

Privacy Policy

1. Protecting your Privacy

This Privacy Policy applies to all the products and services offered by Leslie Group of Services Pty Limited ACN 114 140 251 trading as Integrated Governance and ClubGov (we, us, our) and contains important information about the type of Personal Information (PI) we collect, the purposes for which it is used, how it is managed, to whom we disclose it and what measures we take to comply with privacy laws in respect of our websites and our contact centres (contact centre).

This Privacy Policy is governed by the Privacy Act 1988 (Cth) (Privacy Act) and the Privacy Principles contained therein. We are bound by the Privacy Act and are committed to complying with the Privacy Principles. The privacy of your PI is very important to us.

We may make changes to this Privacy Policy from time to time for any reason. We will publish changes to this Privacy Policy on our websites.

It is important that you read and understand this Privacy Policy.

2. Collection of Information

2.2 Why we collect personal information

Generally we collect your PI to provide you with products and services and to administer our relationship with you. We also collect PI for marketing purposes and to provide you with information about events, products and services (both our own and those of other companies) that may be of interest to you, to improve the services we provide and to run various competitions. No information collected is transferred or sold to third parties for the use of promotional marketing.

Other non-personally identifiable information such as server logs are used to maintain our services and to provide broad statistical analysis of our website performance.

We will only collect sensitive information where it is necessary for the purposes of determining risk or providing you with a specific product or service. If not required, we will not collect sensitive information. Any such sensitive information is collected in accordance with the Privacy Principles.

2.3 What personal Information we collect and hold

2.3.1 Personal information

We may collect various types of PI including but not limited to your name, address, email, phone number, age, payment details, gender, interests or other information relevant to promotions or activities. We may also collect information including but not limited to your position, company or the organisation you work for and any other service-specific information, including technical and business specifications.

2.3.2 Sensitive information

We rarely ask for sensitive information, but may do so occasionally, for example, as part of a competition, promotion or survey if it is reasonably necessary for, or directly related to one or more of our functions or activities. We will not require you to provide sensitive information unless you have consented to providing such information (such consent will be deemed when you submit such information to us) or the collection of the information is specifically authorised or required by law.

2.3.3 Information collected online

Our websites, email systems and other technology record information about all site visits or messages sent to us. The information is recorded automatically and includes:

- The IP Address of your computer
- The date and time
- The information you requested
- Any information you sent us (such as an email)
- The referring page from where you initially entered our website
- The session identifier of your last visit to our website
- Location data.

For authenticated users of our web services, we also record your login details in order to provide you with the service.

2.4 How we collect personal information

2.4.1 Directly

We primarily collect PI directly from you when you interact with us, for example when:

- You click the submit button on any web-based form
- You provide your details to us or our staff through third-party networking websites such as LinkedIn and Facebook
- You providing your business card or business details via email or verbal consent to us or our staff
- You attend an event or activity we organise, sponsor or are otherwise affiliated with
- You submit an entry into a competition or trade promotion
- You post an entry on any of our websites (including social media assets and platforms)
- You purchase products or services from us
- You call us.

We may also obtain details about you from marketing databases or other sources that are publicly available such as websites, journals, legal directories and phone books.

2.4.2 Third Parties

Where possible, we collect personal information directly from you. However, in some circumstances we may also collect personal information from other sources. For example, where one of your friends, colleagues, peers or business relationships indicates to us that one of our services or products may be of interest to you. If we do collect PI in this manner, we will endeavour to make you aware of who we are, the fact and manner of collection of this information and this Privacy Policy. We will ask the third party to tell you that they have provided us with your PI and direct you to a copy of this Privacy Policy.

2.4.3 Information collected online

We collect information about visitors using our online resources. Any information collected is used to provide our products and services and to identify online behavioural patterns. Our online resources include, but are not limited to websites and mobile applications “apps”. Information collected by these resources may collect the following information:

- Server address/IP address
- Date and time of visit to our site
- Pages visited
- Documents downloaded
- The site you visited prior to visiting our website
- The browser you are using to access our resources
- If you have visited our website before
- Tracking user preferences.

We may also collect anonymous information through the use of cookies on our website. Cookies are pieces of information that are stored on your computer's hard disk. Most web-browsers are set to accept cookies but you can set your web-browser to refuse cookies. Cookies themselves do not identify users personally but they do allow the tracking of an individual's use of a website. Most of our online resources use sessions and/or cookies. If you wish, you can configure your browser so it does not accept cookies, but this may affect the functionality of the website.

