

**Diversified Communications Australia**

# **Privacy Policy**

## 1 About this policy

This section explains how to read this policy and describes its purpose.

### 1.1 Interpretation of this document and general overview

Defining specific terms:

- “Privacy information” includes personal information and sensitive information.
- “Personal information” includes information that is capable of identifying an individual such as name, address and date of birth.
- “Sensitive information” includes information relating to health or religion, racial or ethnic origin.
- “We”, “us” and “our” refer to Diversified Communications Australia.
- “APPs” refer to the Australian Privacy Principles in the *Privacy Act 1988* (Cth).

Diversified Communications Australia is subject to the Australian Privacy Principles as laid out in the *Privacy Act*.

### 1.2 Purpose of this policy

This Privacy Policy explains how our organisation protects your personal information. Along with our Collection Statement and notification procedures, our Privacy Policy lays down the principles by which we collect, store, use and disclose any personal information you provide to us or we collect from other sources.

Our Privacy Policy also informs customers and stakeholders how they can access their privacy information, correct privacy information held by us, and lodge complaints.

## 2 Type of information we collect and hold

The kinds of personal information we collect includes:

- Name;
- Address;
- Contact telephone number and email; and
- Occupation.

We do not intend to collect sensitive information, such as your political opinions or ethnic origin.

### 3 How we collect your information

Like any business, knowing our clients and understanding the nature of our business is central to what we do. We collect information directly from you by the following means:

- Online form or survey
- Hard copy form or survey
- On-ground oral survey
- Phone oral survey

While our general policy is to collect information from you directly and not from third parties, there are circumstances where it is unreasonable or impracticable to collect privacy information from you directly. For example, often collecting information from a broad range of potential clients and stakeholders is not feasible or possible without obtaining information from third parties, such as member associations. In these circumstances we collect information about attendees and exhibitors indirectly from third parties, where that third party is lawfully permitted to disclose that information.

We are under a presumption that if you are an attendee of an exhibition or a client of Diversified Communications Australia you expect to receive marketing communications from us or an exhibitor about an event.

This Policy acts as notice to all attendees and exhibitors that we intend to collect personal information indirectly from third parties in order to improve our exhibition business for the benefit of all taking part. If you disagree or have a query with regard to us collecting your information from third parties, you may contact our Privacy Officer and request that Diversified Communications Australia:

- cease disclosing information to exhibitors for the purpose of facilitating marketing;
- disclose the source by which we received your information.

If we receive either request we will, within a reasonable time, either cease disclosing your personal information to exhibitors or notify you of our third party source, unless an exception applies.

If you use any of our websites, we may also collect information that is Personal Information, and information such as that identified in our Terms and Conditions by our use of cookies. Some of that information may be personal information and to the extent that it is, this Privacy Policy applies to that information.

### 4 Purposes for which we collect and deal with your information

Diversified Communications Australia runs a national exhibition business in Australia and our main purpose is to facilitate exposure of organisations and business to new customers and clients - enabling marketing is central to our business model. We provide the skills and opportunity to enable successful exhibitions by organisations and businesses; and we collect

personal information to facilitate the communication between exhibitors and attendees and enable communication between Diversified Communications Australia and its customers.

As a general principle, we only use privacy information for the primary purpose for which we collect the information or a secondary purpose related to the primary purpose for which you would reasonably expect us to use the collected information.

The list of potential primary purposes for which we collect and deal with your privacy information is as follows:

- To enable us to communicate with attendees in organising and arranging exhibitions;
- To identify and invite potential exhibitors to an event;
- To identify and invite potential attendees to exhibitions;
- To allow Diversified Communications Australia to send past or prospective attendees promotional offers and information about special events;
- To share information about past and prospective attendees with exhibitors for marketing purposes;
- To allow Diversified Communications Australia to conduct its business operations: administrative, marketing, planning, product development and research activities;
- To use remarketing or similar audience features, and any other purpose identified in our Terms and Conditions.

## 5 **Direct Marketing**

In all direct marketing communication you receive from us we will include a simple opt-out procedure by which you may easily request to not receive direct marketing communications.

