



## Privacy Policy

### 1. Introduction

- 1.1. EVERGENT is committed to treating the personal information we collect in accordance with the Australian Privacy Principles in the Privacy Act 1988 (Cth) (Privacy Act). This Privacy Policy sets out how EVERGENT handles personal information.
- 1.2. This Privacy Policy does not apply to personal information collected by EVERGENT that is exempted under the Privacy Act, for example, employee records.
- 1.3. EVERGENT may modify this Privacy Policy from time to time to reflect its current privacy practices.
- 1.4. In this Privacy Policy, 'EVERGENT', 'we', 'us' and 'our' is a reference to the EVERGENT business, its owner and its employees.

### 2. Personal information we collect

- 2.1. The types of personal information we collect include:
  - a) names, job titles, contact and address details
  - b) information in identification documents (for example, passport, driver's licence)
  - c) tax file numbers and other government-issued identification numbers
  - d) date of birth and gender
  - e) bank account details, shareholdings and details of investments
  - f) details of superannuation and insurance arrangements
  - g) educational qualifications, employment history, salary and referee reports
  - h) visa or work permit status
  - i) your Internet Protocol (IP) address
  - j) payment details and
  - k) personal information about your spouse and dependents.
- 2.2. It may be necessary in some circumstances for EVERGENT to collect sensitive information about you in order to provide specific services or for recruiting purposes. Examples of the types of sensitive information that may be collected in such circumstances include professional memberships, ethnic origin, criminal record and health information.
- 2.3. It is generally not practical to remain anonymous or to use a pseudonym when dealing with EVERGENT as usually, we need to use your personal information to provide specific services to you, or which relate to or involve you.

### 3. How we collect and manage personal information

- 3.1. Generally we collect your personal information from you directly (for example, when we deal with you in person or over the phone, when you send us correspondence (including via email), when you complete a questionnaire, form or survey, when you subscribe to our publications or when you use our website or our social media).
- 3.2. Sometimes it may be necessary for us to collect your personal information from a third party. For example, we may collect your personal information from your employer where they are our client, from your personal representative, or a publicly available record.
- 3.3. We may also collect personal information about you from your use of our websites and information you provide to us through contact mailboxes or through the registration process on our websites.

- 3.4. If you provide us with someone else's personal information, you should only do so if you have their authority or consent to provide us with their personal information. You should also take reasonable steps to inform them of the matters set out in this Privacy Policy.
- 3.5. EVERGENT holds personal information in electronic formats. We take security measures to protect the personal information. In some cases, EVERGENT engages third parties to host electronic data (including data in relation to the services we provide) on our behalf.

### 4. Purpose for collecting, holding, using and disclosing personal information

- 4.1. EVERGENT collects, holds and uses personal information for a number of purposes including:
  - a) to provide professional services
  - b) to provide technology services and solutions
  - c) to respond to requests or queries
  - d) to maintain contact with our clients and other contacts (including alumni), and keep them informed of our services, industry developments, seminars and other events
  - e) to verify your identity
  - f) for administrative purposes, including processing payment transactions
  - g) for recruitment purposes
  - h) for purposes relating to the employment of our personnel, providing internal services or benefits to our partners and staff and for matters relating to the business.
  - i) to manage any conflict of interest or independence (including auditor independence) obligations or situations
  - j) to conduct surveys
  - k) for seeking your feedback
  - l) to meet any regulatory obligations
  - m) as part of an actual (or proposed) acquisition, disposition, merger or de-merger of a business (including EVERGENT's business) or entering into an alliance, joint venture or referral arrangement
  - n) to perform internal statistical analysis, including of our databases and website or
  - o) for any other business-related purposes.
- 4.2. If you do not provide us with the personal information we have requested, we may not be able to complete or fulfil the purpose for which such information was collected, including providing you or our clients with the services we were engaged to perform.
- 4.3. The types of third parties to whom we may disclose your personal information include:
  - p) experts or other third parties contracted as part of an engagement
  - q) our agents, contractors and external service providers
  - r) our professional advisers
  - s) as part of an engagement, if you are a customer, an employee, a contractor or supplier of services to one of our clients, then we may disclose your personal information as part of providing services to that client

- t) as part of an actual (or proposed) acquisition, disposition, merger or de-merger of a business (including EVERGENT's business) or to enter into an alliance, joint venture or referral arrangement or
  - u) government or regulatory bodies or agencies, as part of an engagement or otherwise, (for example, the Australian Taxation Office).
- 4.4. We do not disclose personal information to third parties for the purpose of allowing them to send marketing material to you. However, we may share non-personal, de-identified or aggregated information with them for research or promotional purposes.

## 5. Disclosure of personal information

- 5.1. We may also store, process or back-up your personal information on servers that are located overseas (including through third party service providers).
- 5.2. In some circumstances, EVERGENT also uses third party service providers to carry out its functions and provide services. These service providers are typically located in India and the Philippines.

## 6. Direct marketing

- 6.1. EVERGENT may also use your personal information for the purpose of marketing its services.
- 6.2. If you do not want to receive marketing material from us, you can contact us as detailed below:
  - a) for electronic communications, you can click on the unsubscribe function in the communication or
  - b) for hard copy communications, you can email [unsubscribe@evergent.com.au](mailto:unsubscribe@evergent.com.au) or
  - c) through our contact details in 'How to contact us'.

