

## **PRIVACY POLICY**

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### **1. Introduction**

The HEMISPHERE MANAGEMENT GROUP in Australia is committed to treating the personal information we collect in accordance with the Australian Privacy Principles in the *Privacy Act 1988 (Cth) (Privacy Act)*. This Privacy Policy sets out how The HEMISPHERE MANAGEMENT GROUP handles personal information.

The HEMISPHERE MANAGEMENT GROUP collects information for the primary purpose of providing quality health care and safety support. This Privacy Policy does not apply to personal information collected by The HEMISPHERE MANAGEMENT GROUP that is exempted under the *Privacy Act*, for example employee records.

THE HEMISPHERE MANAGEMENT GROUP may modify this Privacy Policy from time to time to reflect its current privacy practices.

In this Privacy Policy, 'THE HEMISPHERE MANAGEMENT GROUP', 'we', 'us' and 'our' is a reference to THE HEMISPHERE MANAGEMENT GROUP, and includes any entity carrying on business in Australia that is part of THE HEMISPHERE MANAGEMENT GROUP, group of entities.

## **2. Personal information we may collect**

We gather personal details and medical history so that we may properly assess, diagnose, and treat illnesses and medical conditions, ensuring we are proactive in the provision of health care. The types of personal information we may collect include:

- names, job titles, contact and address details;
- information in identification documents (for example, passport, driver's licence);
- medical information including known or suspected illnesses, diseases, ailments or other conditions;
- tax file numbers and other government-issued identification numbers;
- date of birth and gender;
- bank account details, shareholdings and details of investments;
- details of superannuation and insurance arrangements;
- educational qualifications, employment history, salary and referee reports;
- visa or work permit status;
- your Internet Protocol (IP) address;
- payment details; and
- personal information about your spouse and dependants.

It may be necessary in some circumstances for The HEMISPHERE MANAGEMENT GROUP to collect sensitive information about you in order to provide specific services, such as planning for or providing medical treatment, or for recruiting purposes. We may collect information from other sources relevant to the specific purpose including test results, Medicare details, other care or safety providers including specialists. Examples of the types of sensitive information that may be collected in such circumstances include professional memberships, ethnic origin, criminal records, and health information.

It is generally not practical to remain anonymous or to use a pseudonym when dealing with The HEMISPHERE MANAGEMENT GROUP, as usually we need to use your personal information to provide specific services to you, or which relate to or involve you.

## **3. How we collect and manage personal information**

### **3.1 How we collect personal information**

Generally, we collect your personal information from you directly (for example, when we deal with you in person or over the phone, when you send us correspondence (including via email), when you complete a questionnaire, form or survey, when you subscribe to our publications or when you use our website or our social media).

Sometimes it may be necessary for us to collect your personal information from a third party. For example, we may collect your personal information from your employer where they are our client, from your personal representative, another The HEMISPHERE MANAGEMENT GROUP member firm, or a publicly available record.

We may also collect personal information about you from your use of our website, and information you provide to us through contact mailboxes, or through any other dealing with us.

### **3.2 Where you provide us with personal information about someone else**

If you provide us with someone else's personal information, you should only do so if you have their authority or consent to provide us with their personal information. You should also take reasonable steps to inform them of the matters set out in this Privacy Policy, or any Privacy Collection Statement we give you.

### **3.3 Holding personal information**

The HEMISPHERE MANAGEMENT GROUP holds personal information in hard copy and electronic formats. We take security measures to protect the personal information we hold including physical (for example, security passes to enter our offices or venues, and storage of files in lockable cabinets) and technology (for example, restriction of access, firewalls, the use of encryption, passwords and digital certificates) security measures. We also have document retention policies and processes.

### **3.4 Purpose for collecting, holding, using and disclosing personal information**

The HEMISPHERE MANAGEMENT GROUP collects, holds and uses personal information for a number of purposes including:

- to provide professional or medical services;
- to provide technology services and solutions;
- to respond to requests or queries;
- to maintain contact with our clients and other contacts (including alumni);
- to keep our clients and other contacts informed of our services and industry developments;
- to notify of seminars and other events;
- to verify your identity;
- for administrative purposes, including processing payment transactions;
- for recruitment purposes;
- for purposes relating to the employment of our personnel, providing internal services or benefits to our partners and staff and for matters relating to the partnership;
- when engaging service providers, or other The HEMISPHERE MANAGEMENT GROUP arms, contractors or suppliers relating to the operation of our business;
- to manage any conflict of interest or independence (including auditor independence) obligations or situations;
- to conduct surveys;
- for seeking your feedback;
- to meet any regulatory obligations;

- as part of an actual (or proposed) acquisition, disposition, merger or de-merger of a business (including The HEMISPHERE MANAGEMENT GROUP's business) or entering into an alliance, joint venture or referral arrangement;
- to perform internal statistical analysis, including of our databases and website;
- for any other business-related purposes.

If you do not provide us with the personal information we have requested, we may not be able to complete or fulfil the purpose for which such information was collected, including providing you or our clients with the services we were engaged to perform.

The types of third parties to whom we may disclose your personal information include:

- experts or other third parties contracted as part of an engagement;
- our service providers;
- our professional advisers;
- other The HEMISPHERE MANAGEMENT GROUP elements;
- as part of an engagement, if you are a customer, an employee, a contractor or supplier of services to one of our clients, then we may disclose your personal information as part of providing services to that client;
- as part of an actual (or proposed) acquisition, disposition, merger or de-merger of a business (including The HEMISPHERE MANAGEMENT GROUP's business) or to enter into an alliance, joint venture or referral arrangement; or
- government or regulatory bodies or agencies, as part of an engagement or otherwise, (for example, the Australian Taxation Office).

