

## The French Language Experts Pty Ltd & Related Entities – Privacy Policy

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### Who are we?

'We', 'us' and 'our' refer to The French Language Experts Pty Ltd (ACN 607 327 748) and any Related Entity (as that term is defined in section 9 of the *Corporations Act 2001* (Cth)).

### Our commitment to protect your privacy

We understand how important it is to protect your personal information. This document sets out our privacy policy commitment in respect of personal information we hold about you and what we do with that information.

We recognise that any personal information we collect about you will only be used for the purposes we have collected it or as allowed under the law. It is important to us that you are confident that any personal information we hold about you will be treated in a way which ensures protection of your personal information.

Our commitment in respect of personal information is to abide by the Australian Privacy Principles for the protection of personal information as set out in the *Privacy Act 1988* (Cth) (the **Privacy Act**) and any other relevant law.

### Kinds of information that we collect and hold

When we refer to 'personal information' we mean information from which your identity is reasonably apparent. This information may include information or an opinion about you.

The kinds of personal information we may collect about you include:

- your name, occupation and date of birth;
- your address, email address and phone number;
- your financial information, including your credit card details;
- details with respect to you and your business occupation; and
- any other information we may need to identify you.

### How we collect your personal information

Where reasonable and practical, we will collect your personal information directly from you including through the use of our standard forms, website or any interaction we may have with you via telephone or online. There may be occasions when we need to source personal information about you from a third party. For example, we may collect your personal information from a company for whom you work.

### Use and disclosure of your personal information

We collect personal information for the purposes of providing you with the services that you are seeking. We may also collect your personal information for the purposes of direct marketing and managing our relationship with you. From time to time we may offer you other products and services.

To enable us to maintain a successful business relationship with you, we may disclose your personal information to other organisations that provide products or services used or marketed by us. We may also disclose your personal information to any other organisation that may have or is considering having an interest in our business.

We may disclose your personal information:

- to our Related Entities to facilitate our and their internal business processes;

- to service providers that assist us to provide our services;
- to associated businesses that may want to market products to you;
- to companies that provide information and infrastructure systems to us;
- to anybody who represents you, such as lawyers and accountants (where we are required to do so by law);
- to investors, agents or advisers, or any entity that has an interest in our business;
- to your employer, referees or identity verification services, if required; and
- to anyone, where you have provided us consent.

Prior to disclosing any of your personal information to another person or organisation, we will take all reasonable steps to satisfy ourselves that:

- the person or organisation has a commitment to protecting your personal information at least equal to our commitment; or
- you have consented to us making the disclosure.

We may disclose your personal information to overseas entities that provide support functions to us. In doing so, we will take such steps as are reasonable in the circumstances to ensure that the overseas entity does not breach the Australian Privacy Principles. You may obtain more information about these entities by contacting us.

### **Sensitive information**

Sensitive information is personal information that includes information relating to your racial or ethnic origin, political persuasion, memberships in trade or professional associations or trade unions, sexual preferences, criminal record or health.

In most cases, we will only collect sensitive information about you with your consent and where the information is reasonably necessary for, or directly related to, one or more of our functions or activities.

We will not use your sensitive information for:

- a secondary purpose unless the secondary purpose is directly related to the services that you are seeking from us and it is within your reasonable expectations; or
- direct marketing unless you have consented for us to use your sensitive information for this purpose.

### **How we hold your personal information**

We understand that you may be concerned about the security of the personal information that we collect from you. We may store your personal information in paper and electronic form. Accordingly, we have a variety of physical and electronic security measures to protect any personal information from misuse, loss, unauthorised use, modification or disclosure.

We may use cloud storage to store the personal information we hold about you. The cloud storage and the IT servers may be located outside Australia. We will take such steps as are necessary in these circumstances to ensure that the cloud service operators comply with the Australian Privacy Principles.

## **Direct marketing**

From time to time we may use your personal information to provide you with current information about offers you may find of interest, changes to our organisation, or new products or services being offered by us or any company with whom we are associated.

If you do not wish to receive marketing information, you may at any time decline to receive such information by telephoning us on (+61) 448 840 067 or by writing to us at P.O. Box 3492 Norman Park, Queensland 4170. If the direct marketing is by email you may also use the unsubscribe function. We will not charge you for giving effect to your request and will take all reasonable steps to meet your request at the earliest possible opportunity.

## **Updating your personal information**

It is important to us that the personal information we hold about you is accurate and up to date. During the course of our relationship with you we may ask you to inform us if any of your personal information has changed.

If you wish to make any changes to your personal information, you may contact us. We will generally rely on you to ensure the information we hold about you is accurate or complete.

## **Access to and correction of your personal information**

We will provide you with access to the personal information we hold about you. You may request access to any of the personal information we hold about you at any time by contacting our Director by telephone on (+61) 448 840 067 or by writing to us at P.O. Box 3492 Norman Park, Queensland 4170 or e-mail to [admin@fle.com.au](mailto:admin@fle.com.au).

We may charge a fee for our costs of retrieving and supplying the information to you.

Depending on the type of request that you make we may respond to your request immediately, otherwise we usually respond to you within seven (7) days of receiving your request. We may need to contact other entities to properly investigate your request.

There may be situations where we are not required to provide you with access to your personal information, for example, if the information relates to existing or anticipated legal proceedings, or if your request is vexatious.

An explanation will be provided to you if we deny you access to the personal information we hold about you.

If any of the personal information we hold about you is incorrect, inaccurate or out of date, you may request that we correct the information. If appropriate, we will correct the personal information at the time of the request, otherwise, we will provide an initial response to you within seven (7) days of receiving your request. Where reasonable, and after our investigation, we will provide you with details about whether we have corrected the personal information within thirty (30) days.

We may need to consult with other entities as part of our investigation.

If we refuse to correct personal information, we will provide you with our reasons for not correcting the information.

## **Business without identifying you**

In most circumstances it will be necessary for us to identify you in order to successfully do business with you, however, where it is lawful and practicable to do so, we will offer you the opportunity of doing business with us without providing us with personal information, for example, if you make general inquiries about our current promotional offers.

## **Complaints Procedure**

If you are dissatisfied with how we have dealt with your personal information, or you have a complaint about our compliance with the Privacy Act, you may contact our Director by telephone on (+61) 448 840 067 or by writing to us at P.O. Box 3492 Norman Park, Queensland 4170 or e-mail to [admin@fle.com.au](mailto:admin@fle.com.au).

We will acknowledge your complaint within seven (7) days. Subsequently, we will provide you with a decision on your complaint within thirty (30) days.

If you are dissatisfied with the response of our Director, you may make a complaint to the Office of the Australian Information Commissioner which can be contacted on either [www.oaic.gov.au](http://www.oaic.gov.au) or 1300 363 992.

## **Further information**

You may request further information about the way we manage your personal information by contacting us.

## **Change in our privacy policy**

We are constantly reviewing all of our policies and attempt to keep up to date with market expectations. Technology is constantly changing, as is the law and market place practices.

As a consequence we may change this privacy policy from time to time or as the need arises.

You may request this Privacy Policy in an alternative form.

This Privacy Policy came into existence on 28 April 2016.