



## Imagination (Australia) Pty Ltd Privacy Policy

### 1. INTRODUCTION

**1.1** This privacy policy (**Privacy Policy**) sets out the ways in which Imagination (Australia) Pty Ltd (ACN 099 809 319) (**we, us, our**), collect and use your personal information in connection with our businesses. Personal information is information about you, such as your name, contact details and records of your dealings with us. It may include sensitive information, such as information about your racial or ethnic origin, membership of a professional or trade organisation, criminal background or health information. This policy also explains what rights you have to access or correct your personal information.

**1.2** This Privacy Policy and our procedures have been developed in line with the requirements of the Australian Privacy Principles as set out in the *Privacy Act 1988* (Cth) and other applicable national law (**Privacy Law**).

**1.3** Where we refer to 'website' in this Privacy Policy we are referring to the website at [www.imagination.com](http://www.imagination.com)

### 2. ABOUT US

**2.1** Imagination (Australia) Pty Ltd is registered in New South Wales, Australia with Australian Company Number 099 809 319. Our registered address is set out below.

**2.2** You can **contact us** as follows:

Address: SUITE 116 26-32 PIRRAMA ROAD PYRMONT NSW 2009

Email: [privacy@imagination.com](mailto:privacy@imagination.com)

### 3. INFORMATION WE MAY COLLECT ABOUT YOU

#### 3.1 Information that you provide to us

**3.1.1** We will collect any information that you provide to us when you:

- (a) make an enquiry about our services via email, telephone, post or via our social media channels or visit one of our premises or sites;
- (b) subscribe to our mailing lists and newsletters via the website;
- (c) as a client, ask us to provide services to you (or you work for someone who we provide services to); and
- (d) as a supplier, provide goods or services to us (or you work for someone who supplies goods or services to us).

**3.1.2** The information you provide to us might include your name, address, email address, phone number, job title and other additional details on your licence or other form of identification (**ID**).

#### 3.2 Information we collect about you

**3.2.1** We will collect any information contained in any correspondence between us. For example, if you contact us by email or telephone, we will keep a record of it.



**3.2.2** We use CCTV to maintain the security of our premises and sites, prevent and investigate crime, and in the interests of health and safety. The images captured are securely stored and only accessed where necessary (e.g. to look into an incident). CCTV recordings are typically automatically overwritten after a short period of time (no more than 30 days) unless an issue is identified that requires investigation (such as a theft).

**3.2.3** In the unlikely event that you have an accident on any of our premises or site we will also collect details of the accident in order to comply with relevant health and safety legislation.

**3.2.4** When you sign up to our e-mail newsletters, we use technology to collect information about how you interact with our emails, including whether our emails are delivered to you and whether you open them, unsubscribe from them or click on any of the links which they contain.

**3.2.5** We also use analytics tools on our website to collect anonymized and aggregated information about website visitors. This includes information about how our visitors navigate the site (including mouse movements and key presses) details of our visitors' browsers, operating systems, device screen resolutions and screen sizes, internet protocol (IP) addresses, geographic locations, time zone settings and other technology on the devices they use to access our website. We use this information for analysis purposes and, unlike the other types of information we collect from our website visitors, it cannot be used to identify individuals.

**3.2.6** When you enter or leave any of our premises or sites, we scan your ID on one of our systems. This includes your personal identifiers as well as details of when you enter and leave the premises or site.

### **3.3 Information we receive from third parties**

**3.3.1** We may be provided with your contact details if you or your services are referred or recommended to us by a third party;

**3.3.2** We use lead generation agencies who use publically available sources and dedicated databases to obtain contact details for business purposes; and

**3.3.3** In certain circumstances we may use a third-party provider to conduct due diligence on our suppliers. This may lead to us being provided with personal information relating to criminal convictions and offences (such as fraud, bribery) and other information relevant to our decision as to whether to conduct business with you or your company. This information is obtained from publicly available sources.

### **3.4 Anonymity**

**3.3.1** You generally have the right to anonymity when dealing with us or using our website, however, we may not be able to provide you with the services you request or need if you choose not to identify yourself.

**3.3.2** In the case of individuals who attend our premises or sites, we may not be able to permit you access to our premises or sites if you do not provide us with your personal information. This may have consequences in relation to your engagement with us.

