

EB & Co Consulting Pty Ltd Privacy Policy

This Privacy Policy (Policy) outlines how EB & Co Consulting Pty Ltd (ABN 26 657 066 245) ("EB & Co", "us", "our", "we") collects and handles your personal information and protects your privacy rights. This Policy also sets out how we meet privacy obligations when handling your personal information.

EB & Co provides a range of services including analysis, assessment and advice to organisations to support their transformation or strengthening of workplace culture, particularly in the areas of equality, inclusion and diversity. To provide these services, EB & Co collects personal information.

This Policy lets you know what personal information we collect, what we do with it, when we may disclose it and how you can access or correct the personal information we hold about you.

PRIVACY

In this Policy, **personal information** means any information or opinion, whether true or not, and whether recorded in material form or not, about an identified individual, or an individual who is reasonably identifiable. Personal information does not include information that is properly de-identified.

Sensitive information is a subset of personal information. Sensitive information includes information or an opinion about an individual's race, gender identity, sexual orientation, disability, ethnic origin, political opinions, religious or philosophical beliefs, and criminal record. Sensitive information also includes health information. Sensitive information is generally awarded a higher level of privacy protection than other types of personal information.

Health information means any information or opinion about, or in relation to an individual's health or disability or health services provided to an individual and includes an individual's expressed wishes regarding the future provision of health services. Health information also includes an individual's genetic information that is, or could be, predictive of the future health of the individual or their genetic relative.

UPDATES TO THIS POLICY

Please note we may change or update this Policy from time to time by publishing changes on our website (<https://elizabethbroderick.com.au/>). We recommend you review this Policy on our website from time to time.

COLLECTING PERSONAL INFORMATION

Generally, we collect your personal information directly from you, for example:

- when we deal with you either face to face or virtually, such as for the purposes of a one-on-one discussion or a group listening session;
- over the phone;
- when you interact with our website;
- in writing, such as when you send us correspondence (including via email); or
- when you complete a questionnaire, form, or survey.

We may, from time to time, collect your personal information from other sources such as:

- your authorised representatives, such as your employer;
- other individuals who participate in our discussions or workplace group listening sessions;
- through online platforms we use to provide our services, such as SurveyMonkey, Calendly, Microsoft Forms or Microsoft Bookings; and
- our service providers, such as the Social Research Centre.

We do not collect personal information from or about children (individuals under the age of 18).

PERSONAL INFORMATION WE MAY COLLECT

We collect different types of personal information. You can decline to provide this information if you prefer not to say, but should you agree, depending on the nature of our engagement with you, we may collect your:

- name and gender identity;
- business details including business address, job title, occupation, how long you have been employed, and name of your employer, or entity for whom you provide services;
- personal experiences in the workplace, including of racism, sexism or other forms of discrimination;
- personal experiences in the workplace, including in relation to sexual misconduct or bullying;
- your views about the culture of your organisation with which you work, including your perceptions of psychosocial safety;
- your perceptions and experiences of the reporting processes for inappropriate behaviours within an organisation with which you work;
- ethnicity, country of birth, language spoken at home;
- sexual orientation;
- religious background;
- whether you have a disability;
- whether you have caring responsibilities;

- personal contact details such your email address, phone, and mobile phone number; and
- information about your health and wellbeing that you share with us. If you are applying for a paid or volunteer position with us, we may also collect personal information about you from third parties including:
 - recruiters;
 - previous employers;
 - Police, to obtain your criminal history;
 - academic institutions;
 - superannuation fund provider/s; or
 - your referees.

It is important to be aware that if you access another party's website or application using one of our products or services or via our website, that other party will deal with your personal information in accordance with its own Privacy Policy. You will need to review those websites to view a copy of the relevant Privacy Policy.

PURPOSE FOR COLLECTING, USING AND DISCLOSING YOUR PERSONAL INFORMATION

We collect your personal information for the following purposes:

- to provide our services to you, or to engage with you;
- to provide services to our client per the terms of any engagement letter, service agreement, supply of services contract, or employment agreement;
- for purposes relating to the engagement of our personnel (including consultants) including:
 - to carry out recruitment purposes such as pre-employment screening, contacting referees, processing applications, administering psychometric testing, assessment for suitability for future positions, background checks and ongoing analytic purposes such as ensuring we are reaching a diverse range of candidates; and
 - matters relating to EB & Co;
- for development and analytics purposes, including to develop our expertise and know how, including:
 - for benchmarking purposes,
 - development, analytics and business intelligence functions including website trend and performance analysis,
 - quality assurance and thought leadership, and
 - other purposes related to our business.

