

## Privacy Policy

Contegrity Ethics Pty Ltd (ACN 664 152 827) (“**Contegrity**”, “**we**”, “**us**” and “**our**”), is committed to protecting your privacy as a user of our Contegrity Platform, (“**Platform**”) or as an online visitor to our website, <https://www.contegrityethics.com.au> (“**Website**”). We respect the privacy and confidentiality of the personal information provided by you and adhere to the *Privacy Act 1988* and Australian Privacy Principles (**APPs**). Please read our Privacy Policy below carefully.

This Privacy Policy explains how we manage the personal information that is collected, used, disclosed and stored about you.

By providing personal information to us, you consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy and any other arrangements that apply between us.

### 1. What is the Contegrity Survey?

The Contegrity Survey, which is provided on the Contegrity Platform, is a survey that you can complete to help identify, appraise and manage conflicts of interest. The Platform allows users to go through a step-by-step process for identifying conflicts of interest and developing workable management plans. The survey can be saved and used to assist with reasoning and discussions about circumstances in which a conflict of interest may arise (collectively the **Services**).

### 2. What is personal information?

When we refer to “personal information”, we mean information or an opinion about you, from which you are, or may reasonably be, identified. This information may include (but is not limited to) your name, date of birth, phone number, email address and postal address.

Personal information may also include information which is “sensitive information” under the Privacy Act. Sensitive information includes, for example, information or an opinion about an individual’s health, racial or ethnic origin, criminal record or membership of a professional association, trade association or trade union.

### 3. What information do we collect?

The personal information we collect depends on the nature of our relationship with you. For example:

- If you are an Individual using the Platform, we may collect your name, email address, mobile phone number, occupation, payment details (such as bank account or credit card details). We will also collect the type of access you require to use the Contegrity Survey (e.g. a subscription basis or a pay per use basis). If you agree to participate in a research project, we will collect additional information for which specific consent will be sought. Some of our Platform users (for example, users completing the Survey for free or a discount) may be required to provide additional information, such as their occupation and intended use of the Platform and/or to complete a user experience survey once they have completed the Survey.
- If you are a business representative, when a profile is created for your business for account management purposes, we will collect your name, work contact details including address, phone number and email address. We will also collect your business’ Australian Business Number and payment-related information, such as credit card details.
- If you apply for a job with Contegrity Ethics or are an employee, we may collect, for example, your full name, contact details (including address, phone number and email address), job title, passport details, employment history and education details, names and contact details of referees, next of kin details (in the event of an emergency) and superannuation fund and Tax File Number details, if required by law, for example, under the *Superannuation Guarantee (Administration) Act*, the *Superannuation Industry (Supervision) Act*, the *Income Tax Assessment Acts* and *Taxation Administration Act*.

We do not collect sensitive information except from job applicants and employees.

If you do not provide the information requested by us, we may not be able to provide you with our Services.

#### **4. How do we collect your personal information?**

We will collect personal information about you if you choose to provide it to us. Personal information may be collected from you in a variety of ways. We may collect your personal information when you do any of the following, for example:

- submit your details through the Platform sign-in page;
- make a payment to use the Platform;
- complete a user experience survey;
- submit an application for employment with us;
- provide feedback through comments, ideas or suggestions;
- subscribe to receive our newsletter or promotional materials or sign up to a mailing list;
- provide consent to participate in a research project that involves the Platform;
- interact with us via any of our social media pages; or
- engage with us by phone, email, or via the Services, whether you are an Individual or a business representative interested in using the Platform or a prospective employee.

We may also collect personal information about you from third parties. These third parties may include (but are not limited to):

- someone duly authorised to act on your behalf; and
- where you have provided consent, for example, from third parties, such as referees.

Our server automatically collects information about your use of the Service (**Navigational Data**). Navigational Data includes the type of browser you are using, your IP address, the URL you have come from, and the time spent at that URL, cookies and your domain type and server. This kind of information is collected by many mobile applications. We use this information to monitor your use of our Service. See "Cookies" below for further information about our use of cookies.

If you provide personal information to us about someone else, you must ensure that you are entitled to disclose that information to us. For example, you should take reasonable steps to ensure the individual concerned is aware of the various matters detailed in this Privacy Policy.

#### **5. How is personal information used?**

We may use your personal information for the following purposes:

- to provide you with the services you have requested, for example, to create a profile on the Platform in order to complete a Survey;
- to respond to your inquiry;
- to verify your identity and comply with Know Your Customer (**KYC**) requirements;
- for complaints handling;
- for data analytics;
- to improve our Services;
- to send you a request to complete a user experience survey
- to send you direct marketing messages (by email, SMS and post) which we consider may be of interest to you (unless you opt-out);
- for the prevention of fraud and/or identifying and investigating any suspicious use of our Service;
- for our internal business and management processes, for example, accounting or auditing purposes;
- for any other purpose to allow us to comply with our obligations under law; and
- for any other purposes that would reasonably be expected by you.

If you are an Individual, we collect information from you for the purposes of reviewing your application, approving and creating your profile for access to the Platform and verifying your identity. We will use your personal information to administer and manage your account with us and to facilitate payments for your use of the Platform.

If you are a representative of a business, we will use your personal information to administer and manage our relationship with your business.

If you are a job applicant, employee or contractor with Contegrity Ethics, we will use your personal information for purposes relating to your engagement, training, performance management, payroll, superannuation, health and safety, for administration and staff management purposes. Where we consider it appropriate, we may also conduct reference checks (or engage a third party to do so on our behalf).

We may use personal information which has been deidentified to create marketing statistics, identify user demands and to assist in meeting customer needs generally. We may also use this information to improve the Platform and our Services.

