

# Privacy Policy

## 1. Purpose and Application

SAGE recognises the importance of protecting the personal information it collects from individuals associated with SAGE's business. The purpose of this policy is to provide an outline of the way SAGE manages personal information in accordance with the Australian Privacy Principles and the Privacy Act 1988 (Cth).

SAGE takes its obligations under the Privacy Act seriously and will take all reasonable steps to comply with the Australian Privacy Principles and the Privacy Act to protect the privacy of all personal information that it holds.

## 2. Definitions

In this policy, the following words or phrases mean:

"personal information" means information relating to an individual, including an opinion, which is provided to SAGE as part of its business relationship with others, whether the information is correct or not. The information may personally identify an individual or make the person's identity reasonably apparent.

"sensitive information" means information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, membership of a trade union, sexual practices, criminal record or health information.

"SAGE" includes SAGE Group Holdings Ltd and its related entities including Embedded Expertise.

## 3. Collection and Use of Personal Information

SAGE collects and hold personal information such as (but not limited to):

- the names of employees and proprietors of organisations and clients;
- postal and email addresses, telephone and facsimile numbers;
- financial details including bank account information and credit card numbers; and
- insurance details, education and employment history, skills and work experience and professional affiliations.

SAGE collects personal information:

- directly from you or other persons acting on your behalf;
- from third parties; and
- from publicly available sources.

SAGE may send personal information to its subsidiary in India which provides a range of internal services to SAGE and also provides services to its clients. SAGE's India subsidiary agrees to comply with this policy and the Australian Privacy Principles.

In the event that SAGE collects sensitive information, it will not be used for any purpose without your express permission.

In the event that unsolicited personal information is collected by SAGE, SAGE will take reasonable steps to destroy or de-identify that personal information.

Where possible, individuals will have the option of interacting with SAGE anonymously or using a pseudonym.

SAGE does not use government related identifiers such as Tax File Numbers or Medicare Numbers to identify individuals or the personal information that SAGE collects from individuals.

SAGE will not disclose personal information to any organisation without your prior consent.

#### **4. Purpose of Collection**

Our purpose in collecting and holding personal information about an individual is so that it can be used for activities such as:

- providing services to clients;
- engaging contractors;
- handling complaints;
- managing employee records; and
- business development and direct marketing.

SAGE may collect information for the provision of direct marketing unless you have informed SAGE in writing in accordance with section 9 of this policy that you do not want to receive such information. SAGE will provide an "opt out" option to individuals who receive direct marketing from SAGE.

SAGE may be required to provide your personal information to other organisations to comply with its legal obligations such as auditors, legal advisers, the ATO, insurers and creditors.

#### **5. Storage and Security**

All personal information collected by SAGE is retained as a part of a database that is securely monitored and maintained. The personal information will not be made available to a third party without your consent, unless SAGE is legally required to do so.

SAGE will take all reasonable steps to protect the security of the personal information that it holds. This includes taking appropriate measures to protect electronic materials and material stored and generated in hard copy.

Where personal information held by SAGE is no longer required and the law does not require it to be retained, SAGE will destroy such personal information by a secure means.

## **6. Access and Retention of Information**

You may request access to the personal information SAGE holds about you by making a written request to the Privacy Officer listed in section 9 below. SAGE will provide you with access to your personal information unless an exception to access under Australian Privacy Principle 12 applies.

In the event that any personal information that SAGE holds about you is incorrect and requires correction, SAGE will take such steps as are reasonable in the circumstances to correct that information to ensure that it is up to date, complete and accurate.

SAGE seeks to ensure that the personal information it holds is accurate, complete and up-to-date. SAGE understands that personal information changes frequently and encourages you to contact SAGE as soon as possible to update any changes to personal information. Our contact details are in section 9 below.

## **7. Disclosure to an Organisation**

SAGE may disclose personal information for the purposes set out in section 4 of this policy to its related entities, agents or contractors.

SAGE acknowledges that you have no obligation to provide it with personal information. However, if you choose not to provide SAGE with personal information, SAGE may be unable to provide you with a full range of services or it may reduce SAGE's ability to service you.

## **8. Compliance**

If you have any concerns regarding the privacy of your personal information, you may make a complaint to the Privacy Officer who will endeavor to resolve the complaint. The contact details for the Privacy Officer are in section 9 of this policy.

If you wish to make a complaint regarding SAGE's handling of your request or complaint, you may complain directly to the Office of the Australian Information Commissioner.

## **9. Contact Details**

The contact details for SAGE's Privacy Officer are:

Email: [privacyofficer@gotosage.com](mailto:privacyofficer@gotosage.com)

Postal: SAGE Privacy Officer F22, 6 MAB Eastern Promenade  
1284 South Road  
Tonsley SA 5042