We may also use non-personal, de-identified and aggregated information for purposes including data analytics, research, submissions, and thought leadership. Any output is anonymised or aggregated so that no personal information or information relating specifically to you is reasonably identifiable or can be re-identified.

We seek to limit the amount of information we collect at all times and will only use your personal information for lawful and reasonable purposes, and in accordance with law.

STAYING ANONYMOUS OR USING A PSEUDONYM

Where it is possible and lawful, you may interact with us anonymously or by using a pseudonym. However, we note that in many instances, we will need your name in order to perform our services. If you choose not to provide us with your personal information, we may not be able to provide you with our services.

HOLDING PERSONAL INFORMATION

We value the security of your personal information.

We hold personal information in both hard copy and electronic formats. We will endeavour to take all reasonable steps to secure any information we hold about you, whether electronically or in hard copy, and to keep this information accurate and current.

We store hard copy information in locked offices.

We store electronic information on a cloud-based Microsoft Azure platform and engage a range of technological controls (for example, access restrictions, firewalls, encryption, passwords, and digital certificates) to keep electronically stored information secure.

We only keep your personal information for as long as it is required for the purposes for which it was collected, or otherwise in accordance with the timeframes under applicable laws. If we no longer need to hold your personal information, we will take reasonable steps to destroy that information or de-identify it. These steps may vary depending on the nature of the personal information, how it was collected, and whether the information is in hard copy or electronic format.

We also require our employees, contractors, and others (such as third parties engaged by EB & Co to deliver our services) to respect the confidentiality of any personal information held by EB & Co in accordance with law.

In some cases, we engage third parties to host electronic data (including data related to the services we provide) on our behalf. In some cases, such data may be stored by the third party overseas.

If you have participated in our social research, we will only re-contact you if you consented to participate in research, or if we have valid reasons to believe a genuine research concern warrants re-contact.

DISCLOSING PERSONAL INFORMATION

In the course of delivering our products and services, or processing applications for work or volunteer opportunities at EB & Co, we may disclose your personal information to the following:

- our agents, consultants, third party contractors and suppliers who provide us administrative support (such as IT services), or who assist us with the delivery of our business processes and products and services;
- other parties when you ask us to do so or when you consent to that disclosure;
- government agencies, legal and regulatory bodies as required by law;
- our professional advisers including lawyers, accountants, IT consultants and auditors;
- referees or former employers; and
- third party data management service providers including Microsoft, which may be located outside of Australia.

Where you are a customer, an employee, a contractor or a supplier of services to one of our clients, then we may disclose your personal information **to our client if we deem you are at serious risk of imminent harm.**

We will not otherwise disclose your personal information to a third party unless:

- we have your consent;
- we are required to do so under compulsion of law; or
- an applicable exemption applies under relevant privacy law.

ACCESS TO AND CORRECTION OF YOUR PERSONAL INFORMATION

We will use our best efforts to ensure the personal information we collect from you is accurate, complete, and up to date. Where we have collected your information from a third party, we will take reasonable steps to notify you of this and to ensure the information collected is current and correct.

You may request access to, or the correction of, the personal information we hold about you at any time. You may do this by contacting the EB & Co Privacy Officer as set out below.

Please note we will need to verify your identity before we can respond to your request.

Generally, we will aim to provide you with access to your personal information in line with your request within 28 days or another reasonable period. If we decide to refuse your request, we will provide you with written reasons why, and information about how you may lodge a complaint.

DATA BREACH INCIDENTS

If we discover that there has been actual or suspected unauthorised access to, disclosure or use of, your personal information (a data breach), we may contact you to inform you. We will work with you to mitigate the consequences, including harms, resulting from any such data breach.

We may also in certain circumstances notify a relevant privacy regulator about certain data breaches.

COMPLAINTS

You may make a complaint about how EB & Co handles your personal information at any time in writing to the EB & Co Privacy Officer using the details set out below. We will endeavour to respond to your complaint within a reasonable period of time to confirm receipt and to inform you of the relevant next steps we may take in response.

If you are not satisfied with our response, you may lodge a complaint with the Office of the Australian Information Commissioner via their website at www.oaic.gov.au.

CONTACT US

If you have a question or comment regarding this Policy, or wish to make a complaint, please contact:

Lynette Garrick, Privacy Officer

EB & Co Consulting Pty Ltd

Email: admin@elizabethbroderick.com.au

REVIEW AND DOCUMENT CONTROLS

Policy name:	Privacy Policy
Review frequency:	Every 12 months or when privacy obligations and information handling practices change.
Responsible person	EB & Co Privacy Officer
Approval	Elizabeth Broderick, Principal

Review	Date approved	Approved by
1.	July 2024	EB & Co Privacy Officer