3. Use and Disclosure

3.1 Use

By submitting your PI to us you consent to us using your PI in the following ways and for the following purposes:

- to provide you with our products or services
- to administer our relationship with you
- to facilitate the running of and your participation in trade promotions and other competitions
- to monitor activity on our websites,
- to compile subscriber databases and profiles to enable us to market goods and services more accurately
- for internal administrative purposes, such as procedural assessments, risk management, staff training, accounting, billing, product and service reviews
- to identify and inform you about other products or services that may be of interest to you
- to market, improve and add to our products and services including our websites and email campaigns
- where there is reason to suspect unlawful activity has been engaged in
- where required or authorised by law or
- where required by an enforcement body.

If you do not wish to receive marketing or other communications from us, please contact us on the details below so that we can update your preferences.

If you provide us with your mobile telephone number, email address, IM address or other such personal information, you authorise us to send you promotional messages related to our products and services and the products and services that we promote. Such messages will be accompanied by a functional unsubscribe facility.

3.1.1 Direct Marketing Opt Out

If you do not want to receive any marketing offers, you can choose to opt out of our marketing activities. To opt out, you can either use the unsubscribe function from our emails, SMS, MMS or IM or contact us using the Contact Details below.

3.1.2 All Communications Opt Out

If you do not want to receive any communications at all, please contact us using the Contact Details below to discuss options.

3.2 Disclosure

We may disclose PI across Leslie Group of Services Pty Limited and our related bodies corporate (in accordance with this Privacy Policy). We may also provide PI to third parties engaged by us to provide functions on our behalf such as storing and managing databases, processing credit card information, mailouts, debt collection, and marketing research and advertising.

No information collected is transferred or sold to third parties for the use of promotional marketing.

We may disclose PI to unrelated third parties (for example, our professional advisers and government authorities or agencies) where that disclosure is reasonably required to obtain advice, prepare legal proceedings, investigate suspected improper conduct or wrong doing, to assist a lawful authority in the discharge of its duties and/or by law.

Where we hold promotions in conjunction with other companies, we will offer you the opportunity to be contacted by our promotions partner(s). We will not provide your PI to the promotions partner(s) unless you have opted in to having such PI passed on. To better protect your privacy, we impose strict requirements of security and confidentiality on all third parties as to how they handle your PI. Notwithstanding this, we cannot be held responsible for any misuse or unauthorised disclosure of your PI by these third parties.

3.2.1 Overseas transfers of information

We are not likely to disclose your PI to overseas recipients. In any case, we will not send your PI outside of Australia unless we obtain agreement from the recipient to protect your information in accordance with Australian privacy laws and to abide by the terms of this policy.

4. Data Quality

We take reasonable steps to ensure that the PI we collect, use or disclose is accurate, complete and up-to-date. If your PI is incorrect or changes, please contact us on the details below so that we can update your PI and continue providing you with our services.

5. Data Security

Your PI is stored in a number of secure computer storage facilities and paper based files, and in other records. We have taken precautions to ensure that your PI is protected from misuse, loss and unauthorised access, modification or disclosure. Once we no longer need your PI, we take reasonable steps to destroy or de-identify your PI.

6. Openness

If you have any questions whatsoever on our handling of your PI or the kind of PI we hold about you please contact us on the details below and we will endeavour to assist you with your request.

7. Access and Correction

You generally have the right to access your personal information and we will provide you with a copy of any personal information we hold on request. The APPs set out some circumstances in which we are not required to provide you with such access. If you ask for your PI and any of these circumstances apply, we may, if reasonable, give you access to the PI in a way that meets our needs and yours, or give you access through a mutually agreed intermediary.

We may charge a fee to provide this information if it involves over one hour to prepare.

8. Identifiers

We use ABNs for all businesses that we provide our products and services. This information is used to conduct business checks on your organisation. This information is stored offline, inaccessible from the internet.

9. Dealing with us anonymously or using a pseudonym

Where possible, you have the option of interacting with us anonymously or pseudonymously. Whilst you are entitled to interact with us anonymously or by using a pseudonym, we will need to know who you are in order to provide you with our products and deliver services.

10. Complaints and Contact Us

If you have a complaint in relation to the collection and handling of your personal information, please contact our Privacy Officer. We will review all complaints received and the Privacy Officer will respond to the complainant. If you have any other queries about this Privacy Policy, please contact our Privacy Officer by email to integrated@integratedgovernance.com.au or call 1300 76 22 38.