



## **Privacy Policy**

## DOCUMENT CONTROL MANAGEMENT

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## 1. Purpose

### 1.1 Background

NorthPole IT Consulting Pty Ltd, its related bodies (NorthPole, we or us) recognises that your privacy is important. This document is our Privacy Policy and it tells you how we collect and manage your personal information (including the personal information NorthPole will collect from you when you access the NorthPole website) and how we will use that information.

We respect your rights to privacy under the *Privacy Act 1988* (Cth) (Privacy Act) and we comply with all the Privacy Act's requirements, including those incorporated by virtue of the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* (Cth), in respect of the collection, management and disclosure of your personal information.

### 1.2 What is the purpose of Privacy Policy?

The purpose of this Privacy Policy is to:

- Clearly communicate our personal information handling practices
- Enhance the transparency of our operations
- Give individuals a better and more complete understanding of the sort of personal information that we hold, and the way we handle that information.

The Privacy Act sets the minimum standards we have to meet when handling personal information, as a self-insured Licensee. "Personal information" is defined in the Privacy Act as:

*"Information or an opinion about an identified individual, or an individual who is reasonably identifiable:*

*a) whether the information or opinion is true or not; and*

*b) whether the information or opinion is recorded in a material form or not."*

The Privacy Act contains 13 Australian Privacy Principles (APPs). The APPs:

- Set out legally binding standards for handling personal information

- Regulate how we collect, store, use and disclose personal information
- Allow people to access the information that we keep about them
- Allow people to correct or update their information.

This Privacy Policy is published on NorthPole's website at <https://northpoleconsulting.com.au/privacy-policy>. NorthPole can also provide you with a copy of this Privacy Policy in another form, if it is reasonable to do so. If you would like a copy of this Privacy Policy in another form, please contact the Privacy Officer using the contact details below.

## **2. Scope and Application**

The Privacy Policy applies to all employees of NorthPole in collecting, holding, accessing and correcting personal information and sensitive information on our behalf.

This policy is relevant to any individual who discloses personal information to NorthPole.

## **3. Policy**

### **3.1 What is your personal information?**

In this Privacy Policy, 'personal information' refers to the definition provided by the Privacy Act. Broadly, it includes any details that can be used to identify you personally. This may encompass your name, address, phone number, email address, and your profession or occupation. Any information we collect that directly identifies you, or from which you can be reasonably identified, is treated as personal information.

### **3.2 What information we collect and hold?**

We may collect the following types of personal information about you:

- Name;
- Mailing or street address;

- Email address;
- Telephone number;
- Profession, occupation or job title;
- Employment history;
- Educational history;
- Details of the services you have acquired from us or which you have enquired about, together with any additional information necessary to deliver those services and to respond to your enquiries;
- Any additional information relating to you that you provide to us directly through our website or indirectly through use of our website or online presence, through our representatives or otherwise;
- Where you are involved in the provision of services to NorthPole, any additional information relating to you provided to NorthPole to assess your suitability, qualifications and competency; and
- Information that you provide to us through customer surveys or visits by our representatives from time to time.

We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users use our website.

### **3.3 How we collect your information?**

We collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect in ways including:

- Through your access and use of our website
- Email;
- Telephone;
- Online forms;

- During conversations between you and our representatives.

We may also collect personal information from third parties including:

- Your current or previous employer;
- Personal and professional references;
- Cloud-based services;
- Web filtering services.

### **3.4 What happens if we can't collect your personal information?**

If you choose not to provide the personal information requested, the following consequences may occur:

- We may be unable to deliver our services to you at the desired level—or at all;
- We may be unable to keep you informed about services or special promotions that may interest you;
- We may not be able to customise your website experience, which could affect its usefulness or overall enjoyment.

