

Policy No: HR-PO-029
Process Area: Human Resources & Administration

1 PURPOSE

City FM is committed to providing quality services to you. This policy outlines how we manage your Personal Information in accordance with the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth).

The APPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information. A copy of the APPs may be obtained from the website of The Office of the Australian Information Commissioner at www.oaic.gov.au/.

2 SCOPE

2.1 What kinds of Personal Information do we collect?

Examples of Personal Information we collect includes identifying and contact information such as names, addresses, email addresses, phone and facsimile numbers. We may collect log-in information such as usernames and passwords which you create for accounts with us, or technical information from your use of our website and apps (such as your IP address).

We may also collect financial information (such as bank account or other payment details) and product information such as details of how you use our services and records of our communications with you.

We collect your personal information in many ways including correspondence, by telephone, by email, via our website www.Cityfm.com.au and our apps, from your website, from media and publications, from other publicly available sources and from third parties.

We may also collect personal information when you register an account with us, order products or services from us, apply for a job with us, or submit a query or request to us.

2.2 Purposes for which we use and disclose Personal Information

We use and disclose Personal Information that we collect about you for the following purposes:

- providing our products and services;
- providing information to our clients;
- to answer your queries or requests;
- to comply with our legal and regulatory obligations;
- to carry out market analysis and research;
- to monitor use of, assess, maintain, upgrade and improve our products and services;
- to carry out training programs for our personnel;
- to manage and resolve any legal or commercial complaints or issues; and
- to keep you informed about our activities.

When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it. We may also use and disclose your information for other purposes as authorised by you, or in accordance with your requests or instructions.

3 Third Parties

Where we collect Personal Information from you, we will generally do so directly ourselves. However, in some cases we may collect Personal Information from a third party, such as through your representatives, contractors who provide services to us, or third parties who refer you to us because they think you may be interested in our products or services.

4 Disclosure of Personal Information

We may disclose your Personal Information to:

- your representatives, advisers and others you have authorised to interact with us on your behalf;
- our personnel who need the information to discharge their duties;
- related entities within our corporate group;
- our business partners, agents and service providers;
- payment system operators and financial institutions;
- prospective purchasers of all or part of our business or shares in our company or a related entity;
- professional advisers who we engage to provide advice on our business; and
- government authorities who ask us to disclose that information, or to other people as required by law.

In some cases, the people to whom we disclose your personal information may be located overseas and may be subject to different privacy regimes. The countries in which these people are likely to be located include: the United Kingdom, the United States, Singapore and Malaysia.

5 Security of Personal Information

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

6 Access to your Personal Information

You may access the Personal Information we hold about you and update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing.

City FM will not charge any fee for your access request but may charge an administrative fee for providing a copy of your Personal Information.

In order to protect your Personal Information, we may require identification from you before releasing the requested information. There may be cases where we are unable to provide the information you request, such as where it would interfere with the privacy of others or result in a breach of confidentiality. In these cases we will let you know why we cannot comply with your request.

7 Maintaining the quality of your Personal Information

It is an important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

8 Complaints

We try to meet the highest standards in order to protect your privacy. However, if you are concerned about the way in which we are managing your Personal Information and think we may have breached the APPs, or any other relevant obligation, please contact us using the contact details set out below. Complaints must be lodged in writing. We will deal with the matter within a reasonable time, and will keep you informed of the progress of our investigation.

If we have not responded to you within a reasonable time or if you feel that your complaint has not been resolved satisfactorily, you can contact us to discuss your concerns. You are also entitled to make a complaint to the Office of the Australian Information Commissioner (OAIC). Contact details can be found at the OAIC's website: www.oaic.gov.au.

9 Policy Updates

This Policy may change from time to time and the latest version of this Policy is available on our website.

11 Privacy Policy Enquiries

If you have any queries about our Privacy Policy, please contact us at:

10 Nexus Court, Mulgrave VIC 3170
info@city-holdings.com.au
+61 3 8562 07777

12 DOCUMENT CONTROL

Approval

	Title	Name	Signature	Date
Administrator	Communications & Project Coordinator	Lucy Foreman		11/11/2019
Approver	General Manager of People & Culture	Paul Hopkins		11/11/2019

Version History

The following table lists the changes made to this Policy:

Version	Date	Amended By	Brief Summary of Changes