

THREAD CONSULTING PTY LTD

Privacy Policy

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Our privacy obligations

Thread Consulting Pty Ltd is governed by the Australian Privacy Principles (APPs) under the *Privacy Act 1988* (Cth). The APPs regulate how personal information is handled by us.

‘Personal information’ means information or an opinion about an identified individual, or an individual who is reasonably identifiable. Our Privacy Policy applies to personal information collected and/or held by us.

We will review this policy regularly, and we may update it from time to time.

The types of personal information we collect and hold

We collect personal information about our clients’ employees and their stakeholders, as part of our routine activities.

We also collect personal information about our staff, contractors and suppliers, as well as the contact details of individuals who work for contractors and suppliers, and other types of professional associates and personal contacts.

How we collect personal information

Information that you specifically give us

We may ask you to provide us with certain types of personal information associated with delivering our products and services. Most commonly this will be contact information by email, Teams and sometimes telephone.

This might happen over a video or telephone call, through our website, by filling in a paper form, or meeting with us face-to-face. We will give you a briefing at the time to explain how we will use the personal information we are asking for. The notice may be written or verbal.

You might also provide your personal information to us without us directly asking for it, for example if you engage with us on social media.

Information that you give us about your organisation, policies, operations or performance will generally be shared by you on a system where you control access (e.g. SharePoint, Google Drive). Where copies are provided by you by email or other transmission method, we will securely manage and dispose of this information in line with the confidentiality provisions of our contract.

Information that we collect from others

If you apply for a job or contract with us, we will collect personal information about you from your referees. With your consent we may also use a third-party service to ensure your employment,

educational and identity records are valid. We may also check some details about our suppliers from publicly available sources, such as the Australian Business Register and ASIC databases.

If you provide us with information for analysis as part of our work, we may check publicly available sources to validate the data. Under some circumstances we may seek related data collected from third parties, for instance salary comparison data, which may be drawn from data brokers or from the public domain.

Information that we generate ourselves

We maintain records of the interactions we have with clients and their stakeholders, including the products and services we have provided to you.

We collect limited information about users of our websites, for diagnostic and analytic purposes. We use cookies and gather IP addresses to do so, but we do not trace these back to individual users.

We generate notes and working documents during our engagements in which we may record our observations and/or understanding of your comments. This information is kept on our secure drive, with access limited to TC staff.

The types of personal information we collect

The types of personal information we collect about clients and their stakeholders includes:

- Name and contact details (email, Teams and phone)
- Employment roles and responsibilities at a point in time.

Links to other sites

On our website, we may provide links to third party websites. These linked sites are not under our control, and we cannot accept responsibility for the conduct of companies linked to our website. Before providing your personal information via any other website, we advise you to examine the terms and conditions of using that website and its privacy policy.

How we use personal information

We may use your personal information for the following purposes:

- to provide the service or product you have requested
- to provide technical or other support to you
- to answer your enquiry about our services, or to respond to a complaint
- to manage our employment or business relationship with you

- to promote our other programs, products or services which may be of interest to you (unless you have opted out from such communications)
- if otherwise permitted or required by law, or
- for other purposes with your consent, unless you withdraw your consent.

We will keep personal information about you, to use for the above purposes, for the lifetime of an engagement (as detailed in the contract).

When we disclose personal information

Our third-party service providers

The personal information of clients and their stakeholders, staff, suppliers and other contacts may be held on our behalf outside Australia, including 'in the cloud', by our third-party service providers. Our third-party service providers are bound by contract to only use your personal information on our behalf, under our instructions.

Our third-party service providers are Microsoft, Xero, Webcentral and Survey Monkey.

Other disclosures and transfers

We may also disclose your personal information to third parties for the following purposes:

- if necessary to provide the service or product you have requested
- if otherwise permitted or required by law; or
- for other purposes with your consent.

Security of your personal information

We will take reasonable security measures to protect personal information from loss, unauthorised access, use, modification or disclosure. Our standard security measures include multi-factor authentication for access to services containing personal information.

We will take reasonable steps to ensure personal information is stored securely, not kept longer than necessary, and disposed of appropriately. Non-current contacts will be removed from our records no later than three years beyond the end of the engagement.

Accessing or correcting your personal information

You have the right to request access to the personal information Thread Consulting Pty Ltd holds about you. Unless an exception applies, we must allow you to see the personal information we hold about you, within a reasonable time period, and without unreasonable expense.

You also have the right to request the correction of the personal information we hold about you. We will take reasonable steps to make appropriate corrections to personal information so that it is accurate, complete and up-to-date. Unless an exception applies, we must update, correct, amend or delete the personal information we hold about you within a reasonable time period. We do not charge for making corrections.

To seek access to, or correction of, your personal information, please contact our Privacy Officer.

To contact our Privacy Officer

If you have an enquiry or a complaint about the way we handle your personal information, or seek to exercise your privacy rights in relation to the personal information we hold about you, you may contact our Privacy Officer as follows:

OUR PRIVACY OFFICER IS:

Alison Gibbins
Partner, Thread Consulting

Telephone: +61 0408 446 110
Email: alison.f.gibbins@gmail.com

While we endeavour to resolve complaints quickly and informally, if you wish to proceed to a formal privacy complaint, we request that you make your complaint in writing to our Privacy Officer, by mail or email as above. We will acknowledge your formal complaint within 10 working days.

If we do not resolve your privacy complaint to your satisfaction, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC) by calling them on 1300 363 992, making a complaint online at www.oaic.gov.au, or writing to them at OAIC, GPO Box 5218, Sydney NSW 2001.