## 7. Privacy on our websites

- 7.1. Cookies, web beacons and other technologies are used by EVERGENT and its service providers on some EVERGENT websites and through email to automatically collect certain types of information. The collection of this information allows us to customise your online experience (including tailored EVERGENT marketing), improve the performance, usability and effectiveness of EVERGENT's online presence and to measure the effectiveness of our marketing activities.
- 7.2. If you register or log into an EVERGENT website and provide information about your preferences, we will use your information to personalise your user experience. If you register or log into an EVERGENT web site using a third party account (such as LinkedIn, Google or Twitter), we may collect any information you have permitted the third party service to share, including your name and email address, depending on the privacy settings you have set with the third party service and their privacy policy.

- 7.3. An IP address is a number assigned to your computer whenever you access the internet. It allows computers and servers to recognise and communicate with one another. Public IP addresses from which visitors appear to originate may be recorded for IT security and system diagnostic purposes. This information may also be used in aggregate form to conduct website trend and performance analysis and to personalise your user experience.
- 7.4. Cookies may be placed on your computer or internet-enabled device whenever you visit us online. This allows the site to remember your computer or device and serves a number of purposes.
- 7.5. Although most browsers automatically accept cookies, you can choose whether or not to accept cookies via your browser's settings (often found in your browser's Tools or Preferences menu). You may also delete cookies from your device at any time. However, please be aware that if you do not accept cookies, you may not be able to fully experience some of our websites' features.
- 7.6. Cookies by themselves do not tell us your email address or otherwise identify you personally. In our analytical reports, we may obtain other identifiers including public IP addresses, but this is for the purpose of identifying the number of unique visitors to our websites and geographic origin of visitor trends, and not to identify individual visitors.
- 7.7. EVERGENT uses analytics tools, such as Google Analytics and Adobe Analytics. To provide website visitors with more choice on how their data is collected by Google Analytics, Google has developed the Google Analytics Opt-out Browser Add-on. The add-on communicates with the Google Analytics JavaScript (ga.js) to indicate that information about the website visit should not be sent to Google Analytics. The Google Analytics Opt-out Browser Add-on does not prevent information from being sent to the website itself or to other web analytics services. Adobe also provides a range of opt-out options for Adobe Analytics.
- 7.8. A web beacon is a small image file on a web page that can be used to collect certain information from your computers, such as an IP address, the time the content was viewed, a browser type, and the existence of cookies previously set by the same server.
- 7.9. EVERGENT or its service providers may use web beacons to track the effectiveness of third party websites that provide us with recruiting or marketing services or to gather aggregate visitor statistics and manage cookies.
- 7.10. You have the option to render some web beacons unusable by rejecting their associated cookies. The web beacon may still record an anonymous visit from your IP address but cookie information will not be recorded.
- 7.11. In some of our newsletters and other communications, we may monitor recipient actions such as email open rates through embedded links within the messages. We collect this information to gauge user interest and to enhance future user experiences.

- 7.12. EVERGENT may collect and use the geographical location of your computer or mobile device. This location data is collected for the purpose of providing you with information regarding services which we believe may be of interest to you based on your geographic location, and to improve our location-based products and services.
- 7.13. EVERGENT websites may include functionality to enable sharing via third-party social media applications, such as the Facebook Like button and the Twitter widget. These social media applications may collect and use information regarding your use of EVERGENT websites. Any personal information that you provide via such social media applications may be collected and used by other members of that social media application and such interactions are governed by the privacy policies of the companies that provide the application. We do not have control over, or responsibility for, those companies or their use of your information.
- 7.14. In addition, EVERGENT websites may host blogs, forums, crowd-sourcing and other applications or services (collectively "social media features"). The purpose of social media features is to facilitate the sharing of knowledge and content. Any personal information that you provide on any EVERGENT social media feature may be shared with other users of that social media feature (unless otherwise stated at the point of collection), over whom we may have limited or no control.
- 7.15. EVERGENT also does not endorse, approve or recommend the services or products provided on third party websites.
- 7.16. You have several choices regarding your use of EVERGENT's websites. In general, you are not required to provide personal information when you visit our websites. However, if you apply to receive information about our services, events and industry updates or wish to apply for a job, provision of certain personal information will generally be required.

## **8. Children**

- 8.1. We understand the importance of protecting children's privacy, especially in an online environment.
- 8.2. In particular, our websites are not intentionally designed for or directed at children under the age of 13.
- 8.3. It is our policy to never knowingly collect or maintain information about anyone under the age of 13, except as part of a specific engagement to provide services which necessitates such personal information be collected or for the purposes of ensuring compliance with our auditor independence policies.

## **9. Gaining access to personal information we hold**

- 9.1. You can request access to your personal information, subject to some limited exceptions permitted or required by law. Such requests must be made in writing to the EVERGENT.
- 9.2. EVERGENT may charge reasonable costs for providing you access to your personal information.

## **10. Keeping personal information current**

- 10.1. If you believe that any personal information EVERGENT has collected about you is inaccurate, not up-to-date, incomplete, irrelevant or misleading, you may request a correction.

## **11. Complaints**

- 11.1. If you wish to make a complaint to EVERGENT about our handling of your personal information, you can contact us as set out in 'How to contact us'. You will be asked to set out the details of your complaint in writing.
- 11.2. EVERGENT will endeavour to reply to you within 30 days of receipt of the completed complaint form and, where appropriate, will advise you of the general reasons for the outcome of the complaint.
- 11.3. If you are not satisfied with the outcome of your complaint, you can refer your complaint to the Office of the Australian Information Commissioner.

## **12. How to contact us**

- 12.1. If you have a query in relation to this Privacy Policy or you would like to notify EVERGENT that you no longer wish to receive marketing material from us, access or correct your personal information or to make a complaint about EVERGENT's handling of your personal information, please contact EVERGENT via the details provided on our website.