



February 2023

## **PEACH CONSULTING PRIVACY POLICY**

This policy concerns the collection and use of personal information by all members of Peach Consulting operating in Australia. PEACH CONSULTING recognises the importance of an individual's privacy. The Privacy Act 1988 and, where applicable, the European Union General Data Protection Regulation 2016/679 (GDPR) set out principles that PEACH CONSULTING is committed to meeting and exceeding.

### **Collection of Personal Information**

PEACH CONSULTING only collects personal information that is necessary for the marketing and delivery of the services PEACH CONSULTING provides. Wherever possible PEACH CONSULTING collects personal information from the individual to whom the information relates.

### **Use and Disclosure of Personal Information**

PEACH CONSULTING uses the personal information it collects to communicate with its clients and market its services to clients and potential clients. PEACH CONSULTING may share your personal information to its suppliers insofar as reasonably necessary for the purposes of hosting, email broadcasting, conducting financial transactions or sales forecasting.

Information collected in relation to job applicants may be used when considering making offers of employment.

Otherwise, except as expressly contemplated in our Credit Reporting Policy, PEACH CONSULTING will not disclose your personal information to any other person unless we are otherwise required or authorised to do so by law.

We will not transfer personal information to any third party that is not part of the Peach Consulting located overseas without the consent of the person to whom the information relates and otherwise in compliance with our obligations under the Privacy Act.

PEACH CONSULTING will take reasonable steps to ensure that any personal information we hold is kept secure and not used for any unauthorised purpose. We will also destroy or de-identify any personal information we hold if it is no longer needed.

Where PEACH CONSULTING has collected personal data subject to the provisions of the GDPR, the following will apply:

### **Retaining and Deleting Personal Data**

Personal data that PEACH CONSULTING process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

PEACH CONSULTING will retain your personal data for a period of 2 years following last use or update by you.

Notwithstanding the other provisions of this section, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

### **Security of Personal Data**

PEACH CONSULTING will take appropriate technical and organisational precautions to secure your personal data and to prevent the loss, misuse or alteration of your personal data.

PEACH CONSULTING will store all your personal data within the PEACH CONSULTING server, encrypted and protected by firewalls and security technologies and procedures consistent with current industry practice.

You acknowledge that the transmission of unencrypted (or inadequately encrypted) data over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

### **Your Rights**

You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to

erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

To the extent that the legal basis for our processing of your personal data is: consent or that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

You may exercise your rights in relation to your personal data by contacting PEACH CONSULTING's privacy officer at [peachconsulting.com.au](mailto:peachconsulting.com.au). PEACH CONSULTING aims to respond to any complaint within 30 days and act reasonably in resolving all complaints.

### **Cookies**

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

We use cookies to enhance your user experience on our website. We do not collect or use cookies for marketing purposes.

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can obtain up-to-date information about blocking and deleting cookies via your browsers help files.

Blocking all cookies will have a negative impact upon the usability of many websites and you may not be able to use all the features on our website.

### **Access to and Correction of Information**

If you wish to obtain a copy of any personal information we hold, you may request that we correct that information, request that we delete that information, or make a complaint relating to our collection or use of that information. Please contact the privacy officer at [peachconsulting.com.au](mailto:peachconsulting.com.au). PEACH CONSULTING aims to respond to any complaint within 30 days and act reasonably in resolving all complaints.