



### **Application**

Heritage Corporate is committed to ensuring that all personal information collected from individuals such as clients and employees is afforded an appropriate level of privacy protection. Heritage Corporate is subject to obligations under the Privacy Act 1988 and the Australian Privacy Principles, including in relation to its collection, use, disclosure and storage of personal information, including additional requirements for particular types of information such as tax file numbers and health information.

### **Collection of personal information**

Heritage Corporate collects personal information from its clients as part of the account opening process and its employees and contractors as part of its due diligence when offering them employment.

Heritage Corporate may collect personal information through various methods including:

- upon application for services – verbally on a recorded telephone line or in writing by completing an application form;
- upon request to update records maintained by Heritage Corporate – such requests may be subject to identity verification;
- from the individual's representatives and organisation;
- from public sources, for example details relating to directors, shareholders and officeholders of a corporation; and
- from third parties such as related companies and the parties with whom Heritage Corporate exchanges information as described here.

The types of personal information Heritage Corporate collects includes names, contact details, employment, payment details, interests, preferences, opinions and details of dealings with us, including through any contact by telephone, email or online.

For staff and job applicants, Heritage Corporate may also collect information about qualifications, skills, experience, character, screening checks (including health, reference, background, directorship, financial probity, identity, eligibility to work, vocational suitability and criminal record checks), performance, conduct, use of IT resources and payroll details.

### **Recording of personal information**

Heritage Corporate will maintain records detailing personal information:

- of its previous and current clients to ensure that it is able to identify its clients and for the purpose of providing financial products and services to its clients; and
- of its previous and current employees to the extent necessary and required by governing law and for any other purpose associated with your employment at Heritage Corporate.

### **Use of personal information**

Heritage Corporate may use and handle personal information about individuals:

- as the individual consents;
- for the purpose of providing the financial products and services the individual requests and for other purposes for which the information was given to Heritage Corporate;

- to manage relationships with those individuals;
- to maintain and update records about the individual;
- to recruit, train and manage staff;
- as required for law enforcement, public health or public safety reasons;
- for product development purposes;
- in connection with acquisitions and potential acquisitions of Heritage Corporate's business;
- to protect Heritage Corporate's lawful interests; and
- as otherwise required or authorised by law.

Heritage Corporate may not be able to do these things if it is unable to collect personal information required. In relation to staff, refusal to provide certain information may in some cases affect the individual's ability to perform a particular role or task, and Heritage Corporate may take appropriate action as a result.

### **Use of personal information for direct marketing**

Heritage Corporate may use personal information for direct marketing purposes from time to time. If Heritage Corporate sends direct marketing material, Heritage Corporate will allow the recipient to opt out of receipt of further marketing information, at that time. Such requests can also be made by emailing or otherwise contacting Heritage Corporate's Privacy Officer as set out below.

### **Disclosure of personal information**

In providing clients with the financial products and services they have requested and in the course of its operation, Heritage Corporate may exchange personal information with others, including:

- parties that are contracted by Heritage Corporate to provide a particular service, such as providers of printing, scanning, data storage, technology, legal, insurance, payroll and superannuation;
- to meet legal obligations, for example in response to a subpoena issued by a court or to a Government agency; and
- Heritage Corporate's related companies.

Heritage Corporate may also exchange personal information of staff and job applicants with academic institutions, recruiters, screening check providers, health service providers, professional and trade associations, law enforcement agencies, referees and other employers seeking references.

### **Security of personal information**

Heritage Corporate employs a range of measures to protect the security of personal information. Some of those measures may include, depending on the circumstances:

- Restricting the access to its computer systems and physical records to authorised persons and prevent users from accessing information they have no need to access.
- Requiring employees to use unique passwords to gain access to systems.
- Encrypting data sent from other computers to Heritage Corporate's systems during internet transactions.
- Employing firewalls, intrusion detection services and virus scanning tools to prevent unauthorised persons and viruses from entering its systems.

- Providing secure storage for physical records.
- Preventing unauthorised access to Heritage Corporate's offices by providing security keys to authorised persons.
- Contractual protections when storing personal information with the assistance of third party service providers.

### **Website privacy**

Heritage Corporate may obtain personal information:

- when an individual knowingly gives that information when requesting forms or other information on Heritage Corporate's website (under the sub-domain [theheritagegroup.com.au/heritage-corporate/](http://theheritagegroup.com.au/heritage-corporate/)) or contacting Heritage Corporate via its website, including email; and
- by 'cookies' when a person visits Heritage Corporate's website.

A cookie is a piece of information that allows Heritage Corporate's system to identify and interact more effectively with a user's browser. The cookie helps Heritage Corporate to maintain the continuity of the user's browsing session and remember details and preferences on the user's return. Users can configure their web browser software to reject cookies however some parts of the Heritage Corporate website may not have full functionality in that case.

The personal information collected via the website is collected for the following reasons:

- to respond to queries or requests for information;
- to keep a record of dealings with clients;
- to develop a data profile to enable it to tailor services to its clients and to enhance the content of its website; and
- to send notices to clients about financial products and services Heritage Corporate offers.

The Heritage Corporate website may use Google services such as Google Analytics from time to time. For more about how Google collects and processes data, please see Google's privacy policy and their information at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/).

### **Accessing and updating personal information**

Individuals can access and update most of the personal information Heritage Corporate holds about them. If access or updating is restricted or refused, Heritage Corporate will provide the reason why. All requests for access to personal information should be directed to Heritage Corporate's Privacy Officer as set out below. A reasonable charge may apply to gain access to the information.

### **Complaints**

If a client or an employee has a complaint regarding the treatment of any information collected, used or disclosed by Heritage Corporate, all relevant details should be forwarded to Heritage Corporate's Privacy Officer as set out below. Heritage Corporate may need to engage or consult with other parties in order to investigate and deal with the complaint, and will keep records of the complaint and any resolution.

### **Privacy Officer**

You can contact Heritage Corporate's Privacy Officer via one of the means below:

Telephone: 03 9642 5422

Post PO Box 4285, Richmond East VIC 3121

Email [chendra@heritagecorporate.com.au](mailto:chendra@heritagecorporate.com.au)

Heritage Corporate Pty Ltd ACN 629 641 452

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