

## Privacy Policy

### 1. Preamble

- 1.1. TCS intell as an organisation recognises the need for the correct handling of information gathered in the course of business.
- 1.2. TCS intell clients, prospective clients, business associates and staff all have a right to have confidence that the information TCS intell stores and processes is handled in a manner which upholds their best interests. To this end TCS intell is undertaking and will continue to undertake all reasonable measures to comply with the National Privacy Principles as outlined the Australian Privacy Commissioner.

### 2. Personal Information

- 2.1. For the purposes of TCS intell Privacy Policy the term Personal Information is defined as any information that describes an identifiable person. The person may be a staff member, a client, a prospective client or a business associate. A person is identifiable if the information provides the address, full name, phone number or similar information that could result in the person to whom the information pertains being contacted.
- 2.2. Our Obligation We are required to comply with the Australian Privacy Principles (APPs) in the Privacy Act. The APPs regulate the manner in which personal information is handled throughout its life cycle, from collection to use and disclosure, storage, accessibility and disposal. We are also required to comply with more specific privacy legislation in some circumstances, such as:
  - Applicable State and Territory health privacy legislation (including the Victorian Health Records Act ) when we collect and handle health information in the relevant jurisdiction; and
  - The Spam Act and the Do Not Call Register Act

### 3. Liability

Despite TCS intells commitment to policies that protect the rights of individuals to privacy TCS intell will not accept liability for loss or damage resulting from the disclosure of information provided to TCS intell.

### 4. Collection of Information

- 4.1. TCS intell will only collect the information required in the normal course of business. As TCS intell is the Removal Business this may involve the collection of relevant detail about an individual's personal belongings and travel arrangements.
- 4.2. At all times the collection of information will be visible and obvious to the individual to whom the information pertains. In other words, TCS intell will not collect information without the consent of the individual.
- 4.3. The Means of Collection of Personal Information include:
  - 4.3.1. Providing web pages into which an individual may enter their details to make an enquiry or request a service such as a quote.
  - 4.3.2. Providing then collecting printed forms for the client to complete with information necessary to provide a quotation or perform a removal.
  - 4.3.3. Staff asking questions and recording the details for subsequent use.
- 4.4. In all of the above cases, TCS intell will endeavour to ensure that the informant understands why the information is being requested and that the information will be handled in accordance with this agreement.
- 4.5. The Personal Information collected The type of personal information that we collect about you depends on the type of dealings you have with us. For example, if you:
  - 4.5.1. are a client of the company, we will collect your name, job title, address, contact details, information about our dealings with you, the legal areas that are of interest to you and information about the events and seminars that you have attended;
  - 4.5.2. are involved in a matter that we are working on, we may collect your name, contact details and information about the relevant matter;
  - 4.5.3. ask to be placed on one of our mailing lists, we will collect your name, address and contact details;
  - 4.5.4. supply goods or services to us, we will collect your name, address, contact details and financial details

- for payment purposes;
  - 4.5.5. send us an enquiry or provide us with feedback, we will collect your name, contact details and details of your enquiry or feedback;
  - 4.5.6. apply for a job with us, we will collect the information you include in your job application, including your cover letter, resume, contact details and referee reports;
  - 4.5.7. are involved in a dispute with our client, we will collect your name, address, contact details and relevant file numbers held by our client.
- 4.6. Note that TCS intell may use electronic means such as 'cookies' to make repeat visits to our web sites more effective for the web site users. However, any information will be recorded for statistical purposes only and will not be used to establish the identities of the web site visitors. Web site visitors will only be identifiable if they choose to voluntarily enter their details into a provided web data entry form.

## 5. Use and Disclosure of Information

### 5.1. Primary Purpose

- 5.1.1. TCS intell will only use the information provided by individual for the purpose required by its normal business operations. TCS intell will disclose the information to suppliers and business partners where either the supplier and/or business partner require the information in order to assist TCS intell in the provision of services for the customer.

### 5.2. Secondary Purposes

- 5.2.1. In the case of a Corporate Relocation (where an organisation arranges for the relocation of one of its staff) sufficient personal detail to identify a relocating employee may be made available to the HR staff of the corporate client via our Corporate Web Site. This is done for the benefit of the Corporate Client in order to oversee and manage the moves that they have in place with TCS intell at a particular time.
- 5.2.2. TCS intell may also use the information to create mailing lists (email, fax, postal or other) to make its customers aware of related services that may benefit from. Wherever such mailing lists are employed, TCS intell will ensure that the customer has the clear ability to request that they be removed from the list

## 6. Retention of Information

- 6.1. TCS intell retains information collected on its customers in the course of its business dealings for the normal statutory period for the retention of such information. This ensures that in the event of an issue arising relating to particular business transaction all relevant information available for its resolution.

## 7. Data Quality

- 7.1. TCS intell will take all reasonable steps to ensure that the information recorded about an individual is correct and up to date. Where an individual feels that information being held about them is incorrect and would like the information corrected then they should contact the TCS intell Privacy Officer (see below).
- 7.2. We hold personal information in a number of ways, including in hard copy documents, electronic databases, email contact lists, and in paper files held in drawers and cabinets. Paper files may also be archived in boxes and stored offsite in secure facilities. We take reasonable steps to:
  - make sure that the personal information that we collect, use and disclose is accurate, up to date and complete and (in the case of use and disclosure) relevant;
  - protect the personal information that we hold from misuse, interference and loss and from unauthorised access, modification or disclosure; and
  - destroy or permanently de-identify personal information that is no longer needed for any purpose that is permitted by the APPs.

## 8. Data Security

- 8.1. TCS intell takes data security seriously and is constantly examining its systems and practices to identify possible avenues for unauthorised use of information and taking appropriate steps.
- 8.2. Currently, TCS intell Internal systems are protected by firewalls, VPN secure tunnels, password protection and physical security. Wherever information is collected via web site passwords are used to protect information from unauthorised web based access.



## 9. Openness and Accessibility to Data

- 9.1. Where a customer has any concerns regarding information TCS intell may be storing or using they may request that copies of all information stored be provided by TCS intell.
- 9.2. The requests should be made in writing or by email to the TCS intell Marketing & Communications Manager. The TCS intell Marketing & Communications Manager will endeavour to provide copies of the information within a reasonable timeframe.
- 9.3. If a customer discovers that information held about them is incorrect or unnecessary they should contact the TCS intell Marketing & Communications Manager, preferably in writing. The TCS intell Privacy Officer will endeavour to have the corrections entered into the TCS intell systems within a reasonable time frame.

## 10. Complaints

- 10.1. If you have a complaint about how we have collected or handled your personal information, please contact the Company Chief Operating Officer (COO), who will endeavour in the first instance to deal with your complaint and take any steps necessary to resolve the matter within a week.

Please ask management if there are any queries in relation to any of the above statements.

