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable.

**'Sensitive Information'** has the same meaning as defined in the Privacy Act and refers to:

- information or an opinion (that is also Personal Information) about an individual's racial or ethnic origin, or political opinions, or membership of a political association, or religious beliefs or affiliations, or philosophical beliefs, or membership of a trade union, or sexual orientation or practices, or criminal record; or
- health information about an individual; or
- genetic information (that is not otherwise health information); or
- biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or
- biometric templates.

## 1. Purpose for collecting information

MMA only collects, holds and uses information for the purposes for which it was provided to us, related purposes or as permitted or required by law.

We collect information for the purpose of providing business services that include collecting Personal Information and/or Sensitive Information for the following purposes:

- market research;
- applied research and evaluation;
- advocacy, including government relations;
- data analysis, including forecasting, visualisation and translation;
- development and/or operation of ICT solutions;
- providing and marketing our Services;
- managing our relationship with you/our clients;
- responding to inquiries made by you/our clients;
- managing relationships with vendors, contractors and other similar third parties, and for recruitment/management of personnel,

(together, the **Services**).

Our use of Personal Information may extend beyond the uses described above but will be restricted to purposes that we consider to be related to our functions and activities.

MMA may collect information provided by you or may collect information from a third party (for example from experts or from publicly available sources).

If you provide Personal Information and/or Sensitive Information to us about someone else (such as one of your employees or someone with whom you have business dealings) you acknowledge that you are entitled to disclose that information to us and that, without our taking any further steps, we may collect, use and disclose that information as described in this Policy.

Data may be collected and held by MMA, our delivery partner/s or sub-contractor/s and may be disclosed, published or otherwise made accessible to third parties, such as government entities, clients or researchers in accordance with this Policy.

Considering the nature of information collected as part of providing our Services, it is essential that MMA, our delivery partner/s or sub-contractor/s, comply with legislative requirements. Our delivery partner/s or sub-contractor/s may hold Data that may be able to be re-identified.

If we collect Personal Information, we may:

- use that information for the purposes stated in this Policy and in the case of Sensitive Information directly related to the purposes stated in this Policy;
- store that information in accordance with this Policy;
- pass that information amongst entities we work with including delivery partners, sub-contractors, associated organisations, business partners or affiliates;
- pass that information to third parties who provide products or services to us (including our accountants, auditors, lawyers, IT contractors, and other service providers);
- use that information for direct marketing in accordance with the APPs; and
- provide that information to third parties as required or allowed by law.

#### What types of information is collected?

The type of Personal Information we may collect, hold and process about you depends upon how you interact with us. The information may vary depending on the Services you require, however it may include your:

- name, address, email address, telephone number and other identification information;
- demographic information such as age or date of birth, location and activities;
- requests and information you input into our website to access our Services;
- information about how you interact with us, our staff, members or associates online;
- comments and feedback and responses to surveys;
- messages, emails, voicemail and other correspondence and frequency of enquiries;
- interaction with websites, including our website;
- business relationship and history with us;
- business or associated companies or entities;

- other information required to provide a Service or information you have requested from us;
- your IP address and/or other device identifying data;
- what computer configurations and software you use;
- information collected by Cookies, Web Beacons and other technologies;
- information collected by technologies we own, licence or manage; and
- any additional information relating to you that you provide to us directly.

## 2. Information handling

Under the Privacy Act, the collection of Personal Information requires notification of the collection and proposed uses and disclosures of such information. However, the collection of Sensitive Information requires the prior consent of the individual to that collection and those proposed uses and disclosures.

We will only keep your Sensitive Information whilst you consent to us doing so, or if we are required to by law or to protect a legal right. To ensure appropriate consent to collect Sensitive Information is obtained, MMA will develop tailored privacy statements that include appropriate disclosures.

MMA may disclose Data it has collected to third parties in Australia or overseas in accordance with this Policy.

## 3. Information disclosure

MMA will not transfer, disclose, sell, distribute, or lease your Personal Information to third-parties, other than as described in this Policy, unless we have your permission or are required or permitted by law.

Where MMA engages a third party to provide services related to our ICT, MMA will ensure that those vendors agree to maintain the strict confidentiality of such information and provide the same level of data security as provided by MMA.

All Data is secured using password protected computers and databases. Any digital transfer of Personal Information is via an encrypted state via FTP or VPN.

We primarily use data storage providers located inside Australia. However, some Data may potentially be stored in a jurisdiction outside of Australia. Where appropriate, MMA will confirm that its agreements with storage providers will keep the Data they store secure, using reasonable and appropriate security methods. By providing your Personal Information and/or Sensitive Information to MMA, you are consenting to the transfer and/or storage of such information across borders.

