



PRIVACY POLICY

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1. Policy Commitments

From time to time, Northern Edge Studio is required to collect, hold, use and/or disclose personal information relating to individuals (including, but not limited to, its customers, contractors, suppliers and employees) in the performance of its business activities.

This document sets out Northern Edge Studio's policy in relation to the protection of personal information, as under the Privacy Act 1998 (Cth) (or the 'Act') and the Australian Privacy Principles ('APP').

Details for individual projects and clients can be found in the "Client Architect Agreement" which is provided to and signed by clients before the commencing of any work by Northern Edge Studio.

2. Definitions

According to the Privacy Act, personal information means information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable.

3. Objectives

Northern Edge Studio collects personal information that is reasonably necessary for one or more of its functions or activities.

The type of information that Northern Edge Studio collects and holds may depend on the person's relationship with the company. This may include but is not limited to information on candidates, clients, suppliers, and referees.

Northern Edge Studio may:

1. For candidates seeking employment, collect and hold information including their name, address, email address, contact telephone number, gender, age, employment history, references, resume and qualifications
2. For clients (including potential inquiries, information including a client's name, address, email address, contact telephone number, gender and age.
3. For suppliers, information including their name, address, email address, contact telephone number, business records, billing information, and information about goods and services provided.
4. For referees of candidates being considered for, information including their name, contact details, current employment information and professional opinion of the candidate.
5. Northern Edge Studio will only collect sensitive information where consent has been obtained, and when the information is reasonably necessary for one or more of the company's functions or activities. Sensitive information includes, but is not limited to, information or an opinion about racial or ethnic origin, political opinions, religious and/or philosophical beliefs, membership of a trade union, sexual preferences, criminal record, health information or genetic information. It is optional for individuals to supply sensitive information.



4. Collection and Storage of Information

Northern Edge Studio must collect personal information only by lawful and fair means. The company will collect personal information directly from the individual, if it is reasonable or practicable to do so.

Northern Edge Studio may collect personal information in a number of ways, including without limitation:

- Through application forms
- By email or other written mechanisms
- Over a telephone call
- In person
- Through transactions
- Through the company website
- Through council websites
- By technology used to support communication:
 - through publicly available information sources (which may include telephone directories, the internet and social media sites)
 - direct marketing database providers.

When Northern Edge Studio collects personal information through publicly available information sources, it will manage such information in accordance with the APPs.

Unsolicited Personal Information is personal information that the company receives, which it did not solicit. Unless the company determines that it could have collected the personal information in line with the APPs or the information is contained within a Commonwealth record, it must destroy the information to ensure it is de-identified.

Physical documentation related to working projects (such as floorplans, specifications, etc) will be stored in the office location of Northern Edge Studio. These documents are for office use and are only accessible to employees, or under the supervision of employees. When an employee is not present, these documents are secured in the locked office. These documents are accessible to relevant parties upon request.

Documentation may be kept and archived or disposed of upon finalisation of services for a project as required by law. Northern Edge Studio will return all documentation not required to store by law upon ceasing services. Any documentation left will be considered property of Northern Edge Studio unless previously discussed and may be disposed of.

5. Purposes for Collecting, Holding, Using and/or Disclosing Personal Information

Northern Edge Studio will collect personal information if it is reasonably necessary for one or more of its functions or activities.

The main purposes Northern Edge Studio collects, holds, uses and/or discloses personal information may include but are not limited to:

- Recruitment
- Customer service management
- Training and events
- Marketing purposes
- Legal requirements and legislation
- Surveys and general research
- Business relationship and project management

The company may also collect, hold, use and/or disclose personal information if consent is obtained, or if required or authorised under law.



Individuals can opt out of receiving direct marketing communications from Northern Edge Studio unsubscribing appropriately or contacting the office admin.

6. Disclosure of Personal Information

Northern Edge Studio may disclose personal information for any of the purposes for which it was collected or where it is under a legal duty to do so.

Disclosure will usually be internally and to related entities or to third parties such as contracted service suppliers.

Before the company discloses personal information about an individual to a third party, it will take steps as are reasonable in the circumstances to ensure that the third party does not breach the APPs in relation to the information.

