

GRIFFIN LEGAL PRIVACY POLICY

Griffin Legal Pty Limited (**Griffin Legal, Us, We, Our**) is committed to providing Total Quality Services to You. This Privacy Policy outlines Our ongoing obligations to You in respect of how We collect and handle Your personal information when You access our website, services and otherwise engage with Us. You can download a copy of this Privacy Policy from Our website or You can request a free hard copy of this Privacy Policy by contacting Us directly.

This Privacy Policy may be updated from time to time and the latest version is on Our website.

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1. INTRODUCTION

- 1.1. Griffin Legal is committed to protecting the privacy of individuals and must comply with the *Privacy Act 1988* (**the Act**) and the Australian Privacy Principles (**APPs**). The Act regulates how Griffin Legal can collect, hold, use, disclose, and dispose of personal information, and how You can access and correct personal information We hold about You.
- 1.2. Personal information is information or an opinion about an individual who is identified or reasonably identifiable, whether true or not and whether recorded in a material form or not.
- 1.3. Sensitive information is a subset of personal information that includes information relating to health, racial or ethnic origin, political opinions, association memberships, religious beliefs, sexual orientation, criminal history, generic or biometric information. Sensitive information is afforded greater protections under the Privacy Act.
- 1.4. The Privacy Act only applies to information about individuals, not to information about corporate entities such as businesses, firms or trusts. Detailed information on the



Privacy Act can be found on the Office of the Australian Information Commissioner (OAIC) [website](#).

2. REMAINING ANONYMOUS OR USING A PSEUDONYM

2.1. Generally, it is not possible for You to remain anonymous or adopt a pseudonym for Griffin Legal to interact with You effectively.

3. PERSONAL INFORMATION WE COLLECT AND HOW WE HANDLE IT

3.1. The personal information Griffin Legal will collect from You will vary depending on Your interaction with Us.

3.2. The personal information You provide enables Us to contact You and effectively carry out Our business functions and activities.

3.3. The following table outlines who We collect personal information from, the types of personal information We collect and the purposes for which We may use and disclose the personal information.

Whose personal information do We collect?	What personal information do We collect and hold?	How do We use and disclose the personal information?
Prospective client	<ul style="list-style-type: none"> Information provided by the individual (including name, contact details, occupation, employer, bank account and credit card details, signature, communication preferences, political views, memberships of organisations and health information) Information about client matters, including name, contact information, information about relevant incidents relating to third parties related to the matter, such as the other party/parties, which is collected from our client of their advisors. 	<ul style="list-style-type: none"> To provide services To administer interactions and transactions To provide information to those that engage with Us To keep clients informed of news and information relating to Our legal services and offerings To protect the security of Our offices, staff, clients and the property held on Our premises To comply with corporate governance, reporting and legal obligations
Client		
Employee, contractor or individual otherwise engaged by/with Our client		
Individuals involved in a client matter, such as the other party in a matter and representatives/lawyers acting for the other party in a matter		

<p>Prospective employee</p>	<ul style="list-style-type: none"> • Information provided by the individual (including job application and referees) • Information provided on behalf of the individual (such as an authorised representative or recruitment agency) • Information provided by other parties (such as current or former employer, colleagues, government agencies) 	<ul style="list-style-type: none"> • To recruit staff and contractors • To comply with corporate governance, reporting and legal obligations
<p>Reference for prospective employee</p>	<ul style="list-style-type: none"> • Referee report (including name, occupation, employer, contact details) 	
<p>Current and former employee</p>	<ul style="list-style-type: none"> • Personnel record (including name, date of birth, proof of identity, gender, contact details, signature, country of residency, qualifications and accreditations, tax file number, right to work in Australia and visa conditions, bank account details, employment details) • Information provided by other parties (including colleagues, government agencies such as the Australian Electoral Commission, or Services Australia) • Security clearance • Criminal history check 	<ul style="list-style-type: none"> • To manage the employment relationship • To protect the security of Our offices, staff, clients and the property held on Our premises • To comply with corporate governance, reporting and legal obligations
<p>Supplier of goods and services</p>	<ul style="list-style-type: none"> • Information provided by the individual (including name, contact details, occupation, employer) 	<ul style="list-style-type: none"> • To enable third parties engaged by Us to provide services on Our behalf • To manage relationships with suppliers • To comply with corporate governance,
<p>Individual who works with one of Our suppliers</p>		

