



Privacy Policy

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Approved by: Rhys Thomson, Emma Maratea, Louise Collier, Leo Drynan

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Why your privacy matters to us

This Privacy Policy sets out how and why Rhelm Pty Ltd (ACN 616 964 517) (“**Rhelm**”, “**we**” or “**us**”) collects, stores, uses and discloses your personal information and how you may access personal information about you and seek correction of such information.

We collect a variety of information from users of our services and visitors to our website (www.rhelm.com) and other websites licensed by us in the course of us providing our services to clients, including “mysocialpinpoint”, some of which can be confidential. This document explains the types of information we collect and what we do with that information (among other things).

By visiting our website (or any other website licensed by us for the purposes of our services), using any of our services or otherwise providing us with your personal information (or authorising it to be provided to us by someone else), you agree to your personal information being handled as set out in this Privacy Policy. Rhelm may update this Privacy Policy from time to time so please review it periodically for changes on our website www.rhelm.com.au. Your continued engagement with us, use of our services (including on our website or a licensed website), requesting our assistance or the provision of further personal information to us (directly or via an authorised person) after this Privacy Policy has been revised, constitutes your acceptance of the revised Privacy Policy.

What kind of information do we collect?

Rhelm is a specialist consulting company which offers advisory services in environment & planning, community & place, infrastructure and natural hazards & resilience services.

Rhelm’s clients may require Rhelm to interact with individuals, consumers and/or stakeholders in relation to the subject matter of our services. We may interact in ways that require Rhelm to gather personal information. The amount and type of information that Rhelm gathers depends on the nature of the interaction, and may include names, addresses, contact details, photographs and any other data or information that you might provide.

We collect personal information in a number of ways, including:

- **Consumer-provided information:** When you engage with our services, you may provide, and we may collect, personal information. Examples include when you provide information through our website or a website licensed by us (for example “My Social Pinpoint”); when you contact us for service-related requests and provide information related to those requests; and all other information provided to us to enable to provide you with our services, whether via a website form, an email message, social network communication, telephone or other direct or indirect forms of communication.



- **Automatically-collected information:** When individuals use our services, we may automatically record certain information from your device (such as your computer, phone, tablet or voice-enabled device) by using various types of technology, including cookies, pixels or web beacons. We also may use these technologies to collect information regarding individuals' interaction with our service, e.g., such as whether the individual opens, clicks on, or forwards an email message.
- **Information from other sources.** We may obtain information, including personal information, from third parties and other publicly available sources. If we combine or associate information from other sources with personal information that we collect through our services, we will treat the combined information as personal information in accordance with this Privacy Policy.

You can choose to refuse to supply personal information, with the caveat that we may not be able to provide our services or assistance to you or on your behalf, and it may prevent us from engaging in activities necessary for us to perform our services. Where relevant, you consent to Rhelm using any personal information you might provide for the purpose of our functions and/or activities described above.

In certain circumstances we may be required or permitted by law, court or tribunal order to collect certain personal information about you.

Unsolicited information

If we receive personal information that we have not requested (unsolicited personal information) we will review and consider that information to determine whether it is reasonably necessary for, or directly related to, one or more of Rhelm's functions, activities or purposes as set out below. Where we consider that unsolicited personal information not to be so necessary or related we will delete or destroy it as soon as practicable but only if it is lawful and reasonable to do so, or ensure that the information is de-identified.

Storage and security

We will take all reasonable steps to protect your personal information, and you will be able to access your personal information held by us at any time (subject to service outages) to keep it updated, on request. We store your personal information in a secure database where only authorised personnel have access to such information for the purpose of providing you with our services.

Although we aim to create a safe, secure environment for the storage of personal information, we cannot guarantee that unauthorised parties will not gain access. We will not have any liability arising from any unauthorised access to your personal information.

How do we use your personal information?

Subject to this Privacy Policy, we may use your personal information to:

- provide our advisory consulting services;
- communication and engagement with third parties and other stakeholders regarding voting shares;
- send you service communications, including surveys and information about updates, and to respond to individuals' queries;



- create or distribute notices, correspondence or material that is relevant to you;
- conduct verification, checking credentials, monitoring and reporting as required under any applicable laws;
- quality assurance and training purposes;
- allow use of personal information in a controlled manner by third parties with whom we have a commercial relationship, to distribute information relevant to you or to provide you with relevant services; and
- any other uses identified at the time of collecting your personal information.

You consent to us using and disclosing your personal information in any manner that could reasonably be contemplated by this Privacy Policy.

When might we disclose your personal information?

Any personal information collected by us may also be disclosed, if appropriate, to other entities in order to facilitate the purpose for which the information was collected. Such entities generally include:

- our clients for whom we are providing our services;
- third party 'partners' with whom Rhelm has a commercial relationship in order deliver our services or to make available products or opportunities provided by third party 'partners' relevant or likely to be of interest to you engaging with Rhelm.
- where applicable, to third party service providers for the purpose of enabling them to provide a service on our behalf such as (but not limited to) payroll, superannuation administration, IT service providers, data storage, web-hosting and server providers, and debt collectors.
- any related entity of Rhelm;
- any applicable or relevant regulator or third party for the purpose of legislative or contractual compliance and/or reporting; or
- other entities if you have given your express consent.