We conduct regular audits of our compliance with this Policy and the Privacy Act to ensure that our privacy framework is in line with industry best-practice.

## 4. Information security

MMA has an Information Security Policy to protect information from unauthorised loss, misuse, alteration, or destruction. MMA is committed to protecting information across the Data Lifecycle to the best of its ability.

MMA will ensure Personal Information and Sensitive Information is stored in servers which may be accessed only by Authorised Users using password protected computers and databases. MMA may also require staff, third-party delivery partner/s or sub-contractor/s to sign confidentiality or non-disclosure agreements.

Data may reside on trusted cloud services with industry leading security measures and best practices as implemented as part of the service provision. Where necessary, Personal Information and Sensitive Information will be De-identified.

MMA will comply with mandatory data breach notification requirements. In an unlikely case of a data breach, MMA will notify the affected individuals and businesses and use its best efforts to act swiftly to manage any loss or unauthorised access or disclosure of your Personal Information.

Where Data is held in ICT infrastructure developed or administered by third-party delivery partner/s or sub-contractor/s, MMA may seek regular pen testing to evaluate the security of ICT systems to identify vulnerabilities. MMA is committed to act swiftly on the results from pen testing to address security issues and protect against cyber-attacks.

### [Access to your Data from outside of Australia](#)

MMA is an Australian company committed to protecting the information it holds from unauthorised or unethical use and to meeting all responsibilities and obligations outlined in the Privacy Act. MMA will not allow any access to Data from outside of Australia (other than disclosure required or authorised by law) prior to obtaining written consent from you and will take reasonable steps to ensure that the Data is accessed in accordance with the APPs.

### [Data retention and destruction](#)

MMA take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for any purpose for which the information may be used or disclosed.

## **5. Interacting online**

We may use cookies on our website/s (small text files stored on your devices that provide us with information such as your internet protocol (IP) address, server information, internet service provider, and information on how you interact with our website) and other services that allow us to understand how you use our online media.

This information is not linked to you personally.

You may also reject cookies in your browser settings, but this may prevent you from taking full advantage of our website/s.

Our website/s may also collect certain information such as browser type, operating system, etc. However, this information is used in an aggregated manner, so we can improve our services.

Links on our websites to other third-party sites are provided for convenience only. Any third-party links that appear on our website do not constitute sponsorship, endorsement or approval of these third-party sites. MMA is not responsible for the privacy practices of these third-party sites, and we encourage you to read and understand the privacy information of any third-party website when you leave our website.

## **6. Data accuracy**

If you have submitted Personal Information to MMA, under most circumstances you have the right to reasonable access to that Data to correct any inaccuracies.

You can also make a request to update or remove information about you by contacting [privacy@milesmorgan.com.au](mailto:privacy@milesmorgan.com.au), and we will make all reasonable and practical efforts to comply with your request, so long as it is consistent with applicable law and professional standards. We reserve the right not to provide you with access to Personal Information if we cannot verify your identity to our reasonable satisfaction.

When contacting us, you can do so either anonymously or by using a pseudonym. If you do so, we may not be able to provide you with accurate or useful information, and you may not be able to access a full range of our Services. Further, we may not be able to investigate incidents or complaints you have made.

## 7. Ethics

MMA is committed to the highest quality and ethical conduct of research in accordance with the National Statement on Ethical Conduct in Human Research (National Statement).

The National Statement requires many types of human research to undergo ethics review. Where MMA is undertaking research that involves human participants, MMA's governance over data collection processes may need to be adapted to meet ethical standards and guidelines, particularly in relation to information to be collected, participation consent and any data linking.

MMA may first seek ethics advice or to clarify whether ethics approval is needed for a specific research project with a Human Research Ethics Committee (HREC) registered with the National Health and Medical Research Council (NHMRC).

Where ethics approval is required, MMA will obtain ethics approval from an NHMRC registered HREC.

## 8. Changes to this policy

MMA reserves the right to make changes to this Policy at any time. We will publish the amendments to the Policy on our website. Please make sure you review the Policy each time you visit our website to keep up to date on any changes.

## 9. Questions, comments and complaints

If you have questions or concerns regarding this Policy, please contact us at [privacy@milesmorgan.com.au](mailto:privacy@milesmorgan.com.au)

We take all complaints seriously and will respond to you within a reasonable period of time, usually [30] days, unless we consider your complaint to be frivolous or vexatious or if we are unable to verify your identity.

If you are not satisfied with the way we have handled your complaint, you can make a complaint to the Office of the Australian Information Commissioner at <http://oaic.gov.au>.



# Appendix 1: Data Lifecycle

## Best practice management of Personal Information and/or Sensitive Information

