



LEYDIN FREYER

YOUR TRUSTED PARTNER

Document:	Privacy Policy
Entity:	Leydin Freyer Corp Pty Ltd (ABN 96 639 976 931)
Responsibility:	General Manager
Location:	Level 4, 100 Albert Road, South Melbourne VIC 3205
Date:	2018

Privacy policy overview

Leydin Freyer Corp Pty Ltd (ABN 96 639 976 931) handles your personal information with care and in accordance with the Privacy Act 1988 and the Australian Privacy Principles.

In this privacy policy ('policy') we explain how we collect, store, use and disclose personal information and the steps we take to comply with privacy laws. This policy also explains how you may access and seek correction of the personal information we hold about you and make privacy related enquiries or complaints.

Application of this privacy policy

This privacy policy applies to personal information we collect about our clients and their nominated contacts and representatives (including trustees, company directors and officers, officers of co-operatives and associations, client's spouse and dependents) and to other individuals whose personal information we collect or that our clients or their representatives provide to us in the course of our services. It also applies to applicants for positions with us and our clients, where we provide our clients with recruitment services.

In this policy 'we' or 'us' means Leydin Freyer Corp Pty Ltd ABN 96 639 976 931 and its related entities.

We may also provide you with separate privacy notices when we collect your personal information. These notices may outline additional uses and disclosures not detailed in this policy. If there is any inconsistency between these separate privacy notices and this privacy policy, you should rely on the information in those notices.

This policy does not apply to the personal information we collect and hold about our employees.

If you find any links to other websites on our website, this privacy policy does not apply to them. Always check the privacy policy of any website you access.

Details of personal information we may collect

We will only ask for personal information that is relevant to our relationship with you and if it is reasonably necessary for one or more of our functions or activities. We may ask you for your:

- **Name, address, telephone number, email and other contact details;**
- **Date of birth, gender and marital status;**
- **Financial and investment information including shareholdings, debts or debts owed and bank account details;**

- **Government identifiers including your tax file number;**
- **Superannuation and insurance information;**
- **Occupation and employment details including past employment (in respect of job applicants for positions with us or our clients); and**
- **Your sensitive information such as professional memberships, racial or ethnic origin, criminal record and health information (from job applicants or for certain services including recruitment activities for our clients).**

Collection of personal information

We will usually collect personal information directly from you. For example, we collect personal information directly from you via documents and materials you provide to us, from our conversations with you in person and over the telephone, and from mail and electronic communications with you.

Sometimes we may collect information about you from someone else. For example, from someone acting on your behalf or your representatives (such as financial advisers, accountants, and solicitors), your employer (if they are our client), your insurers or brokers, publicly available sources (such as publications and online profiles), referees, referrers or other intermediaries.

We may also collect personal information about you from our clients in the course of providing services to them.

When you provide us with someone else's personal information you should only do so with their authority or consent or if you are required or authorised by law. You should also refer them to this privacy policy and any separate privacy notices we provide you.

The purposes for which we collect your personal information

We collect, retain, use and disclose your personal information to enable us to provide our services, to respond to your inquiries, assess your employment application and to comply with the law.

Some of the purposes for which we use your personal information are to:

- **provide professional services to you or to other clients;**
- **communicate with you, including responding to your inquiries and feedback;**
- **conduct client satisfaction feedback activities;**
- **conduct administration activities;**
- **manage our conflict of interest and independence obligations;**
- **undertake recruitment activities for us and our clients; and**
- **to comply with legislative and regulatory requirements including under the Corporations Act, the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), and taxation and employment laws.**

We do not sell personal information for marketing purposes to other organisations or allow such companies to do this.

To assist us in providing you these services, we use a range of service providers. We may disclose your personal information to these service providers in the course of providing our services to you. Our service providers include those set out in the table below whose privacy policies are available at the locations set out in the table below. The privacy policies set out how they collect, use and handle your personal information, and contain information about how you may access and seek correction of your personal information, how you may complain about a breach of your privacy, and how they will deal with that complaint.

Service Provider	Privacy Policy location
Sundaram Business Services Ltd	www.sundarambizserv.com

We will ensure that these service providers are obliged to, and will, use your personal information solely for the purpose of assisting us in providing you our services.

By providing your personal information, you agree to its use and disclosure in accordance with this statement.

Your election

You may decide not to provide us with your personal information we ask for. However if you do so, or if you provide us with personal information that is inaccurate or incomplete, we may not be able to respond adequately to your inquiries or provide you with the services you or our other clients require.

Disclosure required by law

We may be required to disclose your personal information by law e.g. under Court Orders or Statutory Notices, or under laws relating to sanctions, anti-money laundering or counter terrorism financing, corporations law, taxation and employment laws under the *Corporations Act*.

How we store your personal information

We hold personal information in both electronic and hardcopy formats. We will take reasonable steps to protect the security of personal information. We have document management and retention policies and processes in place, and we employ physical controls such as swipe card access to our buildings and locked filing units. Our electronic records are protected by a range of security measures, for example, firewalls, passwords, virus scanning software, and data encryption.

Our employees and contractors are obliged to respect the confidentiality of any personal information held and used by us. If other organisations provide support services, we require them to appropriately safeguard their privacy of the information provided to them.

Our Website

We use our best efforts to ensure that information received via our Website remains secured within our systems. Unfortunately, no data transmission over the Internet can be guaranteed to be totally secure.

We use cookies on our Website. A cookie is a packet of information placed on a user's computer by a website for record keeping purposes. If you do not want information collected through the use of cookies, you may be able to delete or reject cookies through your browser settings.

Accessing and correcting your personal information

We take reasonable steps to make sure that your personal information is accurate, complete and up-to-date. You may request access to and correction of your personal information by contacting Leydin Freyer Corp Pty Ltd office by phone or in writing. In normal circumstances, we will give you full access or make the requested corrections to your information however there may be some legal or administrative reasons to deny these requests.

If your request is denied, we will provide you with a reason (if we can). Where we decide not to make a requested correction to your personal information and you disagree, you may ask us to make a note of your requested correction with the information.

How we handle complaints

If you believe we have not complied with our privacy obligations you can submit a complaint to us in writing by either of the following methods:

- **Emailing the General Manager at admin@leydinfreyer.com.au,**
- **Mailing the General Manager at Level 4, 100 Albert Road, South Melbourne, Vic 3205**

We will respond to your complaint as soon as reasonably practicable after receipt of your written complaint. We will need to verify your identity and we may need to ask you for further information.

If you do not agree with our decision or the way we have handled your complaint you can refer your complaint to the Office of the Australian Information Commissioner.

How to contact us

You can contact us about this policy by:

- **Emailing the General Manager at admin@leydinfreyer.com.au**
- **Mailing the General Manager at Level 4, 100 Albert Road, South Melbourne, Vic 3205**
- **Telephoning Leydin Freyer Corp Pty Ltd office +613 9692 7222 and asking to speak to the General Manager**

Updates to this policy

We will update this policy as required to reflect changes to our privacy practices. We encourage you to check our website regularly for updates to our Privacy Policy.

Last update January 2018.