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## **PRIVACY COLLECTION STATEMENT**

**Ikon Communications Group Pty Ltd (ACN 087 312 918) (Ikon Communications)** collects personal information about you from [www.ikoncommunications.com.au](http://www.ikoncommunications.com.au), any related Ikon Communications or client website, social media page, internal website or intranet and any Ikon Communications or client mobile or tablet application (each, a **Website**); personal information provided to us by our clients and customers; personal information collected by us on behalf of our clients and customers as a result of the provision of professional services to our clients and customers, and; as provided by you by any other means, including either physically or electronically. Occasionally, we collect personal information from social media sites or from commercial data providers, referral agents, and other data providers who obtained your personal information from third party sources who hold your consent to disclose your personal information to us, or who have otherwise disclosed your personal information to us in circumstances where it is lawful to do so. Personal information will not be collected from any person who is known by Ikon Communications to be under the age of fifteen (15) without the consent of a parent or legal guardian. Personal information is collected in order to respond to enquiries including employment enquiries, provide you with newsletters and electronic newsletters, to obtain opinions or comments about products and/or services, to conduct research, to provide professional services to our clients and customers and to provide you with certain content, products and services and, unless you opt-out or unsubscribe, contact you in the future with information on products and services and to provide you with marketing materials via any medium including mail, telephone and commercial electronic messages (SMS (Short Message Service), MMS (Multimedia Message Service), IM (Instant Messaging) and email) or any other form of electronic, emerging, digital or conventional communications channel whether existing now or in the future. Our Websites may also collect and use passively collected anonymous information or personal information from various third party sources and we may combine this anonymous information or personal information with other personal information collected from you, to provide better service to Website users, customise a Website based on your preferences, compile and analyse statistics and trends, and otherwise administer and improve Websites for your use. For the purposes described above, your information may be shared with Ikon Communications group companies (and their directors, servants and agents), clients, promotional partners and other trusted third parties, either in Australia or overseas including in New Zealand and Asia, who may also contact you with information about products and services and with marketing materials, including electronically. Failure to provide personal information may result in you being unable to receive newsletters, Ikon Communications being

unable to provide you with certain content, products or services. Our Privacy Policy (see below) contains information about how you can access and correct your personal information, how you can lodge a complaint regarding the handling of your personal information and how any complaint will be handled by Ikon Communications. You may contact our privacy officer with any queries via email: [info@ikoncommunications.com.au](mailto:info@ikoncommunications.com.au) or mail: Level 4, 1 Kent Street, Sydney NSW 2000 or telephone: (02) 9290 7500.

## PRIVACY POLICY

Ikon Communications Pty Ltd (ACN 087 312 918) (**Ikon** or **We/we** or **Our/our** or **Us/us**) is committed to respecting the privacy of your personal information.

This Privacy Policy explains our policy for dealing with personal information that we collect through the following channels (here and after, the **Collection Channels**):

- our online properties (here and after, each a “**Website**”), including:
  - our websites, including but not limited to [www.ikoncommunications.com.au](http://www.ikoncommunications.com.au);
  - any related Ikon or client website, social media page, internal website, intranet and any Ikon or client mobile or tablet applications;
- personal information provided to us by our clients and customers and personal information collected by us on behalf of our clients and customers as a result of the provision of professional services to our clients and customers; and
- any other means through which an individual provides personal information to Ikon and its clients, including either physically or electronically.

You may contact us with any queries you may have in respect of this Privacy Policy or your personal information by contacting Ikon’s privacy officer via email: [info@ikoncommunications.com.au](mailto:info@ikoncommunications.com.au) or telephone: 02 9290 7500.

