

# **Strategic Social Profiles Privacy Policy**

## **Introduction**

Strategic Social Profiles (SSP) understands that your privacy is important and recognises the importance of respecting customer and employee privacy. SSP chooses to comply with the Australian Privacy Principles (APPs) in the *Privacy Act 1988*. The APPs regulate the manner in which personal information is handled throughout its life cycle, from collection/receipt to use and disclosure, storage, accessibility and disposal. Client reference throughout this document refers to either an Individual or Company, dependent on Service provided.

## **Purpose**

The purpose of this Policy is to answer the following questions:

1. What personal information does SSP collect?
2. How is personal information collected and stored?
3. How is personal information used?
4. Will personal information be given to anyone else?
5. Collection of other information;
6. Security of personal information;
7. How can you access and correct your personal information?
8. Opting Out; and Policy

## **What personal information does SSP collect?**

Personal information is any information, including an opinion, which can be used to identify an individual or linked to an individual. Examples include an individual's name, address, contact number or email address. Subject to legislative requirements, SSP will only collect personal information relevant to its business or employment relationship with you.

Depending upon the service SSP is providing to you, we may ask you to provide us with certain details including, for example, your name and contact information, employment background information, skills, education and information about your use of our services. The collection of sensitive personal information is restricted by the provisions of the Privacy Act. This means that we will not collect any sensitive information about you – for example, personal information relating to your religious views, ethnicity, political opinion, health, criminal record or sexual preference, unless this is necessary to provide you with a specific product or services and you have consented to that collection.

If SSP receives any personal information from you that we did not request, then as soon as practical after SSP becomes aware, and if SSP may lawfully do so, SSP will destroy or de-identify that information and will not keep any record of it. You are free to ask SSP at any time to delete your personal information from SSP's database as explained in the "Opting-out" section below.

## **How is your personal information collected and stored?**

If it is reasonable and practicable, we will collect personal information directly from you. How we collect your personal information will depend upon how you interact with us. We may collect it through application forms, service agreements, telephone, email

and internet contact, from correspondence with you and in person through meetings with you. Where SSP collects personal information directly from you, SSP's policy is to take reasonable steps to notify you of certain matters. SSP will do this at or before the time of collection, or as soon as practicable afterwards. The matters include:

- our identity and how to contact us;
- the purposes for which we are collecting the information;
- whether the collection is required or authorised by or under Australian law or a court or tribunal order;
- the third parties (or types of third parties) to whom we would normally disclose information of that kind;
- whether any of those third parties are located overseas and, if practicable to specify, the countries in which they are located; and
- the fact that this Privacy Policy contains information about how to access and correct personal information and make privacy complaints (and how SSP will deal with those complaints).

We will generally include these matters in a collection notice. For example, where personal information is collected on a paper or website form, we will generally include a collection notice, or a clear link to it, on the form. Collection notices may provide more specific information than this Privacy Policy in relation to particular collections of personal information.

The terms of this Privacy Policy are subject to any specific provisions contained in collection notices and in the terms and conditions of particular offers, products and services. We encourage you to read those provisions carefully. There may be occasions where we need to collect personal information from other parties with or without your direct involvement, for example, publicly available sources of information.

SSP may collect personal information from the following web sites or Company:

- LinkedIn
- Facebook
- Google Search

Through receiving emails, we may also use third parties to analyse traffic at those websites. Information collected through such analysis is anonymous. SSP takes reasonable steps to ensure the security of personal information held by it from such risks as loss or unauthorised access, destructions, use, modification or disclosure.

SSP may need to maintain records for a significant period of time. However, when we consider information is no longer required, we will remove any details that identify you or we will securely destroy the record.

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

At the time of engagement with SSP, you agree that we will continue online communication for the purposes of providing you updated information regarding the services we provide. SSP's policy is to use personal information for the main business purpose for which it was collected.

This may include:

- to conduct our business;
- to provide and market our services;
- to communicate with you;
- to comply with our legal obligations;
- to manage our relationship with you;
- to give you ongoing information or opportunities that we believe may be relevant to your social media needs; and
- to help us manage and enhance our services. SSP will not use or disclose personal information for direct marketing purposes, unless:
  - you would reasonably expect us to use such information for that purpose;
  - we have provided a simple method by which you can request not to receive direct marketing communications from us; and
  - you have not made such a request to us.

### **Will personal information be given to anyone else?**

SSP will not share with, rent, sell or otherwise disclose your personal information to any other company or organisation without your consent. At times, however, it is necessary for us to disclose your personal information to other persons or organisations. However, we will only disclose your personal information where we are allowed to by law and have your express or implied consent, or where we are obliged to by law.

You can give express consent verbally or in writing. Implied consent is where we have reasonably assumed you have given consent from your conduct. For example, consent can be implied when a person continues with a telephone conversation after being informed the telephone conversation may be recorded for training purposes.

