

PRIVACY & DATA PROTECTION

Statement of Policy

creativeterritory
PASSION | INTEGRITY | RESILIENCE

Privacy & Data Protection Policy

Statement of commitment

Creative Territory Pty Ltd (“Creative Territory”) is committed to protecting the privacy and personal data of all individuals with whom it engages, including employees, contractors, clients, community stakeholders, and third parties. As a stakeholder engagement consultancy operating within the resources sector, Creative Territory recognises its obligations under applicable privacy legislation and international data protection frameworks.

This commitment includes compliance with:

- The Privacy Act 1988 (Commonwealth)
- The Australian Privacy Principles (APPs)
- The Northern Territory Information Act 2002 (where applicable)
- The General Data Protection Regulation (GDPR) (EU/UK) where international operations involve EU/UK data subjects
- The United Nations Guiding Principles on Business and Human Rights (UNGPs), particularly in relation to the right to privacy and protection of personal information.

Creative Territory acknowledges that its work often involves sensitive personal, cultural., and community-derived information. Accordingly, the company adopts a precautionary and respectful approach to data collection, handling., and disclosure.

Scope and applicability

This policy applies to all employees, directors, contractors, and consultants of Creative Territory Pty Ltd, as well as third-party service providers who process personal data on behalf of the company. It governs the collection, use, storage, disclosure and disposal of personal and sensitive information in all operational contexts, including:

- Internal employment and HR processes
- Stakeholder engagement and consultation activities
- Indigenous partnerships and cultural heritage documentation
- Client project delivery and reporting
- International collaborations and cross-border data transfers.

This policy applies to all forms of data, including physical records, electronic files, audio-visual materials and cloud-based platforms. Where local laws or international standards impose stricter requirements than Australian law, the higher standard shall apply unless otherwise directed by legal counsel.

Types of information collected

Creative Territory may collect the following categories of personal information:

- Contact details (e.g., name, address, phone number, email)
- Employment-related data (e.g., CVs, contracts, performance records)
- Stakeholder and community feedback
- Cultural and heritage information (subject to consent and protocols)

- Health and safety data (e.g., incident reports, medical disclosures)
- Financial and contractual information
- Digital identifiers (e.g., IP addresses, device data).

Sensitive information, including racial or ethnic origin, religious beliefs, health data and Indigenous cultural knowledge, shall only be collected with informed consent and in accordance with applicable laws and ethical standards.

Purpose of collection and use

Personal information shall be collected and used for purposes directly related to Creative Territory's business activities, including:

- Employment administration and compliance
- Stakeholder engagement and reporting
- Project planning, delivery and evaluation
- Risk management and legal compliance
- Communication and relationship management
- Cultural heritage protection and documentation.

Creative Territory shall not use personal information for secondary purposes unless authorised by law or with the individual's explicit consent.

Consent and notification

Creative Territory shall obtain informed consent prior to collecting personal or sensitive information, except where collection is authorised or required by law. Individuals shall be notified of:

- The purpose of collection
- The intended use and disclosure
- Their rights to access and correct information
- Any cross-border data transfers.

Where information is collected from third parties, Creative Territory shall take reasonable steps to ensure the individual is aware of the collection.

Data security and storage

Creative Territory shall implement reasonable physical, technical, and administrative safeguards to protect personal information from unauthorised access, modification, disclosure, or loss. This includes:

- Secure storage of physical records
- Password-protected digital systems
- Access controls and user authentication
- Regular data backups and encryption
- Secure disposal of obsolete records.

Where data is stored or processed by third-party providers, Creative Territory shall ensure contractual safeguards are in place to maintain compliance with this policy.

Disclosure and third-party access

Personal information may be disclosed to:

- Clients and project partners (subject to confidentiality agreements)
- Regulatory authorities (where required by law)
- Legal and professional advisers
- Technology and data service providers.

Creative Territory shall not sell or trade personal information. Any disclosure shall be limited to what is necessary and proportionate to the purpose.

Cross-border data transfers

Where personal information is transferred outside Australia, Creative Territory shall ensure that:

- The recipient is subject to laws or contractual obligations that offer comparable protection
- The individual has provided informed consent (where required)
- The transfer complies with the *Privacy Act 1988 (Commonwealth)* and, where applicable, the *GDPR*.

Special care shall be taken when transferring Indigenous cultural or community-derived data across jurisdictions.

Access, correction and complaints

Individuals have the right to:

- Request access to their personal information
- Seek correction of inaccurate or outdated data
- Lodge complaints regarding breaches of privacy

Requests and complaints shall be directed to the Director of Creative Territory Pty Ltd and responded to within a reasonable timeframe. Where complaints cannot be resolved internally, individuals may escalate to the Office of the Australian Information Commissioner (OAIC) or relevant authority.

Governance and review

Responsibility for implementation of this policy rests with the Director of Creative Territory Pty Ltd. The policy shall be reviewed annually or as required to reflect changes in law, technology or operational context.

Breaches of this policy may result in disciplinary action, termination of engagement, or legal liability.