

Sullivans Legal Co: Privacy Notice

Introduction

This notice applies across all services we provide and all websites we operate. For the purpose of this notice, we'll call them our 'services'.

When we say 'personal information', we mean identifiable information about you, like your name, email, address, telephone number, employment history, bank account details, payment information, and so on.

When we say "we" (or 'our' or 'us'), that means Gabrielle Sullivan & Associates Solicitors Pty Ltd t/as Sullivans Legal Co.

Our principles of information protection

Your privacy is important to us. We will work hard to ensure your personal information is kept safe and secure and is only used as you would reasonably expect it to be used.

The kinds of personal information we might collect

As a law firm, the kinds of personal information we might collect about you include:

- your name;
- date of birth;
- occupation;
- contact details, including postal and residential address, email address and telephone number(s);
- income, bank account details and tax file numbers;
- the content of any communications between you and us; and
- other personal information reasonably necessary for a purpose referred to in this notice.

We understand that some personal information is extra-sensitive, like your ethnic origin, beliefs, sexual orientation, criminal history, health, genetics and membership of political or trade associations. We call this subset of personal information 'sensitive information'. We have additional protections when handling your sensitive information. You can read more about this below.

How we collect personal information

We will only collect your personal information by lawful and fair means, and only where that information is reasonably necessary for a purpose set out below.

Usually, we only collect personal information with your consent – such as when you give us information directly about you so that you can access our services, websites, social media etc. If you don't want to provide us with your personal information, you don't have to, but it might mean you can't use some parts of our services, websites or social media (etc).

We may collect some information about you automatically when you visit our websites or use our services, like your IP address and device type. We also collect information when you navigate through our websites and services, including what pages you looked at and what links you clicked on.

Sometimes we might collect personal information about you from other sources, such as publicly available materials or trusted third parties (where it is unreasonable to get that information from you first). We use this information to supplement or verify the personal information we already hold about you, in order to better inform our services to you.

Where we collect personal information, we'll only use or share it:

- for a purpose set out below; or
- where we have legitimate interests to process the personal information (guided by this policy) and that is not overridden by your rights, or
- to comply with a legal obligation, or
- where we have your consent.

How we use your personal information

Our core purpose in using your personal information is to provide you with the legal services you've requested, and to manage our relationship with you. (We also collect personal information of prospective employees to consider making them an offer of employment).

We may also use your personal information for other related purposes, which may include the following:

- **To communicate with you.** We may contact you through a variety of channels, but will try to respect your preferred communication preferences.
- **To make invitations to you:** We may send you marketing communications for events or services we think may be of interest to you.
- **To report:** We may use the personal information we collect about you and other users of our services (whether obtained directly or from third parties) to produce aggregated reports, which we may share publicly or with third parties. Any such reporting will be de-identified.

As a law firm, it is usually impractical for us to deal with you as a client if you do not identify yourself sufficiently.

How we can share your personal information

There will be times when we need to share your personal information with others. We will only disclose your personal information to:

- other companies in the Gabrielle Sullivan & Associates Solicitors Pty Ltd group of companies;
- third party service providers and partners (for examples agents, barristers etc), who assist and enable us to use the personal information to, for example, support delivery of our services, or to market or promote our services to you. We will not share your mobile telephone number or SMS opt-in consent status with these third parties to use for their own marketing purposes without your explicit consent;
- regulators, law enforcement bodies, government agencies, courts or other third parties where we think it's necessary to comply with applicable laws or regulations, or to exercise, establish or defend our legal rights. Where possible and appropriate, we will notify you of this type of disclosure;
- an actual or potential buyer (and its agents and advisors) in connection with an actual or proposed purchase, merger or acquisition of any part of our business; or
- other people where we have your consent.

How we collect, use and share sensitive information

We will only collect, use or share sensitive information with your consent, and where this collection is reasonably necessary for one of the purposes set out above.

(There are a few exceptions to this. Consent is not required to collect sensitive information where the collection of that information is required or authorised by or under any Australian law or a court order, or where a 'permitted general situation' exists. The conditions which give rise to a permitted general situation are defined under the *Privacy Act 1988 (Cth)* and include where collection, use or disclosure of sensitive information is necessary to:

- lessen or prevent a serious threat to the life, health or safety of any individual, and it is unreasonable or impracticable to obtain the consent;
- allow us to take appropriate action in relation to suspected unlawful activity or serious misconduct

- assist in locating a person who has been reported missing; or
- establish, exercise or defend a legal or equitable claim.

If we collect your tax file number, then the storage, use and sharing of the tax file number will only occur in the manner the law requires.

International information transfers

When we share personal information, it may be transferred to, and processed in, countries other than the country you live in – such as New Zealand, where our legal practice management software provider's servers are located. These countries may have laws different to what you're used to. Our international software providers have safeguards in place to ensure your personal information remains protected.

Security

Security is a priority for us when it comes to your personal information. We're committed to protecting your personal information from misuse, interference, and loss, and from unauthorised access, modification or sharing. We will do this in a commercially acceptable manner, and we have appropriate technical and organisational measures in place help us (though of course, we cannot guarantee absolute data security). Personal information is stored in electronic format on a secure cloud-based data base. Hard copy documents will only be collected in limited circumstances and will be securely stored in physical file(s) at our business premises.

Retention of information

We'll retain your personal information for as long as we have a contractual relationship with you, and for 7 years after that. We need to keep your personal information for this long to comply with laws like business records and tax laws, and for insurance purposes. Following that period, we'll make sure it's deleted or anonymised.

Your rights

It's your personal information and you have certain rights relating to it. When it comes to any marketing communications, you can ask us not to send you these at any time – just follow the unsubscribe instructions contained in the marketing communication or send us a note.

You also have rights to:

- know what personal information we hold about you, and to make sure it's correct and up to date
- request a copy of your personal information, or ask us to restrict processing your personal information or delete it
- object to our continued processing of your personal information

You can exercise these rights at any time by making a request to us.

If you're not happy with how we are processing your personal information, please let us know by getting in touch. We will review and investigate your complaint and try to get back to you within a reasonable time frame. You can also complain to your local information protection authority. They will be able to advise you how to submit a complaint.

How to contact us about privacy matters

If you have any questions about privacy, please email us at reception@sullivanlegal.com.au, and mark your email "Attention: Privacy Officer".