		reporting and legal obligations
<p>Individual who:</p> <ul style="list-style-type: none"> • contacts and has dealings with Our employees or office; • submits an enquiry, including through Our website; • registers for or attends Our events or seminars; • subscribes to Our newsletters; or • otherwise sends or provides Us personal information 	<ul style="list-style-type: none"> • Information provided by the individual (including name, contact details) 	<ul style="list-style-type: none"> • To administer interactions with Us and provide information to those that engage with Us • To keep clients and interested parties informed of news and information relating to Our legal services and offerings • To administer, manage and provide access to Our website and resources • To facilitate events and programs including sending invitations • To protect the security of Our offices, staff, clients and the property held on Our premises • To comply with corporate governance, reporting and legal obligations
<p>Individual who:</p> <ul style="list-style-type: none"> • contacts the Sport Integrity Australia SafeSport Hotline (Hotline) to make a report; or • is associated with a report to the Hotline 	<ul style="list-style-type: none"> • Information provided by the individual making a report to the Hotline (including names and contact details of the caller, witnesses and related parties, membership details, details of any disability, ethnicity, details of integrity issue or discrimination) 	<ul style="list-style-type: none"> • To operate the Hotline • To refer high-risk matters to the relevant law enforcement agencies and/or child protection agencies • To refer callers to specialist support services where necessary • To provide call information directly to Sport Integrity Australia • To provide Sport Integrity Australia with reports which outline call volumes, response times, themes of calls, action taken and other items as required



- 3.4. On occasion, sensitive information may also be collected or held about You, including:
- (a) racial or ethnic origin;
 - (b) health information;
 - (c) political opinions or associations;
 - (d) religious beliefs or affiliations;
 - (e) philosophical beliefs;
 - (f) professional or trade union memberships or associations;
 - (g) sexual orientation or practices; or
 - (h) criminal record.
- 3.5. We only collect sensitive information where it is reasonably necessary for Our functions and activities and either:
- (a) You have consented to the collection; or
 - (b) We are required or authorised by law to collect Your sensitive information.

Sport Integrity Australia SafeSport Hotline

- 3.6. We are supporting Sport Integrity Australia to operate the dedicated SafeSport Hotline (1800 161 361) between 7am to 7pm, 7 days a week, 365 days a year to allow people to report integrity issues in sport. Callers may report concerns they have anonymously. The personal information collected will be managed in accordance with this Privacy Policy and disclosed to SIA for them to manage in accordance with their Privacy Policy.

4. HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

- 4.1. In most cases Griffin Legal will collect information from You directly. This may be via Our website, in person, email, online and written forms, phone calls, verbal conversation or other forms of correspondence, writing or recording.
- 4.2. We may also collect Your personal information via the following third parties:
- (a) our clients;
 - (b) the solicitors acting for other parties in a matter where we act for a client;
 - (c) third parties that assist Us in running programs, events, or Our functions and activities;
 - (d) Government agencies such as the Australian Electoral Commission;
 - (e) Your current or former employer;
 - (f) Your colleagues;
 - (g) Your authorised representative;
 - (h) agents, including real estate agents, or other professional service providers, such as accountants, when they refer You to Us;
 - (i) publicly available sources;
 - (j) regulators; and
 - (k) any other government or law enforcement bodies where required by law.



- 4.3. From time to time, We may obtain personal information from other third parties where it is impractical to obtain it directly from You. When We do so, We will take reasonable steps to ensure that We make You aware of the collection of Your personal information in accordance with the Act.
- 4.4. In some circumstances, We may collect and handle personal information of an individual who has not had direct dealings with Us. For example, where We act for one party to a transaction and receive personal information relating to the other party to the transaction, which may be provided by Our client or the other party's solicitor.
- 4.5. If We receive unsolicited Personal Information about You, it will be handled in accordance with the Act. We may keep a record of unsolicited personal information if permitted by the Act. If not, Our policy is to destroy or de-identify the personal information as soon as practicable, provided it is lawful and reasonable to do so.

5. WHY DO WE USE AND DISCLOSE YOUR PERSONAL INFORMATION?

- 5.1. Griffin Legal will generally only use or disclose Your personal information for the purposes for which it was collected.
- 5.2. We may use or disclosure of Your personal information for another purpose where:
 - (a) You have provided consent;
 - (b) You would reasonably expect Us to use or disclose Your personal information for another purpose that is related to (or for sensitive information, directly related to) Our primary purpose of collection;
 - (c) authorised or required under law; or
 - (d) some exception otherwise exists in the Act.
- 5.3. We do not sell Your personal information to third parties.