### **Personal information is important to Ikon**

1. Ikon is committed to safeguarding personal privacy. It recognises that you have a right to control how your personal information is collected and used. Providing personal information is an act of trust and it is taken seriously. Unless given consent to do otherwise, Ikon will only collect and use personal information as set out below.
2. Throughout this Privacy Policy, we refer to your 'personal information', which means information which identifies you as an individual or which renders you reasonably identifiable. Your full name, gender, date of birth, home address, home telephone number, mobile telephone number, email address and workplace contact details are examples of information which may constitute personal information. Personal information may also include information we may collect about your individual preferences.
3. Ikon has developed and implemented its Privacy Policy with respect to personal information to reflect world best practice on privacy policies. These principles meet and exceed the requirements of the *Privacy Act 1988* (Cth) (as amended) and the 13 Australian Privacy Principles.
4. In order to keep up with changing legislation and best practice, we may revise this Privacy Policy at any time without notice. We will post any changes to this Privacy Policy on our Websites, so we encourage you to check this Privacy Policy from time to time.
5. In addition to the provisions of this Privacy Policy, there may also be specific and additional privacy and consent provisions that apply to certain Collection Channels. Because those specific and additional provisions also relate to your privacy protection, we recommend that you review them wherever they appear. In the event of any inconsistency between the provisions of this Privacy Policy and those other specific and additional provisions, the specific and additional provisions will prevail.

### **Anonymity and pseudonymity**

6. Where practicable, we will allow you to deal with us on an anonymous or pseudonymous basis. If this is practicable, our Collection Channels will seek information in this way. However, where it is not practicable for the purposes for which information is collected, we will seek the information identified below.

### **Kinds of Personal Information that Ikon Collects and Holds**

7. Personal information that may be requested or collected by us includes:
  - a. contact information such as your full name, date of birth, telephone number, mobile telephone number, current and valid email address, residential address and postcode;
  - b. financial information;
  - c. employment details;
  - d. enquiry and complaint details;
  - e. information about your experience with our products or services or third party products or services listed on a Website. This information is requested in order to tailor our subsequent communications to you and continuously improve our products and services;
  - f. any other personal information which you directly provide to Ikon. Where you provide us with such unsolicited personal information, we will retain this information where it falls within our primary purposes for collection of personal information (as stated in this Privacy Policy); and
  - g. any other personal information requested or required by a Collection Channel.

### **Sensitive Information**

8. We will only collect sensitive information with your consent. Where you provide us with any sensitive information (including, but not limited to, information about your racial or ethnic origin, religious affiliation, political opinions, sexual orientation and/or criminal or medical history) we will only use this information for the purposes stated on the Collection Channel. We do not retain this information in our database.

### **How Ikon Collects and Holds Personal Information**

9. Ikon will only collect or monitor any personal information about you with your consent including as provided in this Privacy Policy or if it is otherwise lawful to do so. The only personal information collected by us is what has been provided to us in accordance with this Privacy Policy or has been provided to us lawfully by third parties, including our clients and customers.

### **Active Information Collection**

10. Personal information may be collected (and combined) via our Collection Channels if you:
  - a. have previously provided us with personal information prior to this Privacy Policy coming into effect, either directly from you personally or via a third party, including our clients;
  - b. sign-up and/or register to become a member of any Collection Channel, or provide your details to us or our clients via any Collection Channel;
  - c. subscribe to any newsletters, updates, alerts or news and media releases, or request launch or event information or information about our products or services or other information services as well as third party products or services;
  - d. complete and submit any forms or surveys to us or our clients, either physically or electronically;

- e. conspicuously publish or provide on request your personal information to Ikon;
  - f. contact us or our clients directly in person or via any medium including mail, telephone, social media and commercial electronic messages (SMS (Short Message Service), MMS (Multimedia Message Service), IM (Instant Messaging) and email) including via the contact details listed on a Website;
  - g. participate in any competitions, offers, promotions or marketing activities;
  - h. interact with a Website for a specific purpose; or
  - i. interact with or browse a Website generally.
11. Personal information is requested in order to facilitate or provide you with certain content, products or services, and information about such content, products or services (including the uploading, access to, and receipt of content on a Website), marketing materials, newsletters, electronic newsletters (e-newsletters), news and media releases / launch information, and also to advise you of other Ikon, client or third party products, services, offers, competitions or events which may be of interest. No one is obligated to provide personal information. However, failure to do so may result in Ikon or its clients being unable to facilitate or provide you with certain content, products or services, products or services information, upcoming promotion, competition, offer or event information or accept competition entries (where applicable).
12. We may also obtain your personal information from legitimate third party sources including list brokers, referral agents, our clients, social media and other data providers or organisations that share data in circumstances where it is lawful and/or you have given permission for them to do so.

