



BBSA

Privacy Policy

December 2017



BBSA Privacy Policy

Preface

This statement sets out the Privacy Policy of Bull & Bear Special Assignments Pty Ltd (ABN 23 095 556 854) (“BBSA”, “Bull&Bear”, “we”, “us”) and the practices that we will follow to respect the privacy of individuals who deal with us (“you”).

This statement is provided in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (“APP’s”) which are set out therein.

Collection of Personal Information

The kinds of personal information which we collect and hold generally include the following:

- Names
- Addresses (including email addresses)
- Telephone and facsimile numbers
- Date of Birth
- Occupation and Job Title
- Gender
- Education
- Details about next of kin including spouse and children’s names
- Financial Details
- Membership of professional associations
- Social interests

The information which we collect, and hold may come from a number of sources including:

- While carrying out client engagements
- Potential employees
- Independent contractors
- Existing and new contacts and clients of Bull&Bear
- Other individuals

Some information which we hold may be “Sensitive Information”

We will only collect your Sensitive Information with your consent or if we are required to do so by law. Sensitive Information is information or an opinion about an individual's:

- Race or ethnic origin
- Political opinion
- Membership of a political association
- Religious beliefs, affiliations or philosophical beliefs
- Membership of a professional or trade association or membership of a trade union
- Health information
- Sexual orientation or practices
- Criminal record

We will not collect your personal information unless the information is necessary for, or directly related to, one or more of our functions or activities.

We will collect your personal information only by lawful and fair means and not in an unreasonably intrusive way.

Whenever we collect and store your personal information, we will take reasonable steps to bring this Privacy Policy statement to your attention (for example, by referring to it in our client contracts or by making it available to you on our website, www.bbsa.com.au to inform you of the following matters:

- Our identity and contact details
- The purposes for which we collect your information
- The intended recipients or organisations to which we usually disclose your information,
- The fact that you are able to gain access to your information and ask us to correct it
- The fact that you may make a privacy complaint and how we will deal with it
- Any law that requires the particular information to be collected
- The main consequences (if any) for you if all or part of the information is not provided

Where it is reasonable and practical to do so, we will collect your personal information only from you. If, however we collect this information from someone else, we will act reasonably to ensure that you are or have been made aware of the matters listed above.

Where we receive unsolicited personal information about you, we will within a reasonable period of time, determine whether we could have collected such information in the manner set out in this privacy policy statement above.

If so, then our privacy policy will apply to the processing of the information. Otherwise, we will, if lawful and reasonable, either destroy or de-identify the information.

The Purposes for which we use Personal Information

The purposes for which we use personal information include the following:

- To provide professional services to our clients
- To respond to requests from individuals
- To consider potential employee's applications for employment with us
- To open and administer our client accounts
- To provide professional services to our clients
- To administer our independent contractors
- For any other purpose related to the business we carry out.

If you do not provide us with all or part of your personal information, we may not be able to carry out the purposes which are set out above, including the provision of professional services to you.

Use and Disclosure

As a general rule, we will not use or disclose your personal information other than for its primary purpose of collection, unless:

- You have consented to the use or disclosure; or
- You would reasonably expect us to use or disclose your non-Sensitive Information for a secondary purpose and the secondary purpose is related to the primary purpose; or
- We have reason to suspect that unlawful activity has been, or may be engaged in, and use or disclose your personal information as a necessary part of our investigation of the matter or in reporting our concerns to relevant persons or authorities; or
- The use or disclosure is required or authorised by or under law; or
- We reasonably believe that the use or disclosure is reasonably necessary for a specified purpose by or on behalf of an enforcement body; or
- We reasonably believe the use or disclosure is necessary to prevent or lessen a serious and imminent threat to public health or public safety or the life or health of an individual.