## **4. HOW WE USE INFORMATION ABOUT YOU AND RECIPIENTS OF YOUR INFORMATION**

**4.1** We may use your information for the following purposes:

**4.1.1** to provide you with access to our website in a manner convenient and optimal including sharing your information with our website hosts and developers;



**4.1.2** as a client, to provide you with our services as agreed pursuant to the performance of our contract with you;

**4.1.3** to keep in contact with you about our news, events, or new services that we believe may interest you, provided that we have the requisite permission to do so, and sharing your information with our e-mail marketing services provider;

**4.1.4** if you are a supplier, to receive services from you or your organisation, for example where a supplier is providing us with IT or other outsourced services we will handle personal information about the individuals who are involved in providing the service to us;

**4.1.5** to carry out aggregated and anonymised research about general engagement with our website;

**4.1.6** to protect, investigate, and deter against fraudulent, unauthorised, or illegal activity;

**4.1.7** to enable us to comply with our policies and procedures and enforce our legal rights, or to protect the rights, property or safety of our employees and share your information with our technical and legal advisors;

**4.1.8** if you are an employee or contractor (engaged by us or our client) or visitor to one of our premises or sites, to enable us to have a record of the fact of your visit and the dates and times that you were on our premises or sites for safety and insurance purposes;

**4.1.9** to personalise, enhance, modify or otherwise improve the services and/or communications that we provide to you;

**4.1.10** to protect against fraud and other risks to our business, for example when we collect personal information in the course of carrying out due diligence on our suppliers;

**4.1.11** to ensure network and information security and the security of our premises, for example, when we use CCTV at our premises; and

**4.1.12** to ensure the safety and security of the employees, contractors and visitors to our premises and sites.

## **5. WHO WE MIGHT SHARE YOUR INFORMATION WITH**

**5.1** In connection with the purposes described above, a purpose that you would reasonably expect, a purpose that is required or permitted by law or for which you have provided consent, and in addition to the recipients of your information as described above, we may share your personal information with third parties that we work with such as:

**5.1.1** third parties who provide data processing and IT services to us including website hosting providers, data back-up, security and storage providers and cloud-based software providers;

**5.1.2** other third party service providers who help us run and improve our business, including providers of email services, marketing services, survey and market research providers, providers of fulfilment and postal services and travel service providers;

**5.1.3** any selected third party that you consent to us sharing your information with for marketing purposes;

**5.1.4** any member of our group, which includes other body corporates related to us as defined in section 50 of the *Corporations Act 2001* (Cth);



**5.1.5** third parties with whom we may choose to sell, transfer or merge parts of our business or our assets; and

**5.1.6** any other third parties (including legal or other advisors, regulatory authorities, courts and government agencies) where necessary to enable us to enforce our legal rights, or to protect the rights, property or safety of our employees or where such disclosure may be permitted or required by law.

**5.2** We generally require third parties to maintain appropriate security to protect your information from unauthorised access or processing.

## 6. COOKIES

**6.1** We use cookies to ensure that you get the most out of our website. Please find further details in our [Cookie Policy](#).

## 7. HOW WE LOOK AFTER YOUR INFORMATION AND HOW LONG WE KEEP IT FOR

**7.1** We use appropriate technological and operational security measures to protect your information against any unauthorised access or unlawful use, such as:

**7.1.1** ensuring the physical security of our premises and other sites;

**7.1.2** ensuring the physical and digital security of our equipment and devices by using appropriate password protection and encryption; and

**7.1.3** limiting access to your personal information to those in our company who need to use it in the course of their work.

**7.2** We will retain your information for as long as is necessary to provide you with the services that you have requested from us or for as long as we reasonably require to retain the information for our lawful business purposes, such as for the purposes of exercising our legal rights.

**7.3** It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

## 8. INTERNATIONAL TRANSFERS OF YOUR INFORMATION

**8.1** We are part of a global business (The Imagination Group Limited) and we use third party service providers located in other countries to help us run our business. As a result of this we may transfer personal information outside of Australia, including to the European Union and the United States. We will not transfer personal information we collect from your ID overseas unless necessary as a result of an incident on one of our premises or sites.

## 9. YOUR RIGHTS TO THE INFORMATION WE HOLD ABOUT YOU

**9.1** You have certain rights under Privacy Law in respect of the information that we hold about you:

**9.1.1 Access:** You have the right to request confirmation that we are holding your personal information and to access a copy of the personal information that we hold about you; and

**9.1.2 Correction:** You can ask us to change or complete any inaccurate or incomplete personal information we hold about you.



**9.2** In addition, in accordance with Privacy Law, you have the right to lodge a complaint about us to the Office of Australian Information Commissioner by calling 1300 363 992 or sending an email to [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au).

**9.3** Please note that we may not be able to fulfil every request. If this is the case you will be notified of this at the time of your request and we will provide you with a written notice stating our reasons for refusing access or correction and the law we rely on to refuse such access or correction. We may also seek to recover from you reasonable costs that we incur for providing you with access to any of your personal information that we hold. If you make a request we may require specific information from you to help us confirm your identity. This is to ensure that personal information is not disclosed to anyone who does not have the right to receive it.

**9.4** You may exercise your rights in 9.1 above, as well as contact us with any questions, concerns or complaints about the way in which we have handled your personal information, or if you believe that we have not complied with our obligations under the Privacy Law, by contacting us directly using the details set out in 2 above.

## **10. CHANGES TO THIS PRIVACY POLICY**

**10.1** We may make changes to this Privacy Policy from time to time. We will post any changes to our site, or notify you of any material changes by e-mail.

This Privacy Policy was updated on 29 August 2019.