

Privacy policy

Marsh Tincknell Pty Ltd ACN 137 316 815 (Marsh Tincknell) is committed to protecting the privacy of your personal information. This privacy policy explains how Marsh Tincknell manages the personal information that we collect, use and disclose and how to contact us if you have any further queries about our management of your personal information. This privacy policy does not cover personal information collected or held by Marsh Tincknell about its employees.

Marsh Tincknell is required by the *Privacy Act 1988* (Cth) (Privacy Act) to comply with the Australian Privacy Principles (APP's) (subject to the other provisions of the Privacy Act). The APPs regulate the manner in which personal information is handled throughout its life cycle, from collection to use and disclosure, storage, accessibility and disposal. Marsh Tincknell is also required to comply with the *Spam Act 2003* (Cth) (Spam Act) and the *Do Not Call Register Act 2006* (Cth) (Do Not Call Register Act).

What is personal information?

Personal information is information or an opinion, in any form and whether true or not, about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion. Examples include an individual's name (including pseudonyms), address, contact number and email address.

Special provisions apply to the collection of personal information which is sensitive information. Sensitive information includes (for example) information about a person's membership of a professional or trade association.

Collection of personal information by Marsh Tincknell

To the extent required by the Privacy Act:

- Marsh Tincknell will not collect personal information about you unless that information is necessary for one or more of our functions or activities
- Marsh Tincknell will collect personal information only by lawful and fair means and not in an unreasonably intrusive manner

When Marsh Tincknell collects personal information directly from you, we will take reasonable steps at or before the time of collection to ensure that you are aware of certain key matters, such as the purposes for which we are collecting the information, the organisations (or types of organisations) to which we would normally disclose information of that kind, the fact that you are able to access the information and how to contact us (for example, where personal information is collected on a form, we will generally include a written privacy statement on the form which sets out these details).

Marsh Tincknell will collect your personal information directly from you where it is reasonable and practicable to do so. Where Marsh Tincknell collects information about you from a third party, we will still take reasonable steps to ensure that you are made aware of the details set out above.

Use and disclosure of personal information by Marsh Tincknell

If Marsh Tincknell uses or discloses your personal information for a purpose (secondary purpose) other than the main reason for which it was originally collected (primary purpose), to the extent required by the Privacy Act, we will ensure that:

- the secondary purpose is related to the primary purpose of collection (and directly related in the case of sensitive information), and you would reasonably expect that Marsh Tincknell would use or disclose your information in that way;
- you have consented to the use or disclosure of your personal information for the secondary purpose:
 - the use or disclosure is required or authorised by or under law; or
 - the use or disclosure is otherwise permitted by the Privacy Act (for example, as a necessary part of an investigation of suspected unlawful activity)

Why does Marsh Tincknell collect personal information?

Marsh Tincknell collects personal information for a range of purposes, including to:

- ensure you comply with your Taxation responsibilities
- assist in providing you appropriate advice based on your personal circumstances

From time to time, Marsh Tincknell conducts surveys on a range of issues such as marketing surveys or surveys to determine the experience and quality of Marsh Tincknell's services and its systems. These surveys help us to identify and analyse ongoing needs and the quality of our products and services. If you do not wish to participate in these surveys, please let us know (our contact details are provided at the end of this policy).

How might we contact you?

We may contact you in a variety of ways, including by post, email, SMS, telephone call or facsimile.

Spam

We will not send you any commercial electronic messages such as SMSs or emails unless this is permitted by the Spam Act (for example, if we have your express or inferred consent to do so). Any commercial electronic message that we send will identify Marsh Tincknell as the sender and will include our contact details. The message will also provide an unsubscribe facility. If you do not wish to receive commercial electronic messages from us, please let us know (our contact details are provided at the end of this policy).

Do Not Call Register

We will not call you on a number listed on the Do Not Call Register unless this is permitted under the Do Not Call Register Act and related instruments (for example, if we have your express or inferred consent to do so). If you do not wish us to call you on a particular number, please let us know (our contact details are provided at the end of this policy).

When does Marsh Tincknell disclose personal information to third parties?

In performing our functions and activities, we may need to disclose personal information to third parties.

Third parties with whom Marsh Tincknell may share your personal information include, where appropriate:

- Australian Taxation Office
- Bankers, when requested, to assist in finance matters on your behalf
- Financial Planners, when requested, to provide information to assist with Insurances and Financial Planning
- Lawyers, when requested, to assist in a range of legal matters
- Marsh Tincknell's contracted service providers, including:
 - information technology service providers;
 - printers and distributors of direct marketing material; and
 - external business advisers (such as auditors and lawyers)

Data quality and security

To the extent required by the Privacy Act, Marsh Tincknell will take reasonable steps to:

- make sure that the personal information that we collect, use and disclose is accurate, complete and up to date
- protect the personal information that we hold from misuse and loss and from unauthorised access, modification or disclosure
- destroy or permanently de-identify personal information that is no longer needed for any purpose that is permitted by the Privacy Act

Anonymity

Marsh Tincknell will generally provide individuals with the option of not identifying themselves when entering into transactions when it is lawful and practicable to do so.

Use of Commonwealth government identifiers

Marsh Tincknell will not use Commonwealth government identifiers (Identifiers) (such as Medicare numbers) as its own identifier of individuals. We will only use or disclose Identifiers in the circumstances permitted by the Privacy Act.

Transfer of personal information overseas

If Marsh Tincknell transfers your personal information outside Australia, Marsh Tincknell will comply with requirements of the Privacy Act that relate to trans-border data flows.

Access and correction of your personal information

Please contact Marsh Tincknell if you would like to access or correct the personal information that we hold about you. Marsh Tincknell will generally provide you with access to your personal information, and will take reasonable steps to amend any personal information that is incorrect. In some circumstances, Marsh Tincknell may not permit access to your personal information, or may refuse to correct your personal information, in which case we will provide you with reasons for this decision.

Further information

Please contact Marsh Tincknell if you have any queries about the personal information that Marsh Tincknell holds about you or the way we handle that personal information. Marsh Tincknell's contact details for privacy queries are set out below.

Marsh Tincknell Privacy Contact

Attention: Privacy Officer
Level 1, 1454 Logan Road
Mount Gravatt QLD 4122
Ph: +61 7 3422 8000
Fax: +61 7 3422 8080

Complaints

Please contact the Marsh Tincknell privacy contact using the above details if you have any concerns or complaints about the manner in which your personal information has been collected or handled by Marsh Tincknell.