6. HOW DO WE STORE AND SECURE YOUR PERSONAL INFORMATION?

- 6.1. Griffin Legal takes reasonable steps to protect Your personal information. In the event of a data breach, We are committed to complying with the requirements of the Act to the extent required at law.
- 6.2. Personal information may be stored in hard copy or electronic format in secure facilities that We own and operate, or that are owned and operated by Our service providers. Our service providers may store personal information overseas.
- 6.3. Our electronic databases are secured by a firewall and anti-virus software to ensure, so far as practicable, that it is not accessed by unauthorised parties. Our website has security measures designed to protect against loss, misuse, or alteration to Your personal information under Our control.
- 6.4. We take reasonable steps to ensure that any software that stores Your personal information has appropriate security and policy measures to ensure Your personal information is not subject to loss, misuse, interference, or unauthorised access, modification or disclosure.
- 6.5. We take steps to destroy information relating to a client's matter at a date after seven years since the conclusion of their matter with Us. Exceptions to this are where We are



required to store a client's matter for a longer period of time or where We are provided documents to store on Our client's behalf, such as a will or power of attorney.

7. HOW CAN YOU ACCESS OR CORRECT YOUR PERSONAL INFORMATION?

- 7.1. Please contact Our Privacy Officer (details below) if You would like to access or correct the personal information that We hold about You. Additionally, We may be able to delete the personal information We hold about You in some cases. We may request that You verify Your identity before We process any request, to preserve the security of the personal information We hold.
- 7.2. We may charge a reasonable fee for providing You with access to Your personal information, which will be confirmed at the relevant time.
- 7.3. If We refuse to provide You with access or to correct Your personal information, We will provide You with written notice setting out Our reasons and inform You of how to complain about the refusal.

8. HOW CAN YOU MAKE COMPLAINTS OR ENQUIRIES?

- 8.1. If You have a complaint about how Griffin Legal has collected and handled Your personal information, please contact Our Privacy Officer who will endeavour in the first instance to deal with Your complaint and take any steps necessary to resolve the matter.
- 8.2. If We are unable to resolve Your complaint, or if You are unhappy with the outcome, You may lodge a complaint with the OAIC (see [here](#) for further information).
- 8.3. For any queries about the personal information We hold about You or the way We handle personal information, please contact Our Privacy Officer.

9. DO WE DISCLOSE YOUR PERSONAL INFORMATION OVERSEAS?

- 9.1. Griffin Legal may disclose Your personal information to overseas parties where secured cloud services are used from time to time or where Your details are provided to an overseas direct marketer to send marketing material to You (such as Mailchimp). Our suppliers may disclose personal information overseas.
- 9.2. If We disclose personal information overseas, We take reasonable steps to ensure that any overseas recipient does not breach the Act.
- 9.3. Where We disclose Your personal information overseas it will in most cases be to companies and storage facilities located in the United States. We will continue to update our Privacy Policy to reflect the countries to which We disclose personal information.
- 9.4. If You require that We do not disclose Your personal information overseas, please let Us know and We will take reasonable steps to attempt to facilitate Your request.

10. ONLINE FUNCTIONALITY

- 10.1. Griffin Legal may collect the following information through Our website, either Ourselves or through Google Analytics (which is hosted by a third party):
 - (a) Your computer or device's IP address (collected and stored in an anonymised format);
 - (b) device screen size;



- (c) device type, operating system and browser information;
- (d) geographic location (country only);
- (e) referring domain and out link if applicable;
- (f) search terms and pages visited (clickstream data); and
- (g) date and time when website pages were accessed.

10.2. We will treat any personal information collected through Our website in the same way as other personal information We collect.

10.3. A cookie is a piece of data sent from a website and stored in a user's web browser. We may collect cookies to understand how online services are used. We may use cookies for several reasons, including utilising cookies to remember Your log-in status and viewing preferences from a previous use of an online service.

10.4. Our website may also transfer cookies on computers and devices that access Our website for record-keeping purposes. You may be able to change Your browser preferences to reject all cookies before accessing Our website.

10.5. Our website contains links or references to other websites or organisations. We are not responsible for the privacy practices or content of linked third parties websites. Third party websites may have their own privacy and security policies, which we encourage You to read before supplying any personal information to them.

10.6. We use social media networks, including Facebook, LinkedIn, Instagram and Twitter, to communicate with the public. When You communicate with Our social media platforms, We may collect Your personal information, for the purpose of using it to communicate with You and the public. The social media webpages may also collect and handle Your personal information for its own purpose. We recommend You consider the privacy policies of these social media websites prior to using the same.

11. GET IN TOUCH

11.1. If You have any questions about how We collect or handle Your personal information, or if You would like to access or correct the personal information We hold about You, please get in touch using the below details.

The Privacy Officer

Griffin Legal

Mail: GPO Box 1789, Canberra City ACT 2601

Phone: (02)6198 3100

Email: griffinlegal@griffinlegal.com.au