

# Privacy Policy

---

---

Effective Date: 2 July 2019

## About this statement

We are committed to respecting the privacy of your personal information.

This policy statement explains how we collect, store, use and disclose personal information and what steps we take to comply with privacy laws.

In this Policy, we use the terms "**us**", "**we**" and "**our**" to refer to the **IMANI Partners Pty Ltd** ACN 632 433 697.

We are bound by the *Privacy Act 1988 (Cth)* (**Privacy Act**) including the Australian Privacy Principles (**APPs**) and are committed to protecting personal information we may hold at any time in respect of any individual, in accordance with those requirements.

Those principles do not apply to certain records and practices relating to the employment relationship between us and our employees. In addition, certain disclosures of personal information between related bodies corporate do not have the same protection as disclosures to other persons.

We may, in connection with particular services we offer or provide to you, make other privacy disclosures to you or seek your authority to use your personal information in ways which are different from or more specific than those stated in this Privacy Policy. In the event of any inconsistency between the provisions of this Privacy Policy and those other disclosures, the other disclosures will apply.

It is important that you read and understand this Privacy Policy.

## What is "personal information"?

"Personal information" is information or an opinion about a reasonably identifiable individual. The types of personal information that we collect includes the following information about you which is relevant to our relationship or the product or service you are enquiring about or we may provide to you: name, address, contact details, date of birth, financial details such as income, savings and expenses and information from other financial institutions, employment details and reasons for your desire to receive our services.

We may also collect information regarding your internet activity (including your location) when you use our website or online services.

### **Why do we collect your personal information?**

We only collect, hold and use personal information about you which is necessary for us to provide services to you or to comply with the law.

We will tell you the main reasons for collecting your personal information when we ask for it, however, the purposes for which we will generally collect and use your information include considering your objectives with respect to property acquisition or development and providing services to you, performing administrative functions, conducting customer satisfaction research improving our services and developing new services and telling you about other products and services, including those offered by third parties, which may be of interest to you. You may tell us at any time that you do not want us to advise you about other products and services (refer to *Marketing* below for more details).

We may also collect your personal information to comply with legislative and regulatory requirements.

If you choose not to provide your Personal Information to us for the purposes set out in this Privacy Policy, we may not be able to provide our services to you.

### **When and how do we collect personal information?**

We ordinarily collect personal information directly from you or where it is provided to us with your authority (e.g. from a person appointed to act on your behalf). We may also collect personal information about you from other third parties however we will only collect your personal information in this way if it is unreasonable or impractical to collect this information directly from you or if we are otherwise permitted to do so by you, or by law.

Examples of how and when we may collect personal information about you include when you:

- attend meetings, seminars or other functions in which we are involved or sponsor;
- complete an application, consent or other form;
- visit our website;
- register your interest for our services;
- request information about us or our services;
- provide feedback to us or about us;
- apply for a position of employment with us;
- submit an online form on our website or email us from our website;
- enquire about our services through our website, via telephone or through social media; or
- otherwise contact us by the internet, telephone, SMS, fax, email, post or in person.

We may also be required to collect personal information about you from a third party. These parties may include financial institutions, your representatives such as financial advisers or accountants, your insurers, publicly available sources (eg. telephone directories), brokers, referrers or other intermediaries and government agencies (eg. Centrelink).

In addition to the above, we may use technology called “cookies” to collect statistical information on our website use (refer to *Our internet websites* below for more information). When you call us on the telephone, we may monitor and in some cases record the telephone conversation for staff training and record-keeping purposes. Further, when we communicate with you by email, we may use technology to identify you so that we will be in position to know when you have opened the email or clicked on a link in the email.

If personal information about you is collected by third parties on any website you have accessed through our websites, we may also collect or have access to that information as part of our arrangement with those third parties.

We may also collect basic personal information about third parties (e.g. an employer) if provided by you as part of us providing our services.

Finally, from time to time we may receive information that we have not asked for about you from third parties. We will only keep, use and disclose this information as permitted by law.

### **How do we store personal information?**

We store your personal information in a number of ways including:

- in electronic systems and devices;
- in telephone recordings;
- in paper files; and
- document retention services off-site.