Where SSP discloses personal information to organisations that perform specific essential services for us, we limit this disclosure to the information they need to perform that service. Depending upon the products/services we are providing to you, SSP may disclose personal information to, for example (but not limited to):

- authorised representatives of SSP;
- payment systems operators;
- regulatory bodies, government agencies and law enforcement bodies;
- agents acting on your behalf;
- other companies or individuals who assist us in providing services and;
- anyone else you may authorise us to disclose this information to. Generally, where reasonably practicable, we require organisations or persons outside of SSP who handle personal information as service providers to SSP to acknowledge the confidentiality of the information, undertake to respect any individual's right to privacy and comply with the Australia Privacy Principles and this Policy.

SSP does not provide any personal information to third parties located overseas. If it does so, SSP's policy is to comply with the requirements of the Privacy Act that apply to cross border disclosures of personal information, as well as with any legal requirements applicable in the relevant jurisdiction.

### **Collection of other information**

When you visit SSP's website, some of the information that is collected about your visit is not personal information, because it does not reveal your identity.

### **Security of personal information**

SSP will take all reasonable steps to keep your personal information confidential and to protect it from misuse, unauthorised access, modification or disclosure. We have implemented and will maintain current standards of technology and operational security to protect your personal information from any such interference. We hold personal information in a number of ways, including in electronic databases, email contact lists, and in paper files held in drawers and cabinets, locked where appropriate. Paper files may also be archived in boxes and stored offsite in secure facilities. SSP's policy is to take reasonable steps to:

- make sure that the personal information that SSP collects, uses and discloses is accurate, up to date and complete and (in the case of use and disclosure) relevant; and
- protect the personal information that SSP holds from misuse, interference and loss and from unauthorised access, modification or disclosure.

The steps we take to secure the personal information we hold include security (such as encryption, firewalls, anti-virus software and login and password protection), secure office access, and training and workplace policies. While SSP strives to protect the personal information and privacy of website users, we cannot guarantee the security of any information that you disclose online and you disclose that information at your own risk. If you are concerned about sending your information over the internet, you can contact SSP by telephone or post.

You can also help to protect the privacy of your personal information by keeping passwords secret and by ensuring that you log out of the website when you have finished using it. In addition, if you become aware of any security breach, please let us know as soon as possible.

Links to third party websites that are not operated or controlled by SSP may be provided for your convenience. SSP is not responsible for the privacy or security practices of those websites, which are not covered by this Privacy Policy. Third party websites should have their own privacy and security policies, which we encourage you to read before supplying any personal information to them.

### **Liability**

The client profiles are created by SSP based on information provided by you the client. We do not take any liability for any information that is incorrect. The profiles created by SSP are updated online only following written or verbal approval from the client.

SSP are not liable for any content that has been approved by you. We are not liable for any changes made to the profiles after the services of SSP have ceased.

## **Opting Out**

Where you have consented to receiving direct marketing communications from SSP, your consent will remain current until you advise us otherwise. However, you can opt out at any time, in the following ways:

- send a letter to;  
Strategic Social Profiles,  
PO Box 2218,  
Fortitude Valley, Qld 4006;
- or send an email to [info@strategicsocialprofiles.com.au](mailto:info@strategicsocialprofiles.com.au)
- using social media opt out options from future communications

## **Complaints and the complaint process**

If you have any questions about this Privacy Policy, the practices of SSP website or your dealings with SSP, or if you wish to lodge a complaint, please send an email to [info@strategicsocialprofiles.com.au](mailto:info@strategicsocialprofiles.com.au) .

SSP will endeavour to answer your complaint within 7 working days. If your complaint cannot be resolved at the first instance, we will ask you to complete a Privacy Complaint Form, which details (for example) the date, time and circumstances of the matter that you are complaining about, how you believe your privacy has been interfered with and how would you like your complaint resolved.

We will endeavour to acknowledge receipt of the Privacy Complaint Form within five business days of receiving it and to complete our investigation into your complaint in a timely manner.

This may include, for example, gathering the facts, locating and reviewing relevant documents and speaking to relevant individuals. In most cases, we expect that complaints will be investigated and a response provided within 30 days of receipt of the Privacy Complaint Form. If the matter is more complex and our investigation may take longer, we will write and let you know, including letting you know when we expect to provide our response. Our response will set out:

- Whether, in our view, there has been a breach of this Privacy Policy or any applicable privacy legislation; and
- What action, if any, SSP will take to rectify the situation.

If you are unhappy with SSP's response, you can refer your complaint to the Office of the Australian Information Commissioner. Enquiries If you have any questions about privacy-related issues please contact SSP on +61 467 190037 or 0433 912215.

## **Review of policy**

From time to time, SSP may revise this Privacy Policy and we suggest that you should periodically review our current Privacy Policy to inform yourself of any change. SSP will not send you any separate notification of changes to its Privacy Policy.