7. Access to Personal Information

If Northern Edge Studio holds personal information about an individual, they may request access to that information by making a written request to the privacy officer. The company will respond to any request within a reasonable period; a charge may apply for giving access to the personal information.

There are certain circumstances in which the company may refuse to grant access to the personal information.

In such situations, the company will give the requestor written notice that sets out:

- The reasons for the refusal; and
- The mechanisms available to make a complaint.

Reasons for refusing to grant access to personal information can include but are not limited to:

- Situations when providing the information could cause threat to the life, health or safety of the individual or an associated individual;
- Circumstances where it is unlawful to do so; and/or
- Where the information relates to an existing or anticipated legal proceeding
- Where there has been a request for privacy by the affected party and the request does not come with any legal obligation

8. Correction of Personal Information

If Northern Edge Studio holds personal information that is inaccurate, out-of-date, incomplete, irrelevant or misleading, it must take steps as are reasonable to correct the information.

If Northern Edge Studio holds personal information and the individual makes a written to correct the information, the company must take steps as are reasonable to correct the information.

There are certain circumstances in which the company may refuse to correct the personal information. In such situations, the company will give the requestor written notice that sets out:

- The reasons for the refusal; and
- The mechanisms available to make a complaint.

If Northern Edge Studio corrects personal information that has previously been supplied to a third party, the requestor can ask that the third party be notified of the correction. The company will take such steps as are reasonable to give that notification unless impracticable or unlawful to do so.



9. Integrity and Security of Personal Information

Northern Edge Studio will take such steps (if any) as are reasonable in the circumstances to ensure that the personal information that it collects is accurate, up-to-date and complete. It will also ensure that the personal information that it uses or discloses is, having regard to the purpose of its use, accurate, up-to-date and complete.

Northern Edge Studio will take steps as are reasonable in the circumstances to protect the personal information from misuse, interference, loss and from unauthorised access, modification or disclosure.

If the company holds personal information that it no longer needs to be used or disclosed, is not contained in any Commonwealth record, and the company is not required by law to retain the information, it will take such steps as are reasonable in the circumstances to destroy the information or to ensure it is de-identified.

10. Notification of Data Breaches

In the occurrence of a data breach, Northern Edge Studio is bound to notify those impacted by the breach. A data breach is classified as:

- Unauthorised access or disclosure of information that a reasonable person would conclude is likely to result in serious harm to individuals to whom the information relates; or
- information that is lost in circumstances where unauthorised access or disclosure of information is likely to occur and it can be reasonably concluded that such an outcome would result in serious harm to any of the individuals to whom the information relates.

If there are reasonable grounds to believe there has been an eligible data breach, Northern Edge Studio will notify the Australian Information Commissioner and the individual(s) whose data was affected with:

- a description of what occurred
- the kinds of information concerned; and
- the recommended next steps that individuals affected should take in response to the data breach.

Failure to provide notification of a data breach would be considered a breach of the Privacy Act.

10.1 Usage of Third-Party Software

Northern Edge Studio employs the use of third-party software for data storage. This includes but is not limited to Xero, Dropbox, and Wordpress.

Northern Edge Studio has taken all reasonable steps to protect ourselves and clients from any breaches through these third-party software, including the use of two factor authentication and regular maintenance. As such, in the occurrence of a data breach to any of the third-party software in use, Northern Edge Studio can not be held liable for those impacted.

11. Responsibilities

Managers and principals are accountable for enforcing this policy; however, all employees have a responsibility to adhere to the policy at all times. All breaches of the policy will be dealt with in accordance with the Northern Edge Studio's Working Practices Policy.

Breaches may result in disciplinary action, which in serious circumstances may include termination or prosecution.



12. Application

This policy applies to Northern Edge Studio and New Northern.

Northern Edge Studio provides this policy to all staff, contractors, sub-contractors, and interested parties upon request.

13. Scope

The version of this policy applies from the sign-off date.

It replaces all previous versions and should be read in conjunction with all current policies and procedures and relevant legislation. Queries in regard to content of this policy are to be referred to the principals.

This policy will be reviewed regularly, and modified as required, to reflect changes in company policy, best practice, and compliance with the relevant legislation