

Privacy Policy

Introduction

Geografia respects and upholds the rights of individuals under the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) ('Privacy Act'). This Privacy Policy outlines what Personal Information we hold, what we do with it, who we will disclose it to, and how individuals can access the Personal Information we may hold about them.

A copy of the Australian Privacy Principles can be obtained from the website of The Office of the Federal Privacy Commissioner at www.privacy.gov.au.

What is Personal Information?

Personal Information in this policy has the same meaning as under the Privacy Act and includes any information (true or not) about an individual who is, or could reasonably be, identified with that individual. Examples of Personal Information include:

- Name
- Age
- Date of birth
- Phone number
- Email address
- Credit card details
- Salary information.

Sensitive Personal Information includes any information about an individual's:

- Racial or ethnic origin
- Political opinions
- Membership of a political association
- Religious beliefs or affiliations
- Philosophical beliefs
- Membership of a professional or trade association
- Membership of a trade union
- Sexual preferences or practices
- Gender identification

- Criminal records
- Health information.

What Personal Information do we hold?

The Personal Information we collect may include employee, supplier, client, data product subscriber, and customer contact details and, in the case of employees, the Personal Information sufficient for us to discharge our responsibilities as an employer. Financial and credit card information may also be collected from clients, data product subscribers, and customers but this will generally be corporate rather than individual Personal Information.

The data we use in our data products and consultancy assignments is generally procured from third parties which have already de-identified and/or anonymised the data. Such data should not include any Personal Information and we will not use or manipulate the data in such a way that could lead to a re-identification of individuals, or their Personal Information.

How do we collect Personal Information?

Where possible, Geografia will collect Personal Information directly from an individual. We may also collect Personal Information as part of stakeholder and community engagement activities (including in-person interviews; by telephone, by email, from third parties such as survey firms, and via online surveys); from publicly available sources; and through our company website.

When we collect Personal Information, where appropriate and where possible, we explain to the individual why we are collecting their information and how we plan to use it. As far as is practical, we communicate this verbally and in writing.

Where reasonable and practicable to do so, we will collect Personal Information only directly from the individual to whom it relates. However, in some circumstances we may be provided with information by third parties. In such a case, we will take reasonable steps to ensure that the individual is made aware of the information provided to us by the third party.

How do our websites collect Personal Information?

The site servers for websites managed by Geografia make a record of each user visit and logs the following information for statistical and administrative purposes:

- the user's server address so we can tailor the sites to the interests and requirements of regular users;
- the date, time, and duration of the visit to identify patterns of usage and manage our maintenance activities;

- pages accessed and documents downloaded to understand which content is of most interest to users;
- type of browser so we can use browser specific coding; and
- visiting domain name or IP address, computer operating system, browser type and screen resolution to we can optimise the usefulness of the site and tailor future development.

A cookie is a piece of information that an internet website sends to a browser when information on that site is accessed. Cookies are either stored in memory (session cookies) or placed on the user's hard disk (persistent cookies). Geografia does not use persistent cookies. Once a browser is closed, the session cookies are destroyed, and no Personal Information is retained which may identify the user on subsequent visits.

What do we do with Personal Information?

We collect Personal Information for the primary purpose of carrying out our work for clients and data product subscribers. We may sometimes use Personal Information for secondary purposes closely related to the primary purpose, in circumstances where the individual would reasonably expect such use or disclosure.

In some cases, we may pass on Personal Information we have collected to our clients for their use (e.g. to compile stakeholder lists). In all cases, this will be made clear to the owner of the Personal Information, as will the fact that Geografia will take no responsibility for the actions of subsequent users. In these instances, we do not keep copies of the Personal Information we have collected.

With respect to Sensitive Information, we will only ever use this:

- for the primary purpose for which it was obtained;
- for a secondary purpose that is directly related to the primary purpose; and
- with the consent of the person; or where required or authorised by law.

It is important to us that Personal Information is up to date. We take reasonable steps to make sure that Personal Information is accurate, complete and up-to-date, at least for the duration of the period in which the Personal Information is being held and used by Geografia.

Where we have obtained an individual's consent to do so, or in circumstances where it would be reasonably expected, Geografia may use Personal Information to contact individuals with marketing and similar information about our services.

To whom will we disclose Personal Information?

We may disclose Personal Information to our professional advisers (e.g. accountants and legal advisers) and our IT service providers during the course of their work for us, and, as described above, we may provide contact details to our clients. We will also disclose

Personal Information to other third parties where the individual consents to the use of disclosure, or where required or authorised by law to do so.

If Personal Information is disclosed to any overseas recipient (such as a cloud-based hosting service) we will endeavour to take adequate measures to ensure that the personal information is handled by the overseas recipient in accordance with the Privacy Act and our instructions, for the purposes described above.

By providing their Personal Information to Geografia, individuals consent to these disclosures of Personal Information related to our provision of services or our mutual contractual relationships.

How can individuals access their Personal Information?

An individual may access the Personal Information we hold about them, update and/or correct it, subject to certain exceptions. If a person wishes to access their Personal Information, we ask that they contact us in writing. We may require evidence of identification before releasing the requested information.

Geografia will not charge any fee for access requests but may charge an administrative fee to cover any direct costs of retrieval.

If an individual believes that the Personal Information we hold is incorrect, incomplete, or inaccurate, they may request amendment and we will either make the amendment or make a record of the comment made, as appropriate.

How do we secure Personal Information?

We will take reasonable steps to protect Personal Information and protect such information for loss, misuse, and unauthorised access, use, modification, disclosure, alteration, or destruction.

However, it should be kept in mind that the transmission of the information over the internet is not completely secure and, in particular, communications sent by email may not be secure.

How long do we hold Personal Information?

When Personal Information is no longer needed for the purpose for which it was obtained, we take reasonable steps to destroy or permanently de-identify it unless we are legally or contractually required to retain the information for a longer period. If we are required to hold information for the longer term, it will continue to be managed in accordance with this policy.

Questions and complaints

For any questions about this Privacy Policy or to make a complaint about how we have failed to keep our commitments under this policy or our obligations in law please contact our Privacy Officer at info@geografia.com.au or, by mail, to Level 21, 15 Collins Street, Melbourne, VIC, 3000.

We will respond and advise whether we agree with the complaint. If we do not agree, we will provide reasons. If we do agree we will advise the action we are going to take to rectify the complaint. If this does not provide satisfaction a further complaint may be made to the Office of the Australian Information Commissioner (enquiries@oaic.gov.au).

Policy status

This Policy is effective from 10 May 2024.

We may change this policy from time to time. Although we intend to observe the policy at all times, it is not legally binding on Geografia in any way. From time to time, we may regard it as necessary or desirable to act outside the policy. Geografia may do so, subject only to any other applicable contractual rights individuals may have, and any statutory rights they have under the Privacy Act or other applicable legislation.