



Privacy Policy

www.wbhlegal.com.au

Last updated: 1 July 2015

This Privacy Policy (“**Policy**”) applies to all personal information and credit related personal information WBH Legal (“**we**”, “**us**”) collects, holds, uses and discloses.

Our management of personal information and credit related personal information is governed by the Australian Privacy Principles (“**APPs**”) and Part IIIA (“**credit reporting provisions**”) of the *Privacy Act 1988* (Cth) (“**Act**”) (as amended from time to time). We are also subject to the Credit Reporting Privacy Code (“**CR Code**”) in relation to our management of credit related personal information.

We understand and appreciate the fact that our clients are concerned about the privacy afforded to their personal information collected by WBH Legal. We are committed to providing our clients with a high level of privacy in relation to the personal information that is collected.

By providing your personal information (including credit related personal information) to WBH Legal, you are agreeing to be bound by this Privacy Policy. This Policy may be amended from time to time. You will be notified of any amendments to this Policy by an updated Policy being posted to our website.

Personal information collected

The type of personal information generally collected and held by WBH Legal includes:

- your name, address, telephone number, facsimile number and email address;
- financial details, including credit card details and bank details;
- business details, including ABN; and
- any other information voluntarily provided by you, for example, when you send us an enquiry from our website or apply for employment with, or to provide services for, us.

When you look at our website located at www.wbhlegal.com.au, our internet service provider makes a record of your visit. The following information is logged for statistical purposes:

- your server address;
- your top level domain name (for example .com, .gov, .au, etc.);
- the date and time of your visit to the site;
- the pages you accessed and documents downloaded;
- the previous site you have visited; and
- the type of browser you are using.

We may also collect and hold the following sensitive information, with your consent and if reasonably necessary for the purposes of providing our legal services to you:

- racial or ethnic origin;
- membership of a professional or trade association;
- membership of a trade union;
- religious beliefs or affiliations;
- sexual orientation or practices;
- criminal record;
- political opinion or membership of a political association; or
- philosophical beliefs.

Credit related personal information collected

WBH Legal may collect, use, hold and disclose the following types of credit related personal information:

- identification information - name, date of birth, current or previous address, name of current employer, driver's licence number;
- type and amount of credit sought;
- publicly available information about an individual's creditworthiness;
- consumer credit liability information- name of credit provider, type of consumer credit, details of the consumer credit provided;
- default information;
- repayment history information;
- payment information in relation to an overdue payment;
- new arrangement information;
- court proceedings information;
- personal insolvency information; or
- opinion that a serious credit infringement has been committed by an individual.

Means of collection of personal and credit related information

We may collect information about you in a number of ways, including:

- when you seek legal advice or services;
- when you use our website;
- when you attend an event hosted by us;
- when you apply to be employed by us; or
- when you apply to provide services to us.

In some circumstances, where it is unreasonable or impracticable to collect information from you, we may collect personal information about you from a third party. For example, we may collect information from a publicly maintained record, from other parties that have a business relationship with you or from a government body. WBH Legal will inform you if it collects or receives personal or credit related information from a third party.

If WBH Legal receives any information which it has not solicited from you directly it will take such steps as are necessary to lawfully destroy or de-identify the information if WBH Legal cannot establish that it could otherwise have lawfully obtained the information.

Purposes for collection

We collect, hold, use and disclose where necessary personal information and credit related personal information to allow us to:

- perform the services that you have requested;
- answer a query you have made;
- send you information on news, publications, seminars and events (including invites to seminars or events hosted by WBH Legal);
- send you invoices or reminder notices;
- comply with our statutory or professional obligations;
- process your requests of, or applications to, us; or
- other purposes related to any of the above.

If we do not collect your personal or credit related personal information we may be unable to provide you with the legal (or other) services that you have requested, including undertaking any of the above purposes of collection.

Use and disclosure of personal information

We respect the confidentiality of the information you provide to us. As such, we will only use your personal information for the purpose for which it was collected (“**primary purpose**”) or for a purpose related to the primary purpose, if this use would be reasonably expected by you, or otherwise, with your consent or as required by law.

Under no circumstances will your email address be added to a third party mailing list or used for any other purpose without your consent being obtained or where it is required by law. However, you should be aware that there are inherent risks transmitting information across the internet.

We may disclose your personal information to third parties that assist us to provide our services and undertake any of the purposes for collection.

Quality of information

Our goal is to ensure that your information is accurate, relevant, complete and up-to-date. To assist us with this, please contact us if any of the details you have provided change. Further, if you believe that the information we have about you is not accurate, complete or up-to-date, contact us and we will use all reasonable efforts to correct the information. We require such queries and requests to be in writing and directed to our Privacy Officer (details provided below).

Storage and Security

Your information will be stored as physical files in a secured area, on our electronic data base system and on computers with appropriate back up and security systems. Archived files are

stored in secure on and off site storage. WBH Legal also stores its electronic data on secure off site servers.

We take reasonable steps to hold information securely in electronic or physical form. WBH Legal is committed to keeping secure the data you provide to us and we will take all reasonable precautions to protect your personally identifiable information from loss, misuse, interference, unauthorised access or alteration.

