

PRIVACY POLICY

Shadow Office Solutions is committed to protecting the privacy and confidentiality of clients and staff in the way information is collected, stored and used. This policy provides an outline of Shadow Office Solution's legal obligations and ethical expectations in relation to privacy and confidentiality.

Open and Transparent Management of Personal Information

We will manage personal information in an open and transparent manner. In doing so, we ensure that individuals are notified at the time of collecting their personal information:

- What type of personal information is being collected;
- Who that personal information will be disclosed to; and
- How we use that personal information

The role of the Privacy/Compliance Officer will be dealing with any queries regarding access to or collection of personal information or any privacy related complaints. We ensure all our employees are trained at regular intervals to ensure they understand our obligations under the Privacy Act, including the Australian Privacy Principles.

The following is an example of what is in our privacy policy.

Anonymity and Pseudonymity

We are not able to deal with customers who do not wish to identify themselves. However, where possible and appropriate we will provide information of a general nature to unidentified individuals, this will be information of a generic nature and not relevant to any specific client/customer or employee.

Collection of Personal Information

We collect personal information for the following purposes:

- Providing individuals and clients with the products or services they have requested;
- Managing our relationship with individuals and clients;
- Protecting individuals, clients and ourselves from error or scams; or
- Complying with regulatory requirements.
- Employment of staff.

We only collect sensitive information directly from the individual or client and with the individual's and client's signed consent.

We may also collect sensitive information when it has been provided as part of a client/customer agreement or relation to employment requirements. Any sensitive information that is collected in this way is only used for the purpose for which it is provided and is collected with the individual and client's consent. Where possible, we collect personal information directly from the individual or client.

Unsolicited Personal Information

If we receive unsolicited personal information, we will determine whether we could have collected that personal information by lawful and fair means, and whether it is related to one of the purposes of collecting personal information above. We will do this by looking at our relationship with the individual or client and whether the personal information relates to our relationship with them.

If we could not have collected the personal information by lawful and fair means, or the personal information does not relate to one of our purposes for collecting the personal information, we will destroy the personal information.

Use or Disclosure of Personal Information

The purpose of collecting an individual's and client's personal information will be outlined in the notification and consent received by the individual or the client.

If during our relationship with the individual we wish to use an individual's personal information for an additional purpose, we will obtain their consent unless the purpose is related to the primary purpose or we are permitted under law to do so.

Notification of the Collection of Personal Information

When we first collect personal information from an individual or client, we will notify them that we have collected their personal information. We will require the individual or the client to sign a notification and consent form detailing how we will use and disclose their personal information.

This notification will provide the individual or client with information about:

- The purposes of the collection of their personal information;
- Those entities that we usually disclose personal information to;
- What happens if the individual or the client chooses not to provide us with personal information;
- Direct marketing that may be undertaken by us or any related companies;
- When we are required to collect personal information under an Australian law;
- Our privacy policy and where it can be found; or
- Any disclosure of personal information that we make to an overseas entity.

If we know that as part of our relationship with the individual and the client we will disclose their personal information to another identifiable entity, we will notify the individual or the client of the following matters at the time we first collect their personal information:

- The identity and contact details of that organization; and
- Why their information may be disclosed to the organization.

Direct Marketing

We notify individuals or clients at the time of collecting their personal information that their personal information will be used by us and any associated businesses for the purposes of direct marketing.

In all our direct marketing communications we will provide a prominent statement about how an individual or a client can elect not to receive direct marketing. If the direct marketing communication is an email we will provide an 'unsubscribe' function within the email.

We will keep appropriate records to ensure those individuals or clients that have made requests not to receive direct marketing communications do not receive them. We do not apply a fee to unsubscribe from direct marketing communications.

We do not sell personal information. We do not use sensitive information for the purposes of direct marketing. If we purchase personal information for the purposes of direct marketing, we will conduct appropriate due diligence to ensure appropriate consents from the individuals or clients have been obtained.

Cross-Border Disclosure of Personal Information

Generally, when carrying out our core business activities in providing our products and services, we do not disclose client information to overseas countries and when we do so we take reasonable steps to ensure that the overseas entity protects that information against unauthorized access or loss, such as entering into a contract with the organization providing that service. Currently Shadow Office Solutions is likely to disclose customer information to only the Philippines.

We may use Cloud Storage and IT servers that may be located overseas to store the personal information we hold.

Adoption, Use or Disclosure of Government Related Identifier

We do not use government related identifiers to identify individuals.

Quality of Personal Information

We rely on individuals or clients to help us to ensure that their personal information is accurate, up-to-date and complete.

If we become aware that personal information is inaccurate, out-of-date, or incomplete, such as when mail is returned, we will update ours and funders systems accordingly.