### **3.5 For what purposes do we collect, hold, use and disclose your personal information?**

We collect personal information about you so that we can perform our business activities and functions. We collect, hold, use and disclose your personal information for the following purposes:

- To provide our services to you and to send communications requested by you;
- To answer enquiries and provide information or advice about existing and new services;
- To contact you regarding your feedback and to provide you with our printed materials;
- To develop new offers, products and services and to help us improve our business;
- To ensure we comply with all applicable laws;

- To provide you with access to protected areas of our website;
- To assess the performance of the website and to improve the operation of the website;
- To conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers and other third parties;
- For the administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes of us and our related bodies corporate, contractors or service providers;
- To provide your updated personal information to our related bodies corporate, contractors or service providers;
- To update our records and keep your contact details up to date;
- To process and respond to any complaint made by you; and
- To comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority.

### **3.6 Our website**

Our Privacy Policy also applies to our website at [www.northpoleconsulting.com.au](http://www.northpoleconsulting.com.au)

#### **3.6.1 Cookies**

When you visit our website, we may place a small file called a 'cookie' on your device. This file contains a unique ID that allows us to recognize your device and welcome you back without requiring repeated registration. Cookies help us track the services you view, so—with your consent—we can share relevant updates or offers.

We also use cookies to analyse website traffic, identify the most visited sections, and understand user behaviour in aggregate. This helps us enhance our online services. Please note that our cookies do not collect personal information.



If you prefer not to receive cookies, you can adjust your browser settings to block them. In addition, we may log IP addresses (the digital addresses of internet-connected devices) to monitor usage trends, manage the site, and gather general demographic insights.

### **3.6.2 Security**

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. There is a risk that data may be intercepted during transmission. Therefore, any personal or other information you choose to share with us online is done so at your own risk.

### **3.7 Who do we disclose your information to?**

We may disclose your personal information to:

- Our employees, related bodies corporate, contractors or service providers for the purposes of operation of our website or our business, fulfilling requests by you, and to otherwise provide services to you.
- Our customers, particularly those with security requirements;
- Other third parties appointed by NorthPole (for example, the distributors of our hardware materials) who may require access to personal information in order to perform our services and our business operations;
- Suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes; and
- Any organisation for any authorised purpose with your express consent.

We may combine or share any information that we collect from you with information collected by any of our related bodies corporate (within Australia).

### **3.8 Marketing Communications**

We may send you direct marketing communications about our services that we believe may be of interest to you. These communications may be delivered via mail, SMS, or email, in compliance with applicable marketing laws, including the Spam Act 2003 (Cth). If you have a preferred method of communication, we will make reasonable efforts to use that method whenever possible.

You may opt out of receiving marketing communications at any time by contacting us (see contact details below) or by using the unsubscribe options provided in our messages. Once we receive your request, we will remove your details from our marketing list.

### **3.9 Do we disclose your personal information to anyone outside Australia?**

We may disclose personal information to our related bodies corporate and third-party suppliers and service providers located overseas for some of the purposes listed above.

We take all reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

We may disclose your personal information to entities located outside of Australia, including the following:

- Our related bodies corporate, located across the South-Asia region;
- Our data hosting and other IT service providers, located in various locations throughout the world;
- and
- Other third parties located throughout the world.

### **3.10 Security and data quality**

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure.

We may hold your information in either electronic or hard copy form. Personal information is destroyed or de-identified when no longer needed or when we are no longer required by law to retain it (whichever is the later).

### **3.11 How can you access and correct your personal information?**

You may request access to any personal information we hold about you at any time by contacting us (see the details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We may charge you a reasonable fee to cover our administrative and other reasonable costs in providing the information to you. We will not charge for simply making the request and will not charge for making any corrections to your personal information.

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment, then we will add a note to the personal information stating that you disagree with it.

### **3.12 What is the process for complaining about a breach of privacy?**

If you believe that your privacy has been breached, please contact us using the contact information below and provide details of the incident so that we can investigate it. We will treat your complaint confidentially, investigate your complaint and aim to ensure that we contact you and your complaint is resolved within a reasonable time (and in any event within the time required by the Privacy Act, if applicable).

