



## Privacy Policy

Clarity Point is committed to providing quality services to you and to protecting the privacy of all personal – and commercial – information we receive.

We have adopted the Australian Privacy Principles (APPs) contained in the *Privacy Act 1988* (Cth) (the Privacy Act). The APPs govern the way we collect, use, disclose, store, secure and dispose of your Personal Information. You can find a copy of the Australian Privacy Principles on The Office of the Australian Information Commissioner's website: [oaic.gov.au](http://oaic.gov.au).

In this policy 'we', 'us' and 'our' refer to Clarity Point and 'you' refers to anyone whose personal or business information we collect and/or hold.

### Personal information

Clarity Point works predominantly with businesses rather than individuals, however we protect the Personal Information of the people within those businesses.

#### What is Personal Information and why do we collect it?

'Personal Information' is information or an opinion about an identified (or reasonably identifiable) individual. Examples of Personal Information we collect include names, postal/email addresses, and phone numbers.

This Personal Information is obtained in many ways, including meetings, by phone or email, via our website ([claritypoint.com.au](http://claritypoint.com.au)), from your website, from media and publications, from other publicly available sources, and from third parties.

We collect your Personal Information for the primary purposes of providing services to you and for marketing. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

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.

#### Sensitive Information

'Sensitive Information' is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Due to the nature of our business we are unlikely to collect Sensitive information, however if we do it will only be with your consent (or where required or authorised by law) and only for:

- The primary purpose for which it was obtained.
- A secondary purpose that is directly related to the primary purpose.

#### Third parties

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties, and will take reasonable steps to ensure that you are made aware of the information that a third party provides to us.

## Disclosure

Your Personal Information may be disclosed in a number of circumstances including the following:

- Third parties where you consent to the use or disclosure; and
- Where required or authorised by law.

## Information security

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorised 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 it. However, most Personal Information is or will be stored in client files which will be kept by us for a minimum of seven years.

## Access to 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. To protect your Personal Information we may require identification from you before releasing it.

Clarity Point will not charge you for your access request, but may charge an administrative fee for providing a copy of your Personal Information.

## Maintaining quality and accuracy

It is 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 current. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as possible so we can amend our records.

## Business information

We acknowledge that your sensitive and/or proprietary businesses information may be discussed during preparatory meetings and subsequent service delivery. Clarity Point maintains complete confidentiality of all business information and respects your ownership of this information.

Information currently within the public domain, or information that is subsequently available in the public domain through the actions of others, is specifically excluded.

We will:

- Use confidential business information solely for the purpose of working with you and providing services to you, or for other purposes you have agreed to; and
- Notify you if we have:
  - Been requested to disclose your confidential business information, or
  - Been, or are likely to be, compelled by law to disclose your confidential business information, or
  - Intentionally or inadvertently disclosed confidential information to someone outside Clarity Point;

## Policy updates

This policy, last updated in 2020, may change from time to time and is available on our website (see below).

## Privacy complaints and enquiries

If you have any queries or complaints about how we manage privacy and uphold this privacy policy, please contact us through our website ([claritypoint.com.au/contact](https://claritypoint.com.au/contact)) or phone +61 (0)414 360 555.