We may also disclose your personal information to our service providers who assist us with the provision of client services, administrative support or our general business operations. These service providers are generally located within Australia, however in some cases they may operate outside of the jurisdiction. We remain responsible for maintaining the confidentiality of information which we disclose to our service providers and ensure that contracts with these parties contain terms that confirm personal information is managed according to the same standards which we have implemented within BBSA.

Direct Marketing

We may use your personal information for our direct marketing purposes where:

- The information has been collected from you and you would reasonably expect us to use it for that purpose; or
- The information has been collected from someone other than you and we have either obtained your consent, or it is impractical for us to obtain your consent before that particular use
- We provide a simple means by which you may easily request not to receive direct marketing communications from us
- In each direct marketing communication with you, we draw to your attention, or prominently display a notice, that you may express a wish to “unsubscribe” or not to receive any further direct marketing communications
- You have not made a request to us not to receive direct marketing communications.
- When engaging in direct marketing activities we will:
- Not charge you for giving effect to a request not to receive direct marketing communications from us
- Only use Sensitive Information about you if you have consented to the use or disclosure of your information for that purpose
- Always be subject to any overriding obligations under anti-spam or do-not-call legislation.

Data Quality

We will take reasonable steps to make sure that the personal information we collect, use or disclose is accurate, complete, up to date and not misleading.

Data Security

We will take reasonable steps to protect the personal information we hold from misuse, interference and loss and from unauthorised access, modification or disclosure. We will not keep personal information for longer than is necessary and will take reasonable steps to destroy or permanently de-identify personal information if there is no longer a legal or business requirement for us to retain it.

Openness

We have set out in this document our policies on management of personal information and will make this document available free of charge to anyone who asks for it. On request by a person, we will take reasonable steps to let that person know, generally, what sort of personal information we collect and hold, for what purposes, and how we collect, hold, use and disclose that information.

Access and Correction

As a general rule, we will on request by you, provide you with access to your personal information within a reasonable time after such request is made and consider any further request from you for correction of that information. We may impose a reasonable charge upon you to cover the cost of locating, retrieving, reviewing and copying any material requested. We may in some limited circumstances choose not to provide you with access to your personal information where we are permitted to do so. This may include instances where providing access would be unlawful or providing access would have an unreasonable impact on the privacy or affairs of other individuals. In circumstances where we have refused you access to, or correction of, your personal information, we will give you a written notice that sets out:

- the reasons for the refusal where it is reasonable for us to do so; and
- the way in which you may make a complaint about such refusal.

Identifiers

We will not adopt a government related identifier or other unique identifier (such as a tax file number or Medicare number) as our identifier of you. We will not use and/or disclose government related identifiers unless such use or disclosure is reasonably necessary for us to verify your identity for the purpose of our activities, or alternatively, the use or disclosure is required or authorised under law.

Anonymity

Wherever it is lawful and practical, we will allow you the option of not identifying yourself or of using a pseudonym when entering into transactions with us.

Changes to this policy

We may change our privacy policy as needed. If changes to the privacy policy are made, please note that it may take up to 30 business days before new privacy practices are implemented and this statement is amended. The amended privacy policy will apply whether or not we have given you specific notice of any change. Please check this statement periodically if you would like to monitor changes to our privacy policy.

How can an Individual Complain about Possible Breaches of Privacy by us

A complaint by you regarding an alleged breach of privacy by us should be forwarded in writing to the following address:

Privacy Compliance Officer
Bull Bear Special Assignments Pty Ltd
GPO Box 44
Canberra ACT 2601

OR (2/29 Flinders Way,
Manuka, ACT 2603)

If you are not happy with the resolution of your complaint by us, you may then complain to the Privacy Commissioner or Industry Code adjudicator about the act or practice you consider to be an interference with your privacy. The Commissioner then has the power to investigate the alleged breach by examining witnesses, obtaining documents and directing individuals to attend compulsory conferences. The Privacy Commissioner's determinations in such cases are enforceable by the Federal Court or Federal Magistrates Court.