

BATES SMART PRIVACY POLICY

Our privacy commitment

Bates Smart Architects (**Bates Smart**) is committed to respecting and properly protecting the privacy of any personal information we receive from you.

In this policy, we use the terms “us,” “we” and “our” to refer to Bates Smart.

Bates Smart has implemented practices and procedures to:

- ensure compliance with relevant laws, regulations and industry standards including but not limited to the Australian Privacy Principles (**APPs**) as set out in the *Privacy Act 1988* (Cth) (as amended) (**Act**); and
- appropriately deal with inquiries or complaints from individuals as to our compliance with the APPs.

This policy describes how we protect the personal information we hold about you, in accordance with those requirements.

The APPs do not apply to certain records relating to the employment relationship between us and our employees. In addition, certain disclosures of personal information between related bodies corporate do not have the same protection as disclosures to other persons.

What is personal information?

Personal information means any information or an opinion about an identified or reasonably identifiable individual, whether the opinion is true or not and whether the information or opinion is recorded in a material form or not.

What information do we collect about you?

The types of personal information we may collect includes information relevant to our relationship with you or the service you are enquiring about. For example, your name, signature, address, telephone number, email address and bank account details.

Bates Smart does not collect sensitive information.

How do we collect your information?

Where possible, we will collect personal information directly from you or where it is provided to us with your permission. Information is generally sought when you contact us about our services and through your interaction with us via phone, mail or email communications.

In the unlikely event that we collect personal information about you from third parties, we will take reasonable steps to contact you to ensure that you are aware of the circumstances surrounding the collection and the purposes for which we collect your personal information.

We may also use technology to collect tracking information gathered from the use of our website. Our web servers automatically collect limited information about your computer's connection to the

internet, including your IP address and when you visit our website. This requires the use of a standard feature of browser software, called a “cookie”, which assigns to each visitor a unique random number or user ID which resides on your computer. Cookies help give us an idea of which parts of our website you are visiting but do not identify you.

To make use of certain features on our website, you may need to register and provide your personal information as part of the registration process.

Why do we collect information, how do we hold information and when will we disclose information?

The purposes for which we will generally collect and use your information include:

- to establish and maintain your relationship as a client of Bates Smart;
- to provide the information and services you request from Bates Smart;
- to manage and administer those services;
- to respond to enquiries;
- conducting customer service satisfaction as a means of improving or developing our services;
- when you apply for a job with us; and
- tell you about our services.

Where we collect your personal information for a specific purpose not outlined above we will, at the time of collection, disclose the purpose for the collection.

Bates Smart does not disclose personal information to third parties unless they are related bodies corporate or unless you request us to do so or consent to us doing so in order to fulfil our legal obligations.

We may hold personal information in hard copy, on our computer systems or in the cloud.

We will use reasonable steps to protect your personal information from loss, misuse, interference, unauthorised access, modification or disclosure. Such steps include using information technology and processes, restricting access to your personal information to our employees, protecting hard copy documents from unauthorised access or use by storing them at secure premises, using firewalls and computer and network security systems with password protection and destroying any personal information no longer required.

Please be aware that we cannot guarantee the protection of the personal information you provide over the internet.

From time to time our website may contain links to other websites. Bates Smart is not responsible for those sites and their privacy policies.

Will you use my personal information for marketing?

From time to time we may use your personal information to give you information about us and the services we believe you might be interested in.

We will only use such information for the purpose of marketing where:

- we have collected the personal information from you directly;

- you would reasonably expect us to use or disclose the information for the purpose of marketing; and
- there is a means through which you can request to not receive marketing communications and you have not requested that such communication cease.

If you do not wish to receive information about us or our services, then please contact us.

How can I access my personal information?

You may request access to the personal information held about you at any time. If you wish to access your personal information, then please advise us using the contact details below.

We may be prevented from permitting access to personal information held about you in certain circumstances, including where:

- access would unreasonably impact on the privacy of another individual;
- access would lead to the disclosure of commercially sensitive information of our clients, agents or contractors;
- we are prohibited by law or a court/tribunal order; or
- the information relates to existing or anticipated legal proceedings.

If we deny you access to your personal information, we will provide a written explanation of the reasons for such a refusal, together with details of our complaints handling procedure if you wish to challenge the decision.

Bates Smart may charge you our reasonable costs incurred in supplying you with access to this information.

What if my personal information is incorrect?

Bates Smart will take reasonable steps to ensure that personal information held about you is accurate, complete and up-to-date. If you believe that the personal information we hold about you is incorrect, out of date or incomplete, then please advise us using the contact details below.

We will take reasonable steps to correct the information where we are satisfied that it is inaccurate, out-of-date, incomplete, irrelevant or misleading for the purpose for which it is held.

Can I remain anonymous?

You may elect to have your anonymity protected by withholding your personal information or using a pseudonym however given the nature of the services provided by Bates Smart, this may not be feasible.

Is my personal information disclosed to overseas recipients?

Bates Smart does not disclose personal information to overseas recipients.

Will I be notified if this privacy policy changes?

This privacy policy replaces any previously issued privacy policies. Our privacy policy may change from time to time and we will notify you of any change by posting an updated version on our website at <http://www.batesmart.com.au/>.

How can I lodge a complaint / contact Bates Smart?

If you have a complaint regarding Bates Smart's compliance with privacy laws or the treatment of your personal information, or if you want to access or correct your personal information, then please contact us:

- by phone on (03) 8664 6200 (VIC) or (02) 8354 5100 (NSW);
- via email at enquiries@batesmart.com ; or
- in writing at either:
 - 1 Nicholson Street, Melbourne VIC 3000
 - 43 Brisbane Street, Surry Hills NSW 2010

We will endeavour to respond to complaints and requests within 14 days of their receipt. If you are dissatisfied with our response, you may refer the matter to the Australian Information (Privacy) Commissioner (www.oaic.gov.au).