## **6. Will personal information be disclosed to third parties?**

Personal information may be disclosed to third parties in the circumstances below.

### **6.1 Third party contractors and service providers**

Personal information collected by us may be disclosed to third parties to whom we contract out specialised functions and to service providers. Functions which are outsourced include Platform hosting and maintenance services, credit card and other payment processing, website development, cloud storage services and digital marketing services. Your personal information may be disclosed to our professional advisors including lawyers, accountants, tax advisors and auditors;

### **6.2 Disclosures required by law**

For legal reasons, other disclosures may need to be made to law enforcement agencies, government agencies, courts or external advisors or as otherwise required or authorised by law.

### **6.3 Sale of Business**

We reserve the right to transfer information (including your personal information) to a third party in the event of a sale, merger or other transfer of all (or substantially all) of the assets of Contegrity Ethics provided that the third party agrees to adhere to the terms of this Privacy Policy and handle personal information in accordance with the APPs.

## **7. Direct marketing**

From time to time, we may use your personal information to provide you with information about our services, special offers you may find of interest or new services being offered by us or any business we are associated with. Direct marketing messages may be sent by email, SMS or post.

If you do not wish to receive marketing information, you can at any time opt-out by contacting our Privacy Officer using the contact details below or by using the opt-out facilities provided (such as an unsubscribe link in an email). Please note that if you opt-out, we may still send you non-promotional messages, such as transactional messages regarding engagements, payments or information about your account.

## **8. Cookies**

We may collect personal information about you when you use and access our Platform and Website. While we do not use browsing information to identify you personally, we may record certain information about use of the Platform or Website, such as the pages or screens visited, the time and date of the visit and the internal protocol or IP address assigned to the computer or device.

Our Platform and Website also use cookies or similar tracking technologies to help us track Platform and Website use and remember user preferences. Cookies are small files that store information on your

computer, mobile phone or other device. A cookie enables the entity that put the cookie on your device to recognise you when you use different websites, devices and/or browsing sessions.

We may also use cookies to collect data that may include personal information, for example, where a cookie is linked to your user account. Where we collect personal information via cookies, the personal information will be handled in accordance with this Privacy Policy.

You can disable cookies through your internet browser. However, our Platform and Website may not work as intended if you do so.

## **9. Accessing and correcting your personal information**

We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up-to-date. You can help us to do this by letting us know if you notice errors or discrepancies in the information we hold about you and letting us know if your personal details change.

You are entitled to access and correct your personal information we hold on request. To request access to and/or correction of your personal information, please contact our Privacy Officer using the contact details set out below. After receiving a request from you, we will take reasonable steps to correct the information. Alternatively, you may be able to update your contact information, for example, by logging into your account.

You will not be charged for making an access and/or correction request but you may be charged for the reasonable time and expense incurred in compiling information in response to your access request.

We may decline your access and/or correction request in certain circumstances in accordance with the APPs. If we do refuse your request, we will provide you with a reason for our decision and, in the case of a request for correction, we will include a statement with your personal information about the requested correction.

## **10. Is personal information stored safely?**

We take reasonable steps to ensure the security of personal information held by us from such risks as loss or unauthorised access, destruction, use, modification or disclosure. Our IT systems are password protected and comply with our security standards, and if personal information is held on paper files, it is stored in premises that are locked when unattended.

While you are completing the Contegrity Survey, your responses are stored securely on a server in Melbourne controlled by the Australian Consortium for Social and Political Research Incorporated (**ACSPRI**). When you complete the survey, you will receive a prompt requesting whether you wish your responses to be:

- (i) erased once you have printed the Contegrity Survey or report (which may be downloaded to your Device); and/or
- (ii) submitted to Contegrity so that the responses may be used in formal research projects.

We do not access your responses unless you have provided us with your consent.

## **11. Third party websites**

Sometimes our Services contains links to other websites and mobile applications for your convenience and information. When you access a website through our Services, please understand that we are not responsible for the privacy practices of that site. We recommend that you review the privacy policies of each site you visit.

Any information you provide to third party websites will be governed by the terms of the websites' privacy policies. We have no responsibility or liability whatsoever for the content, actions or policies of third party websites.

## **12. Further information and complaints**

You may contact us at any time if you have any questions or concerns about this Privacy Policy or about the way in which your personal information has been handled.

You may make a complaint about privacy to our Privacy Officer using the contact details set out below.

The Privacy Officer will first consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint.

Your complaint will then be investigated. We may ask you to provide further information about your complaint and the outcome you are seeking. We will then typically gather relevant facts, locate and review relevant documents and speak with individuals involved.

In most cases, we will investigate and respond to a complaint within a reasonable time, usually within 30 days of receipt of the complaint. If the matter is more complex or our investigation may take longer, we will let you know.

If you are not satisfied with our response to your complaint, you may make a complaint to the Office of the Australian Information Commissioner (**OAIC**). The OAIC can be contacted by telephone on 1300 363 992 or by using the contact details on the website [www.oaic.gov.au](http://www.oaic.gov.au)

### **13. Contacting us**

You can contact our Privacy Officer by:

- emailing us at [wendy@contegrityethics.com.au](mailto:wendy@contegrityethics.com.au)

### **14. Changes to this Privacy Policy**

We may change this Privacy Policy from time to time. When we make changes, we will post a notice on our Website homepage and make a new copy of the updated Privacy Policy available on our Platform. Where changes to the Privacy Policy are material, we will provide you with reasonable notice before the changes take effect. If you continue to use our Platform after the effective date of the changes, you will be taken to have accepted the amended Privacy Policy.

**Last Updated:** 24 May 2024