This may include storage on our behalf by third party service providers (refer below to *How we protect your personal information*, for more information)

### **How do we protect personal information?**

We take all reasonable steps to protect your personal information from misuse, loss and unauthorised access, modification or disclosure. These include:

- using appropriate information technology and processes;
- restricting access to your personal information to our employees and those who perform services for us who need your personal information to do what we have engaged them to do;
- protecting paper documents from unauthorised access or use through security systems we deploy over our physical premises;
- using computer and network security systems with appropriate firewalls, encryption technology and passwords for the protection of electronic files;

- securely destroying or “de-identifying” personal information if we no longer require it subject to our legal obligations to keep some information for certain prescribed periods; and
- requesting certain personal information from you when you wish to discuss any issues relating to the products and services we provide to you.

Whilst we take reasonable measures, no data transmission over the Internet can be guaranteed as fully secure and accordingly, we cannot guarantee or warrant the security of any information you send to us using our online forms or products. You submit information over the Internet at your own risk.

### **Why do we exchange personal information with third parties?**

We may need to disclose personal information about you to certain organisations in connection with the provision of services to you.

The types of organisations to which we may disclose this information include regulatory bodies and government agencies, courts and external dispute resolution schemes or providers, your agents, brokers, referrers and other intermediaries, agents, contractors and professional advisers who assist us in providing our services, your referees and your or our insurers, organisations that carry out functions on our behalf including mailing houses, data processors, researchers, debt collectors, system developers or testers, accountants, auditors, valuers and lawyers.

We may also disclose your personal information to third parties where you request us to or consent to us doing so or in order to fulfil our legal obligations.

The information we provide to other organisations will be limited to what is required to provide the service or comply with the law.

#### ***Exchange of information with related bodies corporate***

We may exchange information with our related bodies corporate.

#### ***Exchange of information with overseas parties***

Some of the parties with which we are likely to exchange your personal information, including our service providers and other third parties listed above, may be located outside Australia in countries including New Zealand, USA and Canada.

## Marketing

From time to time we may also use your personal information to let you know about other services from us that you might be interested in. We might also want to let you know about products and services from our partners and other companies.

If you don't want to receive advertising materials, please contact us on 1300 755 492.

## Accessing and correcting personal information

We take reasonable steps to ensure that your personal information is accurate, complete and up-to-date.

You may request access to the personal information we hold about you at any time by contacting our Privacy Officer using any of the following means:

**Telephone:** 1300 755 492

**Email:** [enquiries@imanimarketing.com](mailto:enquiries@imanimarketing.com)

**Mail:** IMANI Marketing, Level 17, 344 Queen Street, Brisbane Q 4000

In certain circumstances, we may be unable to give you access to all of your personal information in our possession. Some of these circumstances include:

- where giving you access would compromise some other person's privacy;
- where giving you access would disclose commercially-sensitive information of ours or any of our agents or contractors;
- where we are prevented by law from giving you access; or

- where we are prevented by law from giving you access, or
- where the personal information you request relates to existing or anticipated legal proceedings.

If we are unable to give you access, we will consider whether the use of an intermediary is appropriate and would allow sufficient access to meet the needs of both parties.

Where we do grant access to your information, we may charge you a fee for accessing your personal information.

Under the Privacy Act, you also have a right to request that we correct information that you believe to be inaccurate, out of date, incomplete, irrelevant or misleading. If at any time you believe that personal information about you is inaccurate, out of date, incomplete, irrelevant or misleading, please advise us by contacting our Privacy Officer using any of the following means and we will take all reasonable steps to correct the information:

**Telephone:** 1300 755 492

**Email:** [enquiries@imanimarketing.com](mailto:enquiries@imanimarketing.com)

**Mail:** IMANI Marketing, Level 17, 344 Queen Street, Brisbane Q 4000

If we don't correct the information, you can also ask us to include with the information held, a statement from you claiming that the information is not correct.

If there is a denial of access to your personal information or a dispute as to the correctness of any personal information held, we will provide you with reasons for the denial or its refusal to correct the personal information. If you disagree with our decision for the denial or refusal to correct the personal information, you may request that we review the decision via our complaints handling procedures which are outlined below.

### **Dealing with us anonymously or using an alias**

We will generally need to know who you are in order to provide you with our services.



