Will Organise Pty Ltd
(ABN 84 606 495 381)

Adopted: *26 March 2019*

PRIVACY POLICY

1. INTRODUCTION; APPLICATION OF PRIVACY LAWS

Will Organise understands that privacy is an important issue for individuals. Whilst, as a small business, we may not be legally bound to comply with the Australian Privacy Principles, we have nonetheless adopted this Privacy Policy to declare our policies and procedures in the handling of Personal Information and to give individuals assurance that we will take reasonable steps (as outlined in this document) to protect the privacy of Personal Information that we collect.

In any particular case we will be happy to provide further detail of our treatment of Personal Information, subject to our obligations of confidentiality, and the sensible restraints of security.

Also, we aim to continuously improve our protection of privacy and this policy may change over time.

2. SOME IMPORTANT EXPRESSIONS DEFINED

In this Policy, the following words and expressions have the following respective meanings:

Act means the Privacy Act 1988 (Cth)

Personal Information means information which identifies (or can reasonably be used to identify) an individual.

Privacy Principle means the "Australian Privacy Principles" as set out in the Act.

Will Organise, means Will Organise Pty Ltd (ABN 84 606 495 381). References to "We" "Our" and "Us" and cognate expressions are references to Will Organise.

Sensitive Information includes Personal Information concerning (or that implies) an individual's health status or illness, philosophical, religious or ethnic background, membership of a professional or trade association.

3. ACCOUNTABILITY

It is the responsibility of all Will Organise staff to comply with privacy laws and this policy. We will conduct periodic training in and obtain professional advice on the management of Personal Information for our staff.

We will, where commercially and legally possible, reasonable and appropriate, request Our contractors to agree to comply with this policy and with the provisions of the *Privacy Act*.

4. CONSENT AND OUR APPROACH TO IT

If we consider that we need the consent of an individual in relation to Personal Information, we will not put undue pressure on the individual to give consent. We will make reasonable endeavours to ensure that individuals can make an informed and voluntary decision.

5. WHAT KINDS OF PERSONAL INFORMATION DO WE NORMALLY COLLECT? HOW AND FOR WHAT PURPOSES DO WE COLLECT IT?

The kinds of Personal Information we collect, the way we collect it and our purpose of doing so depends on a variety of circumstances, including the nature of our interaction with that person. The individuals from/about whom we collect information fall into the following main categories:

- clients or staff of clients who may be acquiring or proposing to acquire our services;
- individuals who attend the conferences and other events that we manage for our clients;
- suppliers of goods and services to us and our clients; and
- individuals who are members of the trade and professional associations and organisations for which we provide secretariat and membership management services.

What information do We collect?

We usually only collect names, addresses, phone numbers and email details.

We also collect Sensitive Information in the following instances:

- health information, where that may be relevant to the supply of food and beverage to individuals with special dietary needs, at events we manage;
- information concerning an individual's religious, ethnic or philosophical background or allegiance, where that is relevant to food and beverage supplied to them at events we manage, or to other aspects of those events; and
- in the case of the secretariat and membership management services we provide for trade and professional association clients, the fact of membership to those associations it itself sensitive information as defined in the Act.

Purpose of collection of Personal Information

We collect Personal Information for the purposes of providing our services and to enable us to manage our commercial relationship with our clients, suppliers and conference attendees. We also collect and retain the information so we can let individuals know of our services and any relevant news on our events and activities.

Where we collect Sensitive Information, it is usually so that:

- in the case of the events we manage, we can ensure that culturally-sensitive or health-sensitive services and goods including food and beverage, are provided to attendees; and'
- in the case of secretariat and membership management services we provide to trade and professional associations, to enable us to do that work.

How do We collect Personal Information?

In the case of attendees at the conferences and events we manage, we collect Personal Information direct from attendees, from our client or from an external supplier of conference registration services. Such Personal Information will usually be supplied to Us by electronic means, such as emails, or by on-line attendance registration procedures.

6. HOW DO WE HOLD THE PERSONAL INFORMATION WE COLLECT?

We hold the Personal Information we collect in a variety of ways, including on our electronic (computer) database and, in some cases also on file in hard copy.

We have adopted various security measures to protect this information from unauthorised access (see below).

7. WILL WE DISCLOSE PERSONAL INFORMATION TO OTHERS?

(a) Clients and conference/event attendees: In addition to the exceptions listed below, we will disclose Personal Information to third parties only as you would reasonably expect in the provision of our services – for example, to suppliers that we engage to provide goods and services in respect of the conference/event.

The circumstances will determine what information will be disclosed – but we will do our best to ensure that no more than the information that is necessary or desirable will be disclosed in the interests of delivering a quality conference/event.

In some cases, we may need to pass on Sensitive Information, where this is necessary to arrange the supply of culturally sensitive goods or services to you or for health reasons. For example, we may need to advise a venue if you have special dietary requirements that may be based on religious or philosophical beliefs, or that arise because you have a particular food allergy.

(b) Secretariat and membership management services we provide to our trade and professional association clients: We will not usually disclose personal information obtained in relation to members to third parties (other than our client association itself and to other members of the organisation), subject to the exceptions below.

