

## **Privacy Policy**

### **1. Overview:**

The Privacy Act 1988 (Cth) and the Australian Privacy Principles set out in that Act govern the way in which we must manage your personal information. At Co-Hab Tonsley, your privacy is a priority and we are committed to ensuring your personal information is protected.

Co-Hab Tonsley does not disclose personal information about you except as mentioned below. Co-Hab Tonsley does not collect personally identifiable information about you, except when it is knowingly provided by you. Co-Hab Tonsley's policy in respect of its management of your personal information is set out in this Privacy Policy.

### **2. Collection:**

The types of personal information we collect about you:

- will depend on what services, products, programs or memberships you use, acquire or are involved in;
- includes information that can identify you and which may include your name, contact details, address, telephone and mobile number, email address, fax number, business locations, areas of specialisation or interest, associations or organisations that you may be a member of, other contact details and other information relevant to providing you with the services, products, programs or memberships you require, or any other information you choose to provide us with.

We will not collect sensitive information concerning you unless you have consented or it is required by law.

### **3. Purpose of collection:**

Co-Hab Tonsley collects personal information:

- to provide services, products, programs, memberships or benefits to you;
- to process any application, registration, membership, or comment or request you make;
- to provide you with promotional information or information about other services that we, or other organisations that we are affiliated with, may offer, that you may be interested in;
- to identify, establish and provide other services or benefits;
- to assist us in carrying on our business operations;
- to better service your relationship with us;
- to analyse our services, products, programs or memberships and client needs with a view to developing new or improved services, products, programs, memberships or benefits and marketing them;
- for subscriptions, entry into competitions, participation in surveys or similar activities;
- to act as your agent if you request us to do so;
- for the purposes of providing commercial or education services or benefits;
- for undertaking any activity required by law.

### **4. Methods of collection:**

Co-Hab Tonsley only collects personal information by fair, lawful and non-intrusive means and information will generally be collected directly:

- by contact with you, personal or online;
- from the information provided by you to us;
- through membership registrations;
- through program applications;
- from our standard forms;
- from online profiles;
- from communications and discussions with you and your employees, related companies or your representatives;
- from sources available publicly; and
- when required by law to do so.

There may, however, be some instances where personal information will be collected indirectly because it is unreasonable or impractical to collect personal information directly from you. Normally you will receive notification about these instances in advance, or where it is not possible to do so, as soon as reasonably practicable after the information has been collected.

### **5. Failure to provide information:**

Unless required by law, you can choose not to provide personal information. You can also choose not to identify yourself when dealing with Co-Hab Tonsley. However, if personal information is not provided or you do not identify yourself or if the information is incomplete or inaccurate at any time, Co-Hab Tonsley may not be able to effectively provide certain services, products, programs, memberships, benefits, access or information you require.

## 6. **Use and disclosure:**

Co-Hab Tonsley uses personal information for the purposes for which it is collected and directly related purposes and in the normal business operation and marketing of our business. We may also use this information to send information about Co-Hab Tonsley or information from our associates.

Our events may be recorded to enable improvements to be made and for promotional purposes.

Co-Hab Tonsley may also disclose personal information to the following persons or organisations (who may not be required to comply with our Privacy Policy):

- to service providers, information systems and technology organisations or other contractors who assist us in operating and managing our business or performing functions on our behalf such as marketing programs and client services and we will request that they not use your personal information for any other purpose unless you agree;
- to other service providers or our related entities, our associates or other affiliated organisations who provide various products or services or information that you may have requested or we have arranged or that may be of interest to you;
- mailing houses, printers and courier services;
- marketing organisations and market research companies;
- event organisers, participants, speakers, facilitators, sponsors and potential sponsors (to enable assessment of whether to sponsor an event or participate in our activities);
- advertising organisations and sound and image recording organisations;
- education providers; mentors, and consultants;
- our legal, accounting, financial or other professional advisors;
- social media platforms;
- international organisations with which we have agreements or arrangements;
- if required by law or to protect our rights, safety or property.

In addition, any person who is a participant in a program, membership or other similar activity, may have their name and contact information published on the Co-Hab Tonsley website, the Co-Hab Tonsley program database, the membership database and any other Co-Hab Tonsley publications.

Personal information entered into the Co-Hab Tonsley database will not be used or disclosed by us, other than as authorised by you or as set out in this Privacy Policy.

## 7. **Non-disclosure of personal information:**

If you do not want your personal information to be disclosed Co-Hab Tonsley will endeavour to accommodate this request if that disclosure is not required by law. However, if your personal information is not disclosed, Co-Hab Tonsley may not be able to effectively provide certain services, products, programs, memberships, benefits, access or information you require.

## 8. **Data quality and security:**

The security of your personal information is important to us. We take all reasonable steps to ensure that:

- the personal information we collect, use or disclose is accurate, complete and up-to-date; and
- your personal information is stored safely and protected from misuse, interference, loss, unauthorised access, modification or disclosure.

Access to your personal information is restricted to persons, employees, associates and third party providers who need to know that information in order to deliver our services, products, programs, memberships and benefits.

Please be aware that no data transmission over the internet can be guaranteed to be totally secure. As a result, while we strive to protect your personal information and make our best effort to ensure its security on our systems, Co-Hab Tonsley cannot ensure or warrant the security of any information you provide to us, and you do so at your own risk.

Co-Hab Tonsley will take reasonable steps to destroy or de-identify personal information in the event that it is no longer needed for any purpose for which the information may be used or disclosed.

## 9. **Links to other websites:**

Links to other sites may be provided for convenience and Co-Hab Tonsley does not endorse any linked website. Co-Hab Tonsley is not responsible for the privacy practices or the content of any linked websites and therefore linked websites are not subject to our Privacy Policy or procedures. You are encouraged to read the privacy policy of any linked site.

## 10. **How to Opt-out:**

You may opt-out of receiving optional information from us or our service providers or associates at any time by notifying us by following the opt out instructions on the message we have sent to you or by sending an email to us.

**11. Changes to our Privacy Policy:**

Our Privacy Policy may change from time to time at our discretion, however, if fundamental changes are made to the way that we use your personal information, then we will undertake to notify you via email or notice on our website and await consent from you for the changes.

**12. Access and contact:**

You may access the personal information we hold about you by making a written request to us. We will ask that you satisfy identity validation procedures to prove that you and the individual requesting the personal information are one and the same. We may decline a request for access to personal information where we are required by law to do so. If, at any time, you believe the personal information we hold about you is inaccurate, incomplete or out of date, please notify us immediately. We will take reasonable steps to correct the information so that it is accurate, complete and up-to-date.

**13. Complaints:**

If you believe that we have breached your privacy rights in any way or wish to discuss any issues about our Privacy Policy or the way in which we handle your personal information, please contact our privacy officer (see below) and we will try to satisfy any questions you may have and correct any errors within a reasonable period after receipt of the complaint. If you still think your concern has not been satisfied, you have the right to make a complaint to the Office of the Australian Information Commissioner at 1300 363 992.

**14. Definition:**

In this Privacy Policy “Co-Hab Tonsley” means Co-Hab Tonsley Limited ACN 602 663 829.

**Our Contact Details:**

To: Privacy Officer  
Co-Hab Tonsley Limited ACN 602 663 829  
Level 1, Mitsubishi Building,  
1284 South Road,  
Clovelly Park. SA 5042  
Ph: +61 448 053 024  
Email: [privacy@co-hab.com.au](mailto:privacy@co-hab.com.au)