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## PRIVACY POLICY





## Your privacy is important to us

To download a PDF copy of our privacy policy, [click here](#).

In this Privacy Policy, the expressions “3YS Owls, “we”, “us” and “our” are a reference to 3YS Owls Pty Ltd (ACN 630 849 688) trading as Governance Top 100.

This Privacy Policy may be updated from time to time. This version of the policy is dated 26 July 2020.

3YS Owls understands that protecting your information is an important part of maintaining trust between us and you.

This Privacy Policy provides information and details about how we manage the personal information that we collect, hold, use and disclose about individuals.

We are bound by the *Privacy Act 1988 (Cth)* and we manage and protect your personal information in accordance with the Australian Privacy Principles.

## Why we collect and use personal information

We collect, hold, use and disclose personal information so we can provide you with our services and operate our business. We may also collect, use and disclose your information for related purposes such as:

- ✎ Governance Top 100 event, including but not limited to providing your personal information to any sponsors and judges of the event for the purposes of holding the event and all marketing and promotion related to this event.
- ✎ Complying with our legal and regulatory obligations
- ✎ Assisting with your questions and complaints
- ✎ Arranging for services to be provided by third parties
- ✎ Internal operations, such as record keeping and data analytics
- ✎ Promotion of other products and services that may be of interest to you
- ✎ identify and tell you via direct marketing communications about other products or services offered by us or a third party that may interest you (unless you tell us not to)
- ✎ administer our client relationships
- ✎ for internal purposes, including for reporting and analytical purposes
- ✎ establish a client marketing program
- ✎ system development testing purposes
- ✎ ensure your security when visiting our website and to learn which areas of the site are of most interest to you (see the section ‘cookies’ below); and
- ✎ any other purpose related to the above.

## Other uses and disclosures

We may also use or disclose your personal information and in doing so we are not required to seek your additional consent:

- ✎ when it is disclosed or used for a purpose related to the primary purposes of collection detailed above and you would reasonably expect your personal information to be used or disclosed for such a purpose



- ✎ if we reasonably believe that the use or disclosure is necessary to lessen or prevent a serious or imminent threat to an individual's life, health or safety or to lessen or prevent a threat to public health or safety
- ✎ if we have reason to suspect that unlawful activity has been, or is being, engaged in; or
- ✎ if it is required or authorised by law.

In the event we propose to use or disclose such personal information other than for reasons outlined in this Privacy Policy, we will first notify you or seek your consent prior to such disclosure or use.

## The kinds of personal information we collect and use and disclose

The types of information we may collect about you may include:

Types of Personal Information	Details
Individual Details	Name, address, telephone number, email address, gender, employment history, social media username, company, detail, career and educational background, date and place of birth, employer, family details, marital status, photograph and other contact details.
Financial Information	Bank account details, credit card and other payment card details, income and other financial details, details of superannuation accounts, credit history details, details to enable bankruptcy, criminal history and AML/CTF checks to be undertaken.
Identification Details	Government related identifiers including drivers licence numbers, passport numbers, tax file numbers, medicare card number.
Sensitive Information	Information about your health, racial or ethical origin, political opinions, religious and philosophical beliefs, trade union memberships, genetic and biometric data and information concerning your sex life and sexual orientation.

## How we collect your personal information

As much as possible or unless provided otherwise in this Privacy Policy, we will collect your personal information directly from you.

We may also collect personal information about you from other sources, which include (but are not limited to):

- ✎ when we collect personal information about you from third parties, for example: where you are nominated by a third party as a nominee for the Governance Top 100 event
- ✎ where you are a director of a company to whom we provide our services, we generally collect your personal information from the company secretary or CFO
- ✎ other professionals who act on your behalf, such as accountant, financial adviser, lawyer
- ✎ when we collect personal information about you from publicly available sources including but not limited to, directorship and bankruptcy searches, telephone directory and social media platforms (such as Facebook, Twitter, Google, Instagram, LinkedIn etc).



## Keeping your personal information safe

Once we collect your personal information, we will strive to ensure that it is held safely and securely to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure.

By law, we are required to retain information about you, even if you cease to be a client. We may also hold certain information about you if it is needed for a purpose which you are aware of or reasonably expect us to hold the information.

Where personal information is no longer required, we take steps to de-identify or destroy the information in a secure manner.

## Sensitive information

Sensitive information is information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political organisation, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information about an individual, genetic information, biometric information that is to be used for the purpose of automated biometric verification or biometric identification or biometric templates.