Exceptions:

In addition to the suppliers we engage to supply goods and services for our clients' conferences and events, we may from time to time outsource management of certain functions, such as:

- our website and other information technology, including our data-base of contacts and clients; and
- marketing; and
- accounting.

In such cases the external service provider may have access to Personal Information. In such cases it is our policy to include, where commercially possible and appropriate, provisions in the contract with the service provider that obliges the service provider to comply with our privacy policy and to comply with the Privacy Act and Australian Privacy Principles.

We may also disclose your Personal Information to our professional advisers, such as our lawyers in any case where we need to seek advice.

Apart from disclosure to third parties that would be reasonably expected and is reasonably necessary to conduct our work, we will not otherwise disclose an individual's Personal Information to other third parties unless:

- we have the individual's consent;
- making the disclosure is related to the primary purpose for which we have collected the information and we deem that the individual would reasonably have expected us to make the disclosure;
- we are required to do so by law, in which case we would inform the individual, unless doing so itself is unlawful or would impede or defeat the purpose of the disclosure; or

- we are negotiating a sale of Our business, in which case we will disclose the information only if the other party with whom we are negotiating agrees to refrain from use of the information until it completes the purchase.

We will never sell an individual's Personal Information unless we have the individual's express consent; or the sale is part of a sale of our business or a part of our business.

8. OVERSEAS DISCLOSURE

In some instances, we may be dealing with a client or providing services in respect of an event taking place overseas. If we need to disclose Personal Information to any person overseas, we will not do so unless:

- we are aware that privacy laws in the overseas country provide similar protection for the privacy of the individual as applies in Australia under the Act; or
- we obtain the consent of the individual.

9. SECURITY OF YOUR PERSONAL INFORMATION

It is not appropriate in this Policy to provide specific details of security measures we have adopted to protect the privacy of Personal information we hold. To do so could compromise those security measures.

We will use an appropriate combination of:

- physical measures including locks and physical barriers;
- alarm systems;
- access technology, password systems and encryption where appropriate; and
- administrative protocols,

to exclude unauthorised persons or intruders from gaining access to the Personal Information we hold.

We have acquired and will continue to acquire (reasonably within Our means) computer technology and other appropriate technology, such as password security protocols and "fire-walls" to prevent or retard unauthorised access into Our computer system.

10. YOUR ACCESS AND CORRECTION RIGHTS

We will provide individuals access to the Personal Information which we hold about them - unless the Act (if it applied) would allow us to deny access to some or all of the Personal Information concerned, or to provide an explanation for a decision instead.

Some circumstances where the Act (if it applied to us) would allow us to deny access are where:

- providing access would unreasonably be to the detriment of the privacy of another individual;
- the request is frivolous or vexatious;
- the requested information relates to existing or anticipated legal proceedings between us and the individual;
- giving access would reveal our intentions in relation to negotiations with the individual and prejudice those negotiations; or
- providing access would be unlawful or if denying access is required or authorised under law.

This is not an exhaustive list of circumstances where we may reserve the right to deny access.

When an individual requests access to Personal Information, we will require a written request.

We will respond to requests for access as soon as possible and will acknowledge the request within 14 days and deal with it within 30 days or earlier. Though we may ask, we will not *require* an

explanation of *why* the request has been made as a pre-requisite to giving access. We will not charge a fee for access.

If we determine to deny access to the whole or part of Personal Information requested, we will provide a short explanation, but we will not provide details of Our reasoning.

11. USE OF GOVERNMENT IDENTIFIERS

We will not use government identifiers such as tax file numbers or Medicare numbers as a means of identifying an individual.

12. ANONYMITY

Given the personal nature of Our services, it is not normally appropriate for individuals to remain anonymous in their dealings with us. If we conduct a survey, usually we will not ask for Personal information that will identify the individual.

13. CONTACTING US AND COMPLAINTS

If an individual:

- has an enquiry about our management of personal information or privacy procedures;
- wishes to request access to Personal Information;
- wishes to see a copy of this Policy document; or
- wishes to make a complaint about our handling of Personal Information that person can contact Us by the following means:

Phone: +61 2 4319 8519

Email: willorg@willorganise.com.au

Postal Address: The Privacy Officer, Will Organise Pty Limited, 1/3 Watt St Gosford, NSW, 2250

Complaints must be made in writing. This will allow us to deal with complaints in a professional, sensitive and consistent manner.

We will acknowledge receipt of a request within 14 days of receiving it and We will respond within 30 days of receipt. We will also do our best to deal with the complaint within that time, assuming that we are able to investigate and ascertain the necessary facts in that time. We will let you know if it is likely to take much longer.

Complainants will be given an opportunity to put their complaint in writing, to propose a remedy for the complaint and to discuss the matter with us.

We will determine, in the case of each complaint (if any), what is to be done, if anything, to redress the complaint. Also, we will assess whether the complaint demonstrates a systemic problem and will make a determination as to how we can address/rectify such issues so they do not recur.

Alicia Smith
Director
Will Organise Pty Ltd