



## Privacy Policy

We are bound by the Privacy Act 1988 (Cth) (**Privacy Act**) and the Australian Privacy Principles (APPs). This policy explains how and why we collect, use, hold and disclose your personal information.

**"We", "us" and "our"** means Birdon Global Pty Ltd ABN 93 646 170 836 of 4 Glen Ewan Road, Port Macquarie NSW Australia 2444.

### What is Personal Information?

Personal information is any information or an opinion about an identified individual or an individual who can be reasonably identified from the information or opinion. Information or an opinion may be personal information regardless of whether it is true.

Sensitive information is a subset of personal information that is given a higher level of protection under the Privacy Act. We may collect 'sensitive information' in limited circumstances.

### What Personal Information Do We Collect and Hold?

We collect information about you and your interactions with us, for example, when you purchase or use any of our products or services, call us, or otherwise visit our website.

We only collect personal information that is reasonably necessary for our business or marketing purposes. The types of personal information we may collect include:

- (a) Your Identity
- (b) Contact details including street address, mailing address, email, and phone number,
- (c) Date of birth or age,
- (d) Banking and financial details,
- (e) Credit card details,
- (f) Tax file number and stapled superannuation,
- (g) Driver's License number, Passport number and visa details,
- (h) Photographs, audio, or video recording e.g., CCTV,
- (i) Employment records,
- (j) Educational qualifications,
- (k) Details of products and services we have provided to you,
- (l) Enquiries you have made and our responses to you,
- (m) Information provided through customer surveys or complaints,
- (n) Any other personal information requested by us and provided by you or a third party.

We may collect information about how you access, use and interact with the website. We do this by using a range of tools such as Google Analytics and HubSpot. This information may include:

- (a) The location from which you have come to the site and the pages you have visited; and



- (b) Technical data, which may include IP address, the types of devices you are using to access the website, device attributes, browser type, language and operating system.

### Use of Cookies:

We use cookies on the website. A cookie is a small text file that the website may place on your device to store information.

We may use persistent cookies (which remain on your computer even after you close your browser) to store information that may speed up your use of our website for any of your future visits to the website. We may also use session cookies (which no longer remain after you end your browsing session) to help manage the display and presentation of information on the website.

You may refuse to use cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to use the full functionality of the website.

### Why Do We Collect, Hold and Use Your Personal Information?

We collect, hold and use your personal information so that we can:

- (a) Provide you with products and services, and manage our relationship with you;
- (b) Contact you, for example, to respond to your queries or complaints, or if we need to tell you something important;
- (c) Comply with our legal obligations and assist government and law enforcement agencies or regulators;
- (d) Consider your employment application; or
- (e) For analytics, market research and business development.

### Legal Basis for Using Your Personal Information

We will only collect, use and share your personal information where we are satisfied that we have an appropriate legal basis to do this. This may include:

- (a) We have obtained your prior consent;
- (b) We need to use your personal information in connection with the performance of a contract with you or to take steps at your request prior to entering into a contract with us;
- (c) We need to use your personal information to comply with a relevant legal or regulatory obligation that we have; or
- (d) Where it is necessary for our legitimate interests (or those of a third party) as a commercial organisation.

### How Do We Collect Your Personal Information?

We will collect your personal information directly from you whenever you interact with us.

We may collect information from third parties such as Facebook, LinkedIn, YouTube, recruitment agents, and training bodies.

If you do not provide us with your personal information, we may not be able to provide you with our services, communicate with you or respond to your enquiries.



## How Do We Store and Hold Personal Information?

We store most information about you in computer systems and databases operated by either us or our external service providers. Some information about you is recorded in paper files that we store securely.

We implement and maintain processes and security measures to protect personal information, which we hold from misuse, interference or loss, and from unauthorised access, modification or disclosure.

These processes and systems include the following:

- (a) Requiring all employees to comply with internal information security policies and keep information secure.
- (b) Monitoring and regularly reviewing our practise against our own policies and against industry best practice.
- (c) Secure backups.

We will also take reasonable steps to securely destroy or de-identify personal information once we no longer require it for the purposes for which it was collected or for any secondary purpose permitted under the APPs.

## Who Do We Disclose Your Personal Information to and why?

We may transfer or disclose your personal information to our related companies.