We do not disclose personal information to third parties for the purpose of allowing them to send marketing material to you. However, we may share non-personal, de-identified or aggregated information to them for research or promotional purposes.

### **3.5 Disclosure of personal information overseas and sharing personal information amongst and within The HEMISPHERE MANAGEMENT GROUP network**

The HEMISPHERE MANAGEMENT GROUP operate globally with varying partners and service providers. Depending on the nature of the engagement or circumstances of service provision, we may disclose your personal information to other HEMISPHERE MANAGEMENT GROUP members overseas to fulfil the purpose for which the personal information was collected, or a related or ancillary purpose or otherwise in accordance with the *Privacy Act*. The countries to which such disclosures are made, and types of personal information disclosed, depend on the specific circumstances of the engagement.

We may also store, process or back-up your personal information on servers that are located overseas (including through third party service providers). These servers are commonly located in the United States of America and the United Kingdom

## **4. Direct marketing**

The HEMISPHERE MANAGEMENT GROUP may also use your personal information for the purpose of marketing its services. If you do not want to receive marketing material from us, you can contact us as detailed below:

- for electronic communications, you can click on the unsubscribe function in the communication; or
- for hard copy communications, you can email [info@thehemispheregroup.com.au](mailto:info@thehemispheregroup.com.au); or
- through our contact details below.

## **5. Privacy on our websites**

### **5.1 Cookies and web beacons**

Cookies and web beacons are used on The HEMISPHERE MANAGEMENT GROUP website, primarily to enhance your online experience and to make our sites more useful and attractive to you.

Cookies are small text files placed on your computer when you first visit the site. Most browsers now recognise when a cookie is offered and permit you to refuse or accept it. If you are not sure whether your browser has this capability, you should check with the software manufacturer, your company's technology help desk or your internet service provider.

A web beacon is a clear picture file that is placed on a website or in an email that is used to monitor the behaviour of a user visiting the website or sending an email. When the HTML code for the web beacon points to a site to retrieve the image, at the same time it can pass along information such as an IP address of the computer that retrieved the image, the time the web beacon was viewed and for how long, the type of browser that retrieved the image and previously set cookie values.

### **5.2 Your choices**

You have several choices regarding your use of The HEMISPHERE MANAGEMENT GROUP's website. In general, you are not required to provide personal information when you visit our website. However, if you apply to receive information about our services, events and industry updates or wish to apply for a job, provision of certain personal information will generally be required.

### **5.3 Links to third party websites**

The HEMISPHERE MANAGEMENT GROUP's website may contain links to third parties' websites. Those other websites are not subject to our privacy policy and procedures. You will need to review those websites to view a copy of their privacy policy. The HEMISPHERE MANAGEMENT GROUP also does not endorse, approve or recommend the services or products provided on third party websites.

## **6. Children**

We understand the importance of protecting children's privacy, especially in an online or medical environment. In particular, our website is not intentionally designed for or directed at children under the age of 13. It is our policy to never knowingly collect or maintain information about anyone under the age of 13, except as part of a specific engagement to provide professional services which necessitates such personal information be collected or for the purposes of ensuring compliance with our auditor independence policies.

## **7. Gaining access to personal information we hold**

You can request access to your personal information, subject to some limited exceptions permitted or required by law. Such request must be made in writing to the National Privacy Officer. Please see the 'How to contact us' section for details.

The HEMISPHERE MANAGEMENT GROUP may charge reasonable costs for providing you access to your personal information.

## **8. Keeping personal information current**

If you believe that any personal information The HEMISPHERE MANAGEMENT GROUP has collected about you is inaccurate, not up-to-date, incomplete, irrelevant or misleading, you may request correction. To do so, please contact the National Privacy Officer and we will take reasonable steps to correct it in accordance with the requirements of the *Privacy Act*. Please see the 'How to contact us' section for details as to how to contact the Privacy Officer.

## **9. Complaints**

If you wish to make a complaint to The HEMISPHERE MANAGEMENT GROUP about our handling of your personal information, you can contact the Privacy Officer as set out in the 'How to contact us' section. You will be asked to set out the details of your complaint in writing in a form provided.

The HEMISPHERE MANAGEMENT GROUP will endeavour to reply to you within 30 days of receipt of the completed complaint form and, where appropriate, will advise you of the general reasons for the outcome of the complaint. In some circumstances, the Privacy Officer may decline to investigate the complaint, for example if the complaint relates to an act or practice that is not an interference of the privacy of the person making the complaint. If you are not satisfied with the outcome of your complaint, you can refer your complaint to the Office of the Australian Information Commissioner.

## **10. How to contact us**

If you have a query in relation to this Privacy Policy or you would like to notify The HEMISPHERE MANAGEMENT GROUP that you no longer wish to receive marketing material from us, access or correct your personal information or to make a complaint



about The HEMISPHERE MANAGEMENT GROUP's handling of your personal information, please contact The HEMISPHERE MANAGEMENT GROUP as follows:

**Privacy Officer**

The HEMISPHERE MANAGEMENT GROUP  
91 Canal Street LILYFIELD NSW 2040  
**T** +61 415 051 323  
**E** [info@thehemispheregroup.com](mailto:info@thehemispheregroup.com)

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