### **Children**

13. Personal information will not be collected by any person who is known by Ikon to be under the age of fifteen (15) without the consent of a parent or legal guardian. Persons under age fifteen (15) may only use our Websites with the involvement and consent of a parent or legal guardian.

### **Passive Information Collection**

14. As you navigate through our Collection Channels, certain information can be passively collected (that is, gathered without you actively providing the information) using various technologies, such as Unique Device Identifiers (**UDI**), cookies, Internet tags or web beacons, and navigational data collection (log files, server logs, clickstream). In certain circumstances, this information may be considered anonymous information or personal information under the *Privacy Act 1988* (Cth). This is dependent on the device used and the method by which an individual connects to the Internet. Your Internet browser automatically transmits to the Collection Channel you are browsing some of this anonymous information or personal information, such as the URL of the website you just came from, the Internet Protocol (**IP**) address, the UDI (if applicable) and the browser version your device is currently using. The Collection Channels may also collect anonymous information or personal information from your device through cookies and Internet tags or web beacons. You may set your browser to notify you when a cookie is sent or to refuse cookies altogether, but certain features of a Collection Channel might not work without cookies and this may limit the services provided by a Collection Channel. Cookies and other technical methods may involve the transmission of information either directly to us or to another party authorised by us to collect information on our behalf.

### **Purposes for which Ikon collects, holds, uses and discloses personal information**

15. Personal information collected will be collected, used and/or disclosed for the following primary purposes:
- a. For the purposes for which it was collected (as advised in this Privacy Policy).
  - b. For the purposes stated in a privacy collection statement on a particular Collection Channel.

- c. To fulfil obligations in respect of any contract between you and Ikon or you and one of our clients.
  - d. To provide you with information about your transactions (including uploading, access to, and receipt of content on a Website), content, services and products, to provide direct marketing materials, events, special offers, competitions and promotions in person and via any medium including mail, telephone and commercial electronic messages (SMS (Short Message Service), MMS (Multimedia Messaging Service), IM (Instant Messaging), email) or any other form of electronic, emerging, digital or conventional communications channel.
  - e. To maintain our relationship with you.
  - f. To render services related to Ikon.
  - g. To manage your employment with Ikon (if applicable).
  - h. To provide you with newsletters via mail and electronic newsletters (e-newsletters) via commercial electronic messages.
  - i. To respond to enquiries.
  - j. To obtain opinions or comments about products and/or services and to conduct other research and development.
  - k. To share personal information with our group companies, our promotional partners and other trusted third parties.
  - l. To collect, hold, use and disclose personal information as stated above, for the purpose of providing professional services to our clients and customers.
16. For the purposes described above, personal information may be shared with our group companies, promotional partners, clients and other trusted third parties (and their directors, servants and agents) either in Australia or overseas, including, but not limited to New Zealand and Asia.
17. Failure to provide personal information may result in Ikon or its clients being unable to provide you with certain content, information, upcoming promotion, event or product information and/or accept promotion entries (where applicable).
18. In order to operate a Website or deliver a service, personal information may also be shared with our group companies, selected service providers and/or other trusted third parties either in Australia or overseas countries which may include but are not limited to New Zealand and Asia. Our group companies, selected service providers and/or other trusted third parties may be engaged to perform a variety of functions, such as data storage, conducting market research, assisting with promotions and providing technical services for our or our clients' Websites. These companies may have access to personal information if needed to perform such functions.
19. Ikon recognises the trust with which you provide personal information, and except as stated in this Privacy Policy, such information will not be used or disclosed for any other purposes without consent. However, Ikon reserves the right to use or disclose any information, including personal information, as needed to satisfy any law, regulation or legal request, to protect the rights or property of Ikon, any member of Ikon group, or any member of the public, to protect the integrity of a Website, to fulfil your requests, or to cooperate in any law enforcement investigation or an investigation on a matter of public safety.

### **Contact by Ikon**

20. Ikon (and its directors, servants and agents), Ikon promotional partners or trusted third parties (and other selected service providers and other non-Ikon companies or professionals) either in Australia or overseas, may contact you via telephone, SMS (Short Message Service), MMS (Multimedia Messaging Service), IM (Instant Messaging), email, post or any other form of electronic, emerging, digital or conventional communications channel using the information provided in order to contact you in respect of the primary purposes for collection of personal information as stated above.