Security of Personal Information

The following security principles form the basis of the policies that have been included in this document:

- Data must be processed in a secure environment
- Access to all data will be on a “need to know” basis
- Data must be protected from unauthorized modification, destruction, or disclosure whether accidental or intentional
- The level of controls protecting data will depend upon the sensitivity and value of the data
- All users are accountable for any action that is performed under their individual user ID
- The minimum access required allowing performance of a specific function will be granted
- Access granted for a specific function must not be used for any other purpose

Privacy Controls of Client Information

Every effort has been made to ensure we are complying with the Privacy Act and best practices. Controls in place are as follows:

- Clean Desk policy and practice is adhered to by way of all staff filing any “paper” work or file in locked cupboards and nothing is left on their desk.
- Locks on all cupboards for storage of customer files, cupboards are locked at the end of every day.
- All papers that need to be securely destroyed are put in the locked document destruction bins
- All managers are responsible to make sure at the end of the day all cupboards are locked and no staff has any customer information left on their desk.
- The Privacy Policy is made available on our website and is changed in accordance with the Australian Privacy Principles.
- Spot checks are performed in all offices randomly to ensure adherence to policy, these checks are recorded.
- Access to network is for current working employees only. Access to network is based on job role and function (this applies also to access to borrower files).
- Signature and identification verification procedures over borrower information before disclosure occurs.

Access to Personal Information

Individuals or clients may request access to any personal information that we hold about them. We will not charge an individual for requesting access to their personal information.

We will verify the individual’s or client’s identity prior to disclosing any personal information.

When an individual or a client requests access to their personal information we will conduct a search of our customer relationship database. This search will also indicate if there are any paper records that contain personal information.

We will not give access to the personal information that we hold about an individual or a client where it is unreasonable or impracticable to provide access, or in circumstances where the request would likely:

- Pose a serious threat to the life, health or safety of any individual and client or to public health or public safety;
- Unreasonably access the privacy of other individuals;
- Be frivolous or vexatious;
- Relate to anticipated legal proceedings, and the correct method of access to personal information is by the process of discovery in those legal proceedings;
- Reveal the intentions of the entity in relation to negotiations with the individual in such a way as to prejudice those negotiations;
- Be unlawful or in breach of an Australian law;
- Prejudice the taking of appropriate action in relation to a matter where unlawful activity or misconduct that relates to our functions or activities;
- Prejudice an enforcement related activities of an enforcement body (such as ASIC); or
- Reveal commercially sensitive information.

When we receive a request for access, we will usually respond to the individual within 7 days. Depending on the nature of the request we may be able to provide the personal information at the same time as when the request is made.

If the individual or client is requesting a large amount of personal information or the request cannot be dealt with immediately, then after we have investigated the request for access, we will advise the individual what personal information we hold and provide details of that personal information.

We will comply with all reasonable requests by an individual or a client to provide details of the personal information that we hold in the requested format.

If we do not provide access to the information, we will provide written reasons setting out why we do not believe we need to provide access. We will also advise the individual or the client they can access our Internal Dispute Resolution (IDR) and External Dispute Resolution (EDR) schemes if they are dissatisfied with a decision not to provide access to personal information.

Correction of Personal Information

If we hold personal information about an individual or a client and we are reasonably satisfied that the information is inaccurate, out of date, incomplete, irrelevant, or misleading, or we receive a request to correct the information, we will take reasonable steps to correct the information.

If we correct any personal information that we have previously disclosed, we will take reasonable steps to notify the entity to which we disclosed the information of the correction. We may not always make corrections to an individual's or client's personal information. When we do not make requested corrections, we will provide reasons for our refusal to make the correction and provide details of our IDR and EDR procedures. If, after notifying the individual or the client of our refusal to correct personal information, the individual requests us to issue a statement on the record that contains the personal information; we will take reasonable steps to do so.

We ensure our Privacy Policy, and the operation of the entire business is current and compliant with any legislative and/or changes directly relating to the Privacy Act. The Privacy of Client Information is also referred to in both our Compliance Program Policy.

Access and Correction of your Personal Information

If we hold personal information about an individual or a client and we are reasonably satisfied that the information is inaccurate, out of date, incomplete, irrelevant, or misleading, or we receive a request to correct the information, we will take reasonable steps to correct the information.

If we correct any personal information that we have previously disclosed, we will take reasonable steps to notify the entity to which we disclosed the information of the correction. We may not always make corrections to an individual's or client's personal information. When we do not make requested corrections, we will provide reasons for our refusal to make the correction and provide details of our IDR and EDR procedures. If, after notifying the individual or the client of our refusal to correct personal information, the individual requests us to issue a statement on the record that contains the personal information; we will take reasonable steps to do so.

We ensure our Privacy Policy, and the operation of the entire business is current and compliant with any legislative and/or changes directly relating to the Privacy Act. The Privacy of Client Information is also referred to in both our Compliance Program Policy.

Complaints

If you are dissatisfied with how we have dealt with your personal information, or you have a complaint about our compliance with the Privacy Act, you may contact our complaints officer at:

Shadow Office Solutions

Unit 2.16, Level 2, Versatile Building 1,
29-31 Lexington Drive, Bella Vista NSW 2153
T: 1300 505 767
E: mail@shadowoffice.com.au
W: shadowoffice.com.au

Under the Privacy Act you may complain to the Office of the Australian Information Commissioner about the way handle your personal information.

The Commissioner can be contacted at:

GPO Box 5218
Sydney NSW 2001
T: 1300 363 992
E: enquiries@oaic.gov.au
W: oaic.gov.au