We do not collect sensitive information from you without your consent. However, depending on the type of services that we provide to you, we may need to collect sensitive information from you, where you have consented and agree to the collection of such information.

## Direct Marketing

You give your express and informed consent to us using your personal information to provide you with information and to tell you about our services or events or any other direct marketing activity (including third party products, services, and events) which we consider may be of interest to you, whether by post, email, SMS, social media such as Twitter, Instagram, LinkedIn and Facebook or telephone.

You give your express and informed consent to us providing your personal information to sponsors of the Governance Top 100 event, to provide you with information about the sponsors services or events or any other direct marketing activity.

## Opt-Out

If you have received communication from us and you no longer wish to receive any communication, please contact our Privacy Officer and we will ensure the communication ceases.

## Cross Border Disclosure

Any personal information collected and held by us may be disclosed and held overseas. The most common example of when we would share your information with a destination outside Australia is where we use the services of a third-party service providers to assist us in providing our services to you, or where we have a sponsor of the Governance Top 100 event that has an overseas office.

We may use service providers including overseas IT services (including software, platforms and infrastructure), such as data hosting facilities and 'cloud' based technology services to hold your data, including your Personal Information. As a consequence, your data, including your Personal Information (and if you have provided such information, your sensitive personal information)

By using the website, you consent to your data, including your Personal Information (and where applicable, your sensitive personal information) being transferred to data centres located outside of Australia.

When we send your personal information to overseas recipients, we will take all reasonable steps to ensure



appropriate data handling and security arrangements are in place to ensure that the recipient does not breach the Australian Privacy Principles in relation to that information.

By submitting your personal information to us, you expressly agree and consent to the disclosure, transfer, storing or processing of your personal information outside of Australia.

## Collection of data using online surveys

3YS Owls may use online surveys such as SurveyMonkey, which is a third party software supplier located in the United States of America, to administer the nomination process for Governance Top 100. 3YS Owls will only use the information collected from the online nominations for the purposes of hosting the Governance Top 100 event and for statistical and marketing purposes. Information you choose to provide on these platforms, for example SurveyMonkey will be transferred to SurveyMonkey's server in the United States of America. By completing the nomination form, you agree to this transfer and Australian Privacy Principle 8.1 will not apply to this disclosure.

## Cookies

Cookies are small data files that are downloaded from our web server and stored on your hard drive. A cookie is a string of letters and numbers that uniquely identify the computer you are using, and the customer number and access code you may have used to register at the site. Cookies are used on our web site.

You can set your browser to notify you when you receive a cookie, and this will provide you with the option to either accept or reject it. If you disable cookies, it may hinder your access to full functionality of our website.

Some personal information may be collected automatically, whilst navigating through and interacting with the content of our website.

The same privacy protection applies to your personal information, whether gathered via cookies or from other sources.

## Access to and correcting your personal information

You can request access to personal information we hold, except in some exceptional circumstances as provided by law. There may be a cost involved with locating, copying or sending you the information you request. The cost will be discussed and agreed with you at the time.

The accuracy of personal information depends largely on the information you provide to us, so we recommend that you notify us of changes to your personal information (such as your name or address) and any errors in your personal information, to ensure it is accurate, up-to-date, complete, relevant and not misleading, having regard to the purpose for which it is held.

If you would like access to or correct any records of personal information, we have about you, please contact our Privacy Officer.

If you wish to remain anonymous or to use a pseudonym when dealing with us, we may only be able to provide you with limited information or services. In many cases it will not be possible for us to assist you with your specific needs if you wish to remain anonymous or use a pseudonym.



## Complaints about privacy

If you have any privacy related questions, would like further information on our Privacy Policy and information handling practices or wish to make a complaint, please contact our Privacy Officer:

Mail PO Box 6395, GCMC QLD 9726

Phone 1300 3YS OWLS (397 695)

Email [ainslie@3ysowls.com.au](mailto:ainslie@3ysowls.com.au)

Website [www.governancetop100.com.au](http://www.governancetop100.com.au)

We will acknowledge receipt of a complaint as soon as practicable. We will then investigate the complaint and make all reasonable efforts to respond to you within 30 days.

If you are not fully satisfied with our response, you can contact the **Office of the Australian Information Commissioner (OAIC)**. The contact details for OAIC are:

Mail GPO Box 5218 Sydney NSW 2001

Phone 1300 363 992

Email [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

Online [www.oaic.gov.au](http://www.oaic.gov.au)