From time to time, these parties may reside outside Australia. Our contracts with these parties generally include an obligation for them to comply with Australian privacy law and this Privacy Policy. However you acknowledge that, by agreeing to the disclosure of your personal information to these entities outside of Australia, we will no longer be required to take reasonable steps to ensure the recipient's compliance with the Australian privacy law in relation to your personal information and we will not be liable to you for any breach of the Australian privacy law by these overseas recipients. On this basis, you consent to such disclosure.

Does Rhelm use personal information for direct marketing?

Only where applicable, from time to time we may use the personal information we collect from you to identify particular Rhelm services that we believe may be of interest to you. We may then contact you to let you know about these services and how they may benefit you. We will generally only do this with your prior consent (where practical) and we will always give you a choice to opt out of receiving such information in future. Direct Marketing from Rhelm generally takes the form of an Electronic marketing email.



Electronic marketing: Where we use your personal information to send you marketing information by email, SMS, MMS or other electronic means we may do so with your express or implied consent. You may give us your express consent by, for example, ticking a box on an electronic or signing in paper form where we seek your permission to send you electronic or other marketing information. Consent may be implied from our existing business relationship or where you have a reasonable expectation of receiving an electronic marketing communication. Examples of marketing information includes reports on the industry and news on Rhelm legal entities activities and events around the world.

Every directly addressed marketing contact sent or made by Rhelm will include a means by which customers may unsubscribe (or opt out) of receiving further marketing information. Additionally, you may instruct us at any time to remove any previous consent you provided to receive marketing communications from us. Requests should be directed to us via the channels provided under 'Contact us' below.

Links to third party websites

Our website or communications from us, may contain links to the websites of other entities. If you click on such links, you will be transferred to the website of these entities. Rhelm has no control over, and is not responsible for, the privacy practices of these entities. You should read the privacy policy of these entities to find out how they handle your personal information when you visit their websites.

Accessing your personal information held by Rhelm

You may access personal information we otherwise hold about you. Access to your personal information may be denied on certain grounds including, for example: it is unlawful; it may have an unreasonable impact upon the privacy of other individuals; or your request is frivolous or vexatious. If we deny you access we will provide our reason for doing so at the time of your request.

If you wish to access the personal information we hold about you or request correction of it, you should contact the Privacy Officer on the details below who will respond to your request within a reasonable period after the request is made.

While we do not charge you for a request for accessing your personal information you should be aware that we may charge a reasonable fee (which will be notified to you once you make a request) for time and cost in the following circumstances:

- if an extended amount of time is required to collate and prepare material for you; and
- if you wish to have your files photocopied for you.

How can you correct and update your information?

We take reasonable steps to ensure that the personal information we hold about you is accurate, complete and up-to-date. However, we also rely on you to advise us of any changes to your personal information. You may review, edit, correct or delete any personal information you submit to us at any time.

Please contact us using the contact details below or on the relevant section of the website as soon as possible if there are any changes to your personal information or if you believe the personal



information we hold about you is not accurate, complete or up-to-date so that we can update your file accordingly.

Privacy complaints

If you believe that we have breached your privacy rights in any way, or you would like to discuss any issues about our privacy policy please contact our Privacy Officer on the details below.

If you wish to make a complaint about a breach of this Privacy Policy or the *Privacy Act 1988* (Cth) you can contact us using the contact details below. You will need to provide us with sufficient details regarding your complaint together with any supporting evidence. The Privacy Officer will investigate the issue and determine the steps (if any) that we will undertake to resolve your complaint. We will contact you if we require any additional information from you and will notify you in writing of the outcome of the investigation.

If you are not satisfied with our determination, you can contact us to discuss your concerns or complain to the Australian Privacy Commissioner via www.oaic.gov.au.

Contact us

Please contact us at our offices via the contact details provided below if you want to:

- obtain further information about the way we manage your personal information;
- access your personal information held by us;
- raise a concern or make a complaint regarding how we collect or handle your personal information;
- correct or update your personal information held by us; or
- unsubscribe from any Rhelm mailing list or have any questions or complaints regarding unsolicited electronic communications that you may have received or are concerned about.

Please contact us immediately if you become aware of any unauthorised use of your account by anyone else or any other breach of security.

Contact Details:

Rhelm Pty Ltd
ACN 616 964 517
50 Yeo Street,
Neutral Bay NSW 2089
Email: contact@rhelm.com.au
Phone: +612 9098 6998

Need more information on privacy?

For more general information regarding privacy in Australia, visit the website of the Office of the Australian Information Commissioner (www.oaic.gov.au).