If you are unhappy with the way that we are using your personal data, or if you are not satisfied with our response to a complaint, you may lodge a complaint with the Office of the Australian Information Commissioner (to the extent that the *Privacy Act 1988* (Cth) applies) or if the GDPR applies, with a Data Protection Authority.

### **3.13 Contacting us**

If you have any questions about this Privacy Policy, or if you have concerns or wish to make a complaint about how your privacy has been handled or a possible breach, please contact us via the 'Contact Us' page on our website (<https://northpoleconsulting.com.au/contact-us>), or reach out directly to our Privacy Officer using the contact details provided below.

You can contact our Privacy Officer via:

Post: Privacy Officer, NorthPole IT Consulting, Level 8/488 Bourke Street, Melbourne VIC 3000

Tel: 03 7018 1899

Email: [privacy@northpoleconsulting.com.au](mailto:privacy@northpoleconsulting.com.au)

### **3.14 Data Breach Notification**

The Notifiable Data Breach (NDB) Scheme contained in Part IIIC of the Privacy Act requires certain entities to notify individuals and the Office of the Australian Information Commissioner (OAIC) about data breaches that are likely to cause serious harm.

NorthPole accepts its obligation to keep personal information safe and is open and transparent in how data is handled. In the event that personal data systems are breached, data is misused or lost, then NorthPole will take all reasonable and practicable means to contact individuals whose personal information is involved. We will advise such individuals of the extent of the data breach (if known) and advise individuals of the most appropriate means of regaining control of their information, in an effort to limit the personal impact of the breach. If appropriate, NorthPole will also report any breach of data to the OAIC.

### **3.15 Breaches of this Policy**

The breach of this policy by an employee, director or officer of NorthPole may lead to disciplinary action being taken in accordance with our disciplinary procedure. Serious breaches may be regarded as gross misconduct.

All employees, directors and officers of NorthPole will be expected to cooperate fully in any investigation into suspected breaches of this policy or any related processes or procedures.

If an issue is identified with a supplier, we will work with them to prepare a corrective action plan and resolve all violations within an agreed upon time period. We reserve the right to terminate our relationship with individuals and organisations in our supply chain if they breach this policy.

If any part of this policy is unclear, clarification should be sought from the Privacy Officer.

### 3.16 Changes to this Policy

We may update this Privacy Policy periodically to reflect changes in laws, technology, or our functions, operations, and practices. The most current version will be published on our website and will take effect from the date it is posted.

## 4. Definitions

Term	Definition
Australian Privacy Principles (APPs)	Means the principles that set out standards, rights and obligations in relation to handling, holding, accessing and correcting personal information as contained in Schedule 1 of the <i>Privacy Act 1988</i> (Cth).
Consent	Agreement which must be freely given, specific, informed and be an unambiguous indication of the individual's wishes by which they, by a statement or by a clear positive action, signify agreement to the processing of personal information relating to them.
Data breach	Occurs when personal information we hold is subject to unauthorised access or disclosure, or is lost. Examples include: <ul style="list-style-type: none"> <li>• <i>Malicious breach</i>, e.g. someone hacking into NorthPole's computer system or unauthorised access to databases in the work</li> </ul>

	<p>place, such as an employee browsing sensitive customer records without a legitimate purpose;</p> <ul style="list-style-type: none"> <li>• <i>Accidental loss</i>, e.g. IT equipment/hard copy documents left on public transport by an employee; and</li> <li>• <i>Negligent disclosure</i>, e.g. an organisation, whether intentionally or unintentionally, makes personal information accessible; or visible to others outside the organisation and releases the information from its effective control in a way not permitted by the Privacy Act, such as an employee accidentally publishing a confidential data file with personal information of one or more individuals on the internet.</li> </ul>
Data controller	The person or organisation that determines when, why and how to process personal data in line with the GDPR. NorthPole is the data controller for the purposes of the GDPR.
Data Protection Officer	The person required to be appointed in specific circumstances under the GDPR. Our Privacy Officer is the Data Protection Officer for the purposes of the GDPR.
Eligible data breach	Means a breach of personal data security that is likely to result in serious harm to any of the individuals to whom the data relates, and NorthPole has been unable to prevent the likely risk of serious harm with remedial action
Employee	NorthPole employs persons in a variety of capacities and therefore the term “employee” is to be given a broad definition. Employees can include a director, officer, employee, contractor or agent of NorthPole.
Health information	Information or opinion about a person’s physical, mental or psychological health or disability, that is also personal information

