

Diversified Communications Australia Pty Ltd

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:

- “APPs”, or “Australian Privacy Principles”, refer to the Australian Privacy Principles in the Privacy Act;
- “DCA”, “we”, “us” and “our” refer to Diversified Communications Australia Pty Ltd;
- “Personal information” has the meaning set out in the Privacy Act, and (in summary) means information or an opinion about an identified individual or an individual who is reasonably identifiable, whether true or otherwise.
- “Policy” means this Privacy Policy;
- “Privacy Act” means the *Privacy Act 1988* (Cth);
- “Privacy information” includes personal information and sensitive information; and
- “Sensitive information” has the meaning set out in the Privacy Act, and includes certain specific types of personal information such as health information, and information about a person’s racial or ethnic origin, sexual orientation or practices, criminal record, religious beliefs or affiliations, political opinions, membership of a political, professional or trade association, and biometric and genetic information.

1.2 Purpose of this Policy

DCA is subject to the Australian Privacy Principles in the Privacy Act. This Policy explains how we protect your personal information. Along with information about how we collect personal information, and notification procedures, this Policy sets out the principles by which we collect, store, use and disclose any personal information you provide to us or we collect from other sources.

This Policy also informs persons from whom we may have collected privacy information 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 include your:

- name;
- address;
- gender;
- contact telephone number and email;
- photograph; and
- occupation / position / role.

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 privacy information directly from you by the following means:

- when you register to attend, or attend at, any of our exhibitions or events; and
- by your participation in surveys, including those conducted online, in writing, orally or via the telephone.

While our general policy is to collect privacy 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 privacy information about attendees and exhibitors indirectly from third parties, where that third party is lawfully permitted to disclose that information.

If you are an attendee at an exhibition, or you are a client of DCA you will receive marketing communications from us, exhibitors about exhibitions or events, unless you advise us to the contrary.

We will collect personal information about attendees and exhibitors 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 our collection of your information from third parties, you may contact our Privacy Officer and request that DCA:

- cease disclosing information to exhibitors for the purpose of facilitating marketing; and / or
- 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 privacy information that is personal information, and information such as that identified in terms and conditions for exhibitions or events by our use of cookies. Some of that information may be personal information and to the extent that it is, this Policy applies to that information.

4 Purposes for which we collect and deal with your information

DCA 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 to
- enable communication between DCA 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 may deal with your privacy information is as follows:

- to enable us to communicate with attendees in organising and arranging exhibitions;
- to enable us to produce lists of the names of attendees that may be seen by other attendees at exhibitions or events;
- to identify and invite potential exhibitors to an event;
- to identify and invite potential attendees to exhibitions;
- to allow DCA 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 DCA to conduct its business operations: administrative, marketing, planning, product development and research activities; and

- to use remarketing or similar audience features, and any other purpose identified in identified in terms and conditions for exhibitions or events.

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 privacy 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 privacy 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**

If we transfer information to an entity overseas, such as routing or storing information on cloud servers located overseas or transferring information to an overseas entity of ours, 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.

DCA does not currently make overseas disclosures, nor does it have any overseas entities. However, it is possible that our business will develop marketing or research activities overseas that require us to make cross border disclosures.

If 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; and / or
- DCA 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, or opt-out of direct marketing communications, 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 **Sensitive Information**

We only collect sensitive information about you with your consent, or otherwise in accordance with the Privacy Act. The main types of sensitive information we may potentially collect include, if you visit a venue for one of our exhibitions or events, details of disabilities or allergies (i.e. health information) so we can accommodate any special requirements when you attend that venue.

If you do provide sensitive information to us for any reason (for example, if you provide us with information about an injury or a disability you have), you consent to us collecting that information and to us using and disclosing that information for the purpose for which you disclosed it to us and as permitted by privacy law and other relevant laws.

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

This section explains how DCA 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.

9.1 *Maintaining currency of your information*

DCA 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.

9.2 *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 unauthorized access, modification or disclosure; and from misuse, interference and loss.

9.3 *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.

If you are 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.

9.4 *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.

9.5 *Lodging a complaint*

If you wish to complain about a potential breach of this Policy or the Australian Privacy Principles, please contact our Privacy Officer as noted below in paragraph 9.6.

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

If You are dissatisfied with the handling of your complaint, you may contact the Office of the Australian Information Commissioner:

Office of the Australian Information
Commissioner
GPO Box 5218, Sydney NSW 2001

Telephone: 1300 363 992
Email: enquiries@oaic.gov.au

9.6 *Our contact details*

Privacy Officer
Diversified Communications Australia Pty Ltd
Level 22, 181 William Street, Melbourne VIC
3000
Ph: 1300 DIVCOM
Email: info@divcom.net.au

10 Changes to this Policy

We review and amend this Policy from time to time. Any changes we make to this Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

Please check back frequently to see any updates or changes to this Policy. The new terms may be displayed on-screen and you may be required to read and accept them to register, or attend at, exhibitions or events.

Date: June 2023