In the circumstance we collect information from third parties and intend to use that information for direct marketing, any direct marketing communication is subject to your prior consent. To this end, we collect information from third parties on the understanding that individuals have given their consent to the third party for us to use the information for direct marketing. You are also entitled to opt-out of any direct marketing you receive from us.

You are entitled to request a third party to not share your information with third parties.

## 6 **Cross border transfer or disclosure of information**

In the event we transfer information to an entity overseas, such as routing or storing information on cloud servers located overseas or transferring information to an office of our company overseas, we will ensure that adequate security mechanisms are in place to protect your information. For example, we will enter into a contract with the cloud server that ensures the information is for the limited purpose of storing and managing the personal information.

Diversified Communications Australia does not currently make overseas disclosures. However, it is possible that our business will develop marketing or research activities overseas that require us to make cross border disclosures.

In the event we make cross border disclosures, we will, unless an exception applies, put in place mechanisms to ensure your personal information is under a standard of protection that complies with the Australian Privacy Principles. Mechanisms may include:

- Verifying that the recipient to which the information is transferred overseas is subject to binding and enforceable laws that protect the information to a substantially similar standard as that imposed by the Australian Privacy Principles; or
- Diversified Communications Australia entering into a contract or memorandum of understanding that requires overseas recipients and any subcontractors to comply with the APPs in relation to the disclosed information.

## 7 **The consequences of not providing us with personal information**

If you choose to not provide us with personal information our ability to perform some essential business functions, such as facilitate communication between attendees and exhibitors – the primary purpose of an exhibition – might be compromised.

Depending on whether you are an attendee or an exhibitor, not providing us with personal information could mean we are unable to fulfil one of the above purposes for which we collect personal information.

## 8 **Maintaining the integrity, currency and safety of your privacy information**

This section explains how Diversified Communications Australia holds your personal information, how you can access your privacy information, update your privacy information, complain about breach of the APPs, or make any related enquiry.

### 8.1 **Maintaining currency of your information**

Diversified Communications Australia relies on accurate and reliable information to deliver successful exhibitions. If we are satisfied, that any of the information we have about you is inaccurate, out-of-date, irrelevant, incomplete or misleading, or you request we correct any information, we will take steps as are reasonable in the circumstance to ensure the information held by us is accurate, up-to-date, complete, relevant and not misleading.

### 8.2 **Safety of your information**

All privacy information is securely stored using appropriate electronic security technology, settings and applications, and by ensuring staff dealing with privacy information is trained in our privacy policies and procedures, such as our Privacy Policy and Data Stewardship System.

These policies and procedures are designed to protect privacy information from unauthorised access, modification or disclosure; and from misuse, interference and loss.

### 8.3 Accessing and correcting information

You are entitled at any time, upon request, to access your privacy information held by us. We will respond within a reasonable time after the request is made and give access to the information in the manner requested by you, unless it is impracticable to do so. We are entitled to charge you a reasonable administrative fee for giving you access to the information requested.

Should you be refused access to your information, we will explain the reasons for refusal - any exceptions under the *Privacy Act* or other legal basis relied upon as the basis for such refusal - and the complaint procedure if you wish to lodge a formal complaint about our refusal.

### 8.4 Correcting your information

If at any time we discover that information held by us is inaccurate, not up-to-date, incomplete, irrelevant or misleading, or you request us to correct information held by us, we will take reasonable steps to correct that information.

If we disclose your privacy information that is later corrected, we will, or else you may ask us to, notify the entity that received the incorrect information about that correction.

Should we refuse to correct the information, we will explain the reasons for the refusal. We will also show you the complaint procedure if you wish to lodge a formal complaint about our refusal.

### 8.5 Lodging a complaint

Should you wish to complain about a potential breach of this Privacy Policy or the Australian Privacy Principles please contact our Privacy Officer.

The Privacy Officer will make good faith efforts to rectify the issue and respond within a reasonable period after the complaint is made.

### 8.6 Contact details

Diversified Communications Australia  
Level 5, 636 St Kilda Road  
Melbourne VIC 3004  
Privacy Officer  
Ph: 03 9261 4500  
Email: [info@divcom.net.au](mailto:info@divcom.net.au)