	– whether in writing or not. This includes information or opinion about a person’s health status and medical history, immunisation status and allergies, as well as counselling records.
Loss	Refers to the accidental or inadvertent loss of personal information held by NorthPole, in circumstances where it is likely to result in unauthorised access or disclosure.
Notifiable Data Breach Scheme	Means established requirements for entities to notify individuals and the Australian Information Commissioner of eligible data breaches, as per the <i>Privacy Act 1988</i> (Cth).
Office of the Australian Information Commissioner (OAIC)	The OAIC is the independent national regulator for privacy and freedom of information.
Personal information or data	Information or opinion, whether true or not, about a person whose identity is apparent, or can reasonably be ascertained, from the information or opinion – that is recorded in any form. For example, a person’s name, address, phone number and date of birth (age). De-identified information about employees can also be personal information.
Personal data	As defined under the GDPR, means any information relating to an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, psychological, genetic, mental, economic, cultural or social identity of that natural person.



Privacy Officer	Means the person appointed by NorthPole from time-to-time to manage all inquiries and complaints arising under this policy. The Privacy Officer may delegate the management of any or all of the inquiries and complaints arising under this Policy to the Privacy Coordinator.
Processing or Process	Means any activity that involves the use of personal information. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transmitting or transferring personal information to third parties.
Serious harm	“Serious harm” to an individual may include physical, psychological, emotional, financial or reputational harm. Assessment of whether harm is serious will depend on the likelihood of the harm eventuating for individuals whose personal information was part of the data breach and the consequences of the harm.
Unauthorised access/disclosure	Occurs if NorthPole, whether intentionally or unintentionally, makes personal information accessible or visible to others outside the organisation and releases that information from its effective control in a way that is not permitted by the <i>Privacy Act 1988</i> (Cth). This includes an unauthorised disclosure by an employee of the company.
we (us, our, ours)	NorthPole
you (your, yours)	Any individual who discloses personal information to NorthPole.



## 5. Responsibilities

### 5.1 Policy Management

The Board of Directors has overall responsibility for this policy and in ensuring that we comply with all our privacy obligations.

Approval of the Policy is vested with the Board.

Reviews of the Policy are the responsibility of the Privacy Officer and will be conducted annually. This is to ensure that the policy remains consistent with all relevant legislative requirements.

### 5.2 Policy Implementation

The Chief Executive Officer (CEO) will have the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and procedures are in place, and amended as appropriate, to ensure it can operate effectively.

The Privacy Officer is responsible for:

- Conducting regular staff training on our obligations under the APPs, including correct policies and processes for handling personal information;
- Handling any complaints or questions as they arise under this policy;
- Actioning any reasonable requests for personal information;
- Maintaining records of the personal information we hold;
- Handling any internal privacy issues; and
- Respond to any data breaches that occur.

All employees have an obligation to implement the APPs established by the Privacy Act and any similar legislation in their day-to-day practices by complying with such laws and their obligations under this policy in the course of collecting, managing, using, disclosing and securing Personal Information and data.

## 6. Procedure

The Data Breach Procedure provides additional detail to give practical effect to aspects of the Privacy Policy.



## 7. References

### Legislation

- Privacy Act 1988 (Cth)
- Privacy Amendment (Notifiable Data Breaches) Act 2017 (Cth)
- Spam Act 2003 (Cth)
- Regulation EU (2016/679) – General Data Protection Regulation

### Other documentation

- n/a