We aim to achieve this through:

- imposing confidentiality requirements on our employees;
- implementing policies in relation to document storage security;
- implementing security measures to govern access to our systems;
- only providing access to personal information once proper identification has been given;
- controlling access to our premises; and
- implementing website protection measures.

Disclosure to overseas entities

WBH Legal may disclose your personal information to overseas parties in order to facilitate the performance of the services you have requested from us. It is not practicable for us to state which countries these recipients are likely to be located as this will be dependent on the particular circumstances of the services that we are providing to you.

Access to and correction of information

You are entitled to have access to and seek correction of any information that we may hold about you. We require such requests to be in writing and sent to our Privacy Officer (details below).

WBH Legal will take appropriate steps to verify your identity (or verify that you act as a legal guardian or authorised agent of the individual concerned) before granting a request to access your information.

We will respond to your request for access to your information within a reasonable time after you make the request and if access is granted, access will be provided within 30 days from your request. Your request for correction will be dealt with within 30 days, or such longer period as agreed by you.

If we deny your request for access or correction, we will provide you with a written notice detailing reasons for the refusal and the process for making a complaint about the refusal to grant your request.

We will accept your request for access unless:

- giving access would be unlawful;
- we are required or authorised by law or a court/tribunal order to deny access; or
- giving access is likely to prejudice one or more enforcement related activities conducted by an enforcement body.

Where your request for access is accepted, we will provide you with access to your information in a manner, as requested by you, providing it is reasonable to do so.

We will accept your request for correction where we are satisfied that your information is inaccurate, out-of-date, incomplete, irrelevant or misleading. Upon accepting a request for correction of your information, we will take all steps that are reasonable in the circumstances, having regard to the purpose for which your information is held, to correct your information.

If your request for correction of information is accepted we will provide written notice of this correction to any entity to which we have disclosed this information previously, to the extent that this is practicable.

Cookies

A cookie is a piece of information that an Internet website sends to your browser when you access information at that site. Cookies indicate to a website that you have been there before and they can be used to record what parts of a website your computer is visiting. Cookies do not identify individual users, although they do allow identification of the type of browser used and the Internet Service Provider (“**ISP**”).

Cookies can be either “persistent” or “session” based. Persistent cookies are stored on your computer, and may be used to track your browsing behaviour upon return to the issuing website. On the other hand session cookies are short-lived and are used only during a browsing session, and expire when you quit your browser.

This website only makes use of session cookies. It is only during a search query of the website that session cookies are used. No cookies are used on this website except for those associated with the search engine. The website statistics for this site are generated from the web logs as outlined above.

Links

The WBH Legal website may contain links other websites that are included on the basis of containing content related to our business and areas of practice, or to sites containing general information for the personal interest of the user. When a user has clicked on a link to another site, they leave the WBH Legal site and are no longer protected by this Policy.

Promotional material

If you have agreed to receive email communications from us and later change your mind, you may contact us to have your name removed from our distribution lists. You have the following options to do this:

- you can send an email to admin@wbhlegal.com.au or
- you can send mail to the following address:

WBH Legal
24-26 Halifax Street
Adelaide SA 5000

You may view this Policy at our office. This document sets out our policies on the management of your personal information.

Dealing with us anonymously

Where lawful and practicable to do so, you can deal with us anonymously or using a pseudonym. The circumstances in which you can deal with us anonymously or using a pseudonym include making a general enquiry about the services that we can offer to you including in person or via our website or the telephone. At the time you engage our services, it is no longer practicable for us to deal with you anonymously or using a pseudonym.

Complaints

If you believe that WBH Legal has breached a term of this Policy, the APPs, the credit reporting provisions or CR Code, you may submit a written complaint. The written complaint can be emailed or posted to us using the contact details set out below. You must include contact details for us to contact you regarding your complaint.

Our Privacy Policy Officer will consider your complaint and respond as soon as reasonably possible after receiving the complaint.

If you are unsatisfied with the outcome of your complaint you may ask that the Privacy Officer refer the complaint to a higher authority within WBH Legal, such as one of the Partners. If you still remain unsatisfied with the outcome, you may refer your complaint to the Office of the Australian Information Commissioner to be resolved.

Contacting us

If you wish to:

- gain access to your personal information;
- make a complaint about a breach of your privacy;
- contact us with a query about how your personal information is collected or used;
- contact us regarding any other matter concerning this Policy,

you can speak directly with our staff who will do their best to try to resolve your issue as simply as possible. Alternatively, you can write to us or send us an email so that our Privacy Officer can consider the matter. We will respond to you as soon as reasonably possible.

Our contact details are as follows:

Phone:	08 8410 4420
Privacy Officer contact:	Ron Bellman or Cindy Hynes, Partners
Email address:	admin@wbhlegal.com.au
Postal address:	24-26 Halifax Street, Adelaide SA 5000

For more information on privacy see the Office of the Australian Information Commissioner's website at: <http://www.oaic.gov.au>.