21. Ikon does not send advertising or marketing information without obtaining prior consent, for example the consent contained within this Privacy Policy. If you receive communications from Ikon which you do not wish to receive, you may remove your name from the database either by utilising the functional unsubscribe facility (if the communication is via commercial electronic message) or by contacting Ikon via email: : info@ikoncommunications.com.au or telephone: 02 9290 7500. Please allow 30 days for this request to be processed.

#### **Your right of access**

22. You have the right to access and review your personal information that may be recorded on an Ikon database. Information may be reviewed by contacting Ikon's privacy officer via email: info@ikoncommunications.com.au or telephone: 02 9290 7500. Please allow 30 days for this request to be processed.

#### **Ability of others to view information**

23. We may provide areas on a Website where you can upload user-generated content, post or provide information about yourself, communicate with other users, provide reviews for content, products and/or services or interact with or vote on particular content. This information may be shared with others and may be publically posted on our Websites, including without limitation, other social media platforms and other public forums in which you choose to participate. This information may become publically available and may be read, collected and used by others outside of our Websites. We are not responsible for the conduct of others who may read, collect and use this information.

#### **Changing and deleting the information we have about you**

24. Information contained on the database may be amended, or your preferences for contact from us changed, by using the update subscription preferences function in our email communications with you or by contacting Ikon's privacy officer via email: : info@ikoncommunications.com.au or telephone: 02 9290 7500. Please allow 30 days for this request to be processed.
25. In the same way, a request may be made to delete personal information, and all reasonable steps to delete the information will be made, except where it is required for legal reasons. Deletion of information may result in Ikon and its clients being unable to facilitate or provide you with information about certain transactions (including the uploading, access to, and receipt of content on a Website), other content, services or product information, upcoming promotion, competition or event information, and/or provide certain content, goods or services.
26. We are not responsible for removing your personal information from the lists of any third party who has previously been provided your information in accordance with this policy.

#### **Storage and security of personal information**

27. Ikon will endeavour to take all reasonable steps to keep secure any personal information recorded, and to keep this information accurate, up to date, complete and relevant. The information is stored on secure servers that are protected in controlled facilities. This service may be performed on our behalf and data may be hosted by our selected data storage providers. In some cases these facilities may be overseas.

#### **Disclosure of personal information to overseas recipients**

28. In some cases, Ikon may disclose your personal information to overseas recipients, including, but not limited to, your professional information and contact details. Ikon employees, data processors and other trusted third parties are obliged to respect the confidentiality of any personal information held by Ikon. However, security of communications over the Internet cannot be guaranteed, and therefore absolute assurance that information will be secure at all times cannot be given. Ikon will not be held responsible for events arising from unauthorised access to personal information.

### **Ikon and links to other websites**

29. Our Websites may, from time to time, contain links to the websites of other organisations which may be of interest to you. Their inclusion cannot be taken to imply any endorsement or validation by us of the content of the third party website. Linked websites are responsible for their own privacy practices and you should check those websites for their respective privacy statements. Ikon is not responsible, nor does it accept any liability, for the conduct of companies linked to our Websites.

### **Related Ikon Websites**

30. All Websites operated by Ikon will adhere to this Privacy Policy.

### **Sale of the Company**

31. If Ikon merges with, or is acquired by, another company, or sells all or a portion of its assets, your personal information may be disclosed to our advisers and any prospective purchaser's adviser, and may be among the assets transferred. However, personal information will always remain subject to this Privacy Policy.

### **Problems or queries**

32. If you have any questions about our Privacy Policy, or any problems or complaints about how we have collected, used, stored, handled and/or disclosed your personal information, please contact our privacy officer via one of the following channels:

Address: Level 4, 1 Kent Street  
Sydney NSW 2000  
Telephone: 02 9290 7500  
Email: [info@ikoncommunications.com.au](mailto:info@ikoncommunications.com.au)

Please allow 30 days for this request to be processed. If you do not receive a satisfactory response from Ikon to your query, problem or complaint within 30 days, you may refer your query, problem or complaint to the Office of the Australian Information Commissioner via the contact details listed at <http://www.oaic.gov.au/about-us/contact-us-page>.