

# Privacy Policy

## Introduction

Direction First (ABN: 21 078 348 320) ("DIRECTION FIRST") respects and upholds your rights under the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) ("Privacy Act"). DIRECTION FIRST also adheres to the *Privacy (Market and Social Research) Code 2014* ("Code"). For more information about the Privacy Act, the Australian Privacy Principles and the Code (<http://www.oaic.gov.au/privacy/privacy-act/australian-privacy-principles>).

This Privacy Policy for DIRECTION FIRST lets you know what personal information of yours we hold, what we do with it, who we will disclose it to and how you can access the personal information we hold about you. You can also find out here how to change inaccurate personal information and how to opt out of receiving communications from us.

## What personal information about you does DIRECTION FIRST collect and hold?

The information DIRECTION FIRST will collect may include your name, phone numbers, email address, location (state), occupation and place of employment, and your opinions and feedback in relation to our clients. When providing personal information you have the option of remaining anonymous or use a pseudonym to be identified by. However, in circumstances where we receive your contact details from a third party or where the research data itself may potentially allow for identification, this may will not be practicable.

On rare occasions, depending on the nature of the research we conduct, we may also collect sensitive information from you, including information on your 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, criminal record or health information. Sensitive information will only be collected with your prior consent and only if it is directly related to, or reasonably necessary for, the research we conduct.

In the case we have obtained your contact details from the client that commissioned the study, we assume that prior consent was given to the client and take no responsibility in the event of such consent not having been given. The client list will only be used for the intended study.

## How does DIRECTION FIRST collect and hold your personal information?

DIRECTION FIRST will generally collect your personal information directly from you in the course of you participating in our research and/or surveys. However, we may also from time to time collect personal information about you from our client at the time of obtaining your contact details. If so, we will inform you as soon as practicable of this collection and the circumstances of this collection.

We may also collect personal information from a third party supplier, such as commercial providers of residential sample.

## **What are the purposes for which DIRECTION FIRST uses, handles and discloses your personal information?**

We will only use and disclose your personal information for the purpose of conducting our research and in accordance with this Privacy Policy. We will not use or disclose your personally identifiable information for the purpose of advertising, promotions or direct marketing activities. If you declined to participate in our research, we may use your personal information to re-contact you for a research purpose if we have valid reasons to believe a genuine research concern warrants such re-contact. If you have participated in our research, we will only re-contact you if you were informed of this or we have valid reasons to believe a genuine research concern warrants such re-contact.

## **Who will DIRECTION FIRST disclose your personal information to?**

DIRECTION FIRST will not disclose any personally identifiable research information we collect from you unless we have your express prior consent and will only report the information you provide in an aggregate form that will not personally identify you. We will not disclose any personal information or personally identifiable research information to a third party for a purpose other than conducting our research unless we have your express prior consent or are required to do so by an Australian law or court/tribunal order.

DIRECTION FIRST does not rely on third party service providers who are located overseas to host or store the data we collect. Should this change DIRECTION FIRST will take reasonable steps to ensure any service providers (and their employees and contractors) comply with the Privacy Act and this Privacy Policy, and/or are subject to similar privacy laws and you have the ability to enforce those rights.

## **Openness**

You have the right to request access to any personal information we hold about you. You can request this information by contacting the Privacy Officer at the details listed below. Where we hold information that you are entitled to access, we will respond to your request in a reasonable time and endeavour to provide you with a suitable range of choices as to how access is provided (eg, emailing or mailing it to you). A fee may be charged to cover the cost of retrieval. However this fee will not be excessive and will only apply to the facilitation of your request.

If at any time you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request amendment of it and we will either amend the information or make a record of your comment, as we think appropriate.

## **Questions and Complaints**

If you have any questions about this Privacy Policy or believe that we have at any time failed to keep one of our commitments to you to handle your personal information in the manner required by the Privacy Act, the APPs or the Code, then we ask that you contact us immediately using the following contact details:

Privacy Officer  
Amalia Czeizler  
amalia.czeizler@directionfirst.com

Ph (02) 8354 4800

We will respond and advise whether we agree with your complaint or not. If we do not agree, we will provide reasons. If we do agree, we will advise what (if any) action we consider it appropriate to take in response. If you are still not satisfied after having contacted us and given us a reasonable time to respond, then we suggest that you contact the Office of the Australian Information Commissioner by:

Phone: 1300 363 992 (local call cost, but calls from mobile and pay phones may incur higher charges). If calling from overseas (including Norfolk Island): +61 2 9284 9749  
TTY: 1800 620 241 (this number is dedicated to the hearing impaired only, no voice calls)  
TIS: Translating and Interpreting Service: 131 450 (If you don't speak English or English is your second language and you need assistance and ask for the Office of the Australian Information Commissioner)

Post: GPO Box 2999 Canberra ACT 2601  
Fax: +61 2 9284 9666  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

### **DIRECTION FIRST Website**

When visiting DIRECTION FIRST's web site, the site server makes a record of the visit and logs the following information for statistical and administrative purposes:

- the user's server address – to consider the users who use the site regularly and tailor the site to their interests and requirements;
- the date and time of the visit to the site – this is important for identifying the website's busy times and ensuring maintenance on the site is conducted outside these periods;
- pages accessed and documents downloaded – this indicates to DIRECTION FIRST which pages or documents are most important to users and also helps identify important information that may be difficult to find;
- duration of the visit – this indicates to us how interesting and informative the DIRECTION FIRST site is to candidates; the type of browser used – this is important for browser specific coding
- In order to optimize the DIRECTION FIRST web site and better understand it's usage, we collect the visiting domain name or IP address, Computer Operating System, Browser Type and Screen Resolution.

A cookie is a piece of information that an Internet web site sends to your browser when you access information at that site. Cookies are either stored in memory (session cookies) or placed on your hard disk (persistent cookies). The DIRECTION FIRST web site does not use persistent cookies. Upon closing your browser the session cookie set by this web site is destroyed and no Personal Information is maintained which might identify you should you visit our web site at a later date.

### **Retention and destruction of Personal Information**

DIRECTION FIRST will destroy or de-identify your personal information as soon as practicable once it is longer needed for the purpose for our research purposes. However, we may in certain circumstances be required by law to retain your personal information after our research has been

completed. In this case your personal information will continue to be protected in accordance with this Policy. If we destroy personal information we will do so by taking reasonable steps and using up-to-date techniques and processes.

### **Security of Information**

DIRECTION FIRST will take reasonable steps to protect your personally identifiable information as you transmit your information from your computer to our website and to protect such information from loss, misuse, and unauthorised access, use, modification, disclosure, alteration, or destruction.

However, you should keep in mind that the transmission of information over the Internet is not completely secure or error-free. In particular, e-mail sent to or from this website may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail.

### **Miscellaneous**

In this policy "personal information" has the same meaning as under the Privacy Act.

This policy is effective from 12 March 2014. We may change this policy from time to time. Although we intend to observe this Privacy Policy at all times, it is not legally binding on DIRECTION FIRST in any way. From time to time we may regard it as necessary or desirable to act outside the policy. DIRECTION FIRST may do so, subject only to any other applicable contractual rights you have and any statutory rights you have under the Privacy Act or other applicable legislation.