

Groundlvl Privacy Policy

Purpose of policy

This Privacy Policy applies to the collection, use, disclosure and handling of personal information by Groundlvl and its associated entities (collectively **we** or **us**), including personal information collected via our website (**Website**).

Groundlvl is committed to protecting the privacy of individuals and is bound by the Australian Privacy Principles set out in the *Privacy Act 1988* (Cth) (**Privacy Act**). We will only collect, use, disclose and handle personal information in accordance with the Privacy Act and this Privacy Policy.

Your use of our Website is also subject to our Website Terms of Use.

Collection

Groundlvl collects personal information from you in a number of different ways. We may collect personal information directly from you or in the course of our dealings with you, for example when you:

- provide personal information to us (for example, as part of a marketing consultation);
- apply for a position of employment with us;
- use our Website or services (including via cookies); and
- contact and correspond with us, for example to ask for information.

We may also collect personal information about you from publicly available sources of information, or in some cases, from third parties including recruitment agencies, previous employers, government departments (e.g., Department of Immigration and Border Protection) and third-party service providers which provide criminal, bankruptcy and other checks.

The personal information we collect about you may include (but may not be limited to) your name, date and place of birth, contact details, Internet Protocol (IP) address, occupation and education/work history, employer, legal and industry areas of interest, passport details and information relating to your dealings with Groundlvl and our clients.

We may also collect sensitive information about you, including health information and criminal background checks.

The purposes for which we collect your information may include:

- verifying your identity;
- contacting you (including via electronic messaging such as SMS and email, by mail, by phone or in any other lawful manner);
- providing you with marketing or media services;
- marketing our products and services (as well as special offers) to you; and
- developing and improving our services and obtaining feedback.

If we are not able to collect personal information about you, we may not be able to provide you with products, services and assistance to the extent that they require us to collect, use or disclose personal information.

Use and disclosure

Groundlvl may use or disclose your personal information for the purpose for which it was collected. We will also use and disclose your personal information for a secondary purpose that is related to a purpose for which we collected it, where you would reasonably expect us to use or disclose your personal information for that secondary purpose.

Other instances when we may use and disclose your personal information include:

- where you have expressly or impliedly consented to the use or disclosure;
- in confidence, to our advisers and insurers;
- in confidence, to third parties to improve our services and obtain feedback; and
- where the use or disclosure is authorised or required by or under an Australian law or court/tribunal order.

We may also disclose your personal information to third parties, including:

- other Groundlvl group entities;
- with our advisors and consultants; and
- with third party service providers we use in conducting our business, subject to confidentiality provisions as we deem appropriate (including, without limitation, insurance brokers, banks, external photocopying providers, document production, legal outsourcing providers, billing or data storage services, email filtering, virus scanning and other technology services providers, and archival services providers).

Some of the third parties to whom we disclose your personal information may be located outside Australia. For example, we may disclose your personal information to external national or overseas facilities in the course of conducting information and data processing, back-up and scanning or for the purposes of obtaining other services from third parties.

The countries in which these third parties are located will depend on the circumstances. However, in the course of our ordinary business operations we commonly disclose personal information to third parties located in the following countries:

- Canada;
- New Zealand;
- the United States of America;
- the United Kingdom;
- Ireland; and
- Poland

Information about events, the Website and our services

We may contact you via email, SMS or other means in order to provide you with updated information about the Website, in relation to events or to provide you with other information about our services or your matter. If you do not wish to receive any such information, please contact us as set out below.

The information we keep about you

You have a right to request access to or correction of your personal information held by us. If you wish to access, correct or update any personal information we may hold about you, please contact us as set out below. However, we may charge for providing access to this information and we may refuse access where the Privacy Act allows us to do so.

Notifiable Data Breaches Scheme

In the event of any loss, or unauthorised access or disclosure of your personal information that is likely to result in serious harm to you, Groundlvl will investigate and notify you and the Office of the Australian Information Commissioner as soon as practicable, in accordance with the Privacy Act.

Complaints process

If you have any questions or concerns about our collection, use or disclosure of personal information, or if you believe that we have not complied with this Privacy Policy or the Privacy Act, please contact us as set out below. The Privacy Officer will investigate the complaint and determine whether a breach has occurred and what action, if any, to take. When contacting us, please provide as much detail as possible in relation to the query, issue or complaint.

We will take any privacy complaint seriously. We will aim to resolve any such complaint in a timely and efficient manner, and our target response time is 30 days. We request that you cooperate with us during this process and provide us with relevant information we may require.

We expect our procedures will deal fairly and promptly with your complaint. However, if you remain dissatisfied, you can also make a formal complaint with the Office of the Australian Information Commissioner (which is the regulator responsible for privacy in Australia):

Phone number	1300 363 992
Mailing address	GPO Box 5218, Sydney NSW 2001
Website	www.oaic.gov.au

Storage and security of your personal information

Groundlvl will take reasonable steps to keep any personal information we hold about you secure. However, except to the extent liability cannot be excluded due to the operation of statute, Groundlvl excludes all liability (including in negligence) for the consequences of any unauthorised access to your personal information. Please notify us immediately if you become aware of any breach of security.

We may store your files in hard copy or electronically in our ordinary IT systems. These may include Australian-based cloud servers or the servers of third parties within Australia.

When we have disclosed your personal information to third parties, your files may be stored by or transferred to entities located outside of Australia. The storage or transfer of your personal information by these third parties will be subject to confidentiality provisions as we deem appropriate.

We implement a range of physical and electronic security measures to protect the personal information that we hold, including:

- restricted access to all offices;

- mandatory password protection on all computers (users are required to change their passwords at regular intervals);
- hardware encryption on desktops, laptops and portable storage devices;
- secure hard copy document, electronic storage media and hardware disposal procedures;
- firewall and antivirus/malware software; and
- systems and application access controls implemented to restrict access to information (on a need-to-know basis).

Changes to this Privacy Policy

This Privacy Policy was last updated on 1 July 2024. We may change this Privacy Policy at our discretion. By continuing to use the Website, or otherwise continuing to deal with us, you accept this Privacy Policy as it applies from time to time.

Contact us

Please direct any privacy issues or queries to our Privacy Officer at info@groundlvl.com.au