We may disclose personal information to external service providers so that they may perform services for us or on our behalf. Where we disclose your personal information to third parties, we will request they handle your information in accordance with this policy

We may also disclose your personal information to others where:

- (a) We are required or authorised by law to do so;
- (b) You may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
- (c) We are otherwise permitted to disclose the information under the Privacy Act.

If the ownership or control of all or part of our business changes, we may transfer your personal information to the new owner.

## Do We Disclose Personal Information to Overseas Recipients?

We operate on a global basis. Accordingly, we may disclose your personal information to recipients that are located outside Australia.

We may disclose your personal information between our related international entities or business partners overseas where necessary to fulfil our business purposes. Our related entities based overseas include Birdon America Inc. and Birdon (UK) Ltd. These recipients are in Denver, USA, and the United Kingdom.

When Birdon discloses your personal information to other overseas recipients, we will take all reasonable steps to ensure they protect your personal information in accordance with the Privacy Act and the requirements of applicable law wherever the data is located.

## Do We Use Your Personal Information for Marketing?

We will request your consent prior to sending you marketing communications. We will use your personal information to offer you products and services we believe may interest you, but we will not do so if you tell us



not to. These products and services may be offered by us, our related companies, our other business partners or our service providers.

Where you receive electronic marketing communications from us, you may opt out of receiving further marketing communications by following the opt-out instructions provided in the communication at any time.

## Access to and Correction of Your Personal Information

You may access or request correction of the personal information that we hold about you by contacting us. Our contact details are set out below. There are some circumstances in which we are not required to give you access to your personal information.

There is no charge for requesting access to your personal information, but we may require you to meet our reasonable costs in providing you with access (such as photocopying costs or costs for time spent on collating large amounts of material).

We will respond to your requests to access or correct personal information in a reasonable time and will take all reasonable steps to ensure that the personal information we hold about you remains accurate, up to date, complete, relevant and not misleading.

## Your rights under the European Union General Data Protection Regulation

Under the European Union General Data Protection Regulation, as a data subject you have the right to:

- (a) Access your data;
- (b) Have your data deleted (where legally permissible)
- (c) Correct your data where it is inaccurate;
- (d) Object to your data being processed and to restrict processing;
- (e) Withdraw consent to having your data processed;
- (f) Have your data provided in a standard format so that it can be transferred elsewhere;
- (g) Object to marketing; and
- (h) Not be subject to a decision based solely on automated processing.

(Together, the **Data Subject Rights**.)

We have processes in place to deal with Data Subject Rights requests. Our actions and responsibilities will depend on whether we are the controller or processor of the personal data at issue. Depending on our role as either a controller or processor, the process for enabling Data Subject Rights may differ, and are always subject to applicable law. Please refer to the contact details section of this policy if you would like to make a Data Subject Rights request.

## Reporting Notifiable Data Breaches

Birdon understands our responsibilities under the Privacy Act to report any notifiable data breaches to any affected individuals, corporations, and the Office of the Australian Information Commissioner. Birdon has in place a data breach response plan intended to enable us to contain, assess and respond to data breaches in a timely manner, and to help mitigate potential harm to individuals.

## Complaints

If you have a complaint about the way in which we have handled any privacy issue, including your request for access or correction of your personal information, you should contact us. Our contact details are set out below.



We will consider your complaint and determine whether it requires further investigation. We will notify you of the outcome of this investigation and any subsequent internal investigation.

If you remain unsatisfied with the way in which we have handled a privacy issue, you may approach an independent adviser or contact the Office of the Australian Information Commissioner (OAIC) ([www.oaic.gov.au](http://www.oaic.gov.au)) for guidance on alternative courses of action that may be available. If you are not based in Australia, you may contact your local supervisory authority at any time and lodge a complaint (the Information Commissioners Office in the United Kingdom).

## Contact Details

If you have any questions, comments, or concerns, please contact us at:

Email: [info@birdon.com.au](mailto:info@birdon.com.au)

(02) 6589 9100

## Changes to This Policy

From time to time, we may change our policy on how we handle personal information or the types of personal information that we hold. Any changes to our policy will be published on our website.

You may obtain a copy of our current policy from our website or by contacting us at the contact details above.

Approved by

**James Cole**  
Chief Operating Officer

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