Despite this, in some circumstances you are entitled to deal with us anonymously, or by using a pseudonym (alias), for example when making general enquiries about the services we offer.

In some circumstances, you may receive a better service or response if we know who you are. For example, we can keep you up-to-date and better understand a complaint you might have if we know who you are and the circumstances of your complaint.

You must tell us when you are using a pseudonym when applying for our services. If we need to identify you, we will tell you whether or not your real name is required to access those services.

### **Changes to this Privacy Policy**

This statement sets out our current Privacy Policy. It replaces any of our other Privacy Policies which have been issued before the date of this Privacy Policy.

Please note that this Privacy Policy may change from time to time. We will notify you of any change by posting an updated version on our website at [imanimarketing.com](http://imanimarketing.com). You may also obtain a copy of our current Privacy Policy by telephoning us on 1300 755 492.

We encourage you to periodically review our Privacy Policy for any changes.

### **Our internet websites:**

This Privacy Policy applies to our website operated by us at the following domain name, [imanimarketing.com](http://imanimarketing.com) and any other website/s operated by us or on our behalf which we authorise to provide a link to this Privacy Policy.

When you use a link from our website or from any other website to which this Privacy Policy applies, to the websites of third parties, those websites are not subject to our privacy standards. Those third parties are responsible for informing you of their own privacy policies.

### ***Click Stream Data***

When you visit and browse our website, our website host may collect information for statistical, reporting and maintenance purposes. The information collected by our website host is used to administer and improve the performance of our website and will not be used to identify you. The information may include:

- the IP address of your computer;
- the date, time and duration of the visit to the site;
- the pages accessed and documents downloaded;
- the previous site visited; and
- the type of browser used.

### ***Cookies***

"Cookies" are small text files that may be transferred to your computer's hard drive by the websites you visit for the purpose of tracking and storing information about a user's identity, browser type or website visiting patterns.

Cookies may be used on our website to monitor web traffic, for example the time of visit, pages visited and some system information about the type of computer being used. We use this information to enhance the content and services offered on our website.

Cookies are sometimes also used to collect information about what pages you visit and the type of software you are using. If you access our website or click-through an email we send you, a cookie may be downloaded onto your computer's hard drive.

Cookies may also be used for other purposes on our website but in each case none of the information collected can be used to personally identify you. You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.

If you disable the use of cookies on your web browser or remove or reject specific cookies from our website or linked sites then you may not be able to gain access to all of the content and facilities in those websites.

### ***Web Beacons***

Web beacons are images that originate from a third party site to track visitor activities. We may use web beacons to track the visiting patterns of individuals accessing our website.

### ***Email address***

We will record your email address if you send us a message. It will be used only for the purpose for which you have provided it and will only be added to a mailing list if you first provide your consent that we may do so. It will not be used for any other purpose and we will not disclose it without your consent. You are reminded that email sent over the Internet is not secure, and could be intercepted without your knowledge. We have other methods of receiving information such as mail, fax and telephone and you may prefer to use one of these methods.

### **Lodging complaints:**

We are committed to resolving any complaint you may have. Complaints can be received in several different ways:

- in person;
- by phone;
- in writing;
- via email; or
- via our website.

### ***Internal Dispute Resolution***

Our representative will be in contact with you regarding your complaint and will let you know who will be assisting you, their contact details and the expected resolution date of your issue within 48 hours.

If the issue is a more complicated one, we may ask you for additional documentation to help resolve the issue. In turn, we will keep you updated on the progress of your complaint.

If you are not satisfied that the matter has been resolved, we can forward the complaint to our Complaints Officer. This person will review the complaint and take further actions in an attempt to resolve it.

You may contact the Complaints Officer by any of the following means:

**Domestic Telephone:** 1300 755 492

**International Telephone:** +611300 755 492

**Mail:** IMANI Marketing, Level 17, 344 Queen Street, Brisbane Q4000

### **Contacting us**

If you have any questions or concerns about the way we manage your personal information, including if you think we have breached the Privacy Act including the APPs, please contact our Privacy Officer by any of the following means:

---

**Telephone:** 1300 755 492

**Email:** [enquiries@imanimarketing.com](mailto:enquiries@imanimarketing.com)

**Mail:** IMANI Marketing, Level 17, 344 Queen Street, Brisbane Q 4000

