

This **Privacy Policy** has been published to provide a clear and concise outline of how and when personal information is collected, disclosed, used, stored and otherwise handled by Bowes Legal. The Policy relates to personal information collected by any means and by any technology.

Bowes Legal treats the handling of your personal information very seriously. To that end, Bowes Legal has systems and procedures in place to protect your privacy in relation to the handling of your personal information.

Bowes Legal abides by the National Privacy Principles, which provide a scheme in relation to the collection, disclosure, use and storage of personal information. Bowes Legal's objective is to handle information responsibly and provide you with some control over the way information about you is handled.

1.COLLECTION OF PERSONAL INFORMATION

Personal information is information or opinion from which an individual's identity may be ascertained. The nature of personal information collected by Bowes Legal generally comprises an individual's name and contact details (including address, phone and e-mail). Such personal information is collected for the purposes of arranging, conducting and promoting Bowes Legal's business activities.

Bowes Legal does not collect personal information unless it is necessary for Bowes Legal to perform one or more of its functions and business activities. On occasion, some of this personal information may be sensitive and Bowes Legal will only collect it with your consent or when required to by law.

Bowes Legal will destroy personal information when it is no longer required for such functions and business activities.

Bowes Legal will generally collect personal information from you directly. For example, Bowes Legal may collect personal information via telephone or letter, or when you attend a function or event, provide a resume or enter an agreement.

2.USE & DISCLOSURE OF PERSONAL INFORMATION

Personal information provided to Bowes Legal may be shared with related companies within Bowes Legal, where it will be kept strictly confidential and will only be disclosed on a need to know basis.

Bowes Legal will use and disclose your personal information for the purpose for which the personal information was initially collected.

Bowes Legal may also use that personal information for a purpose related to the initial purpose of collection if that other purpose would be within your reasonable expectations. Related purposes might include internal auditing and administration, adding your name to a contact list, guest list or invitation list or helping us to identify production and broadcast business activities or investment opportunities which may be of benefit or interest to you.

Bowes Legal will not use or disclose your personal information for any other purposes without first obtaining your express or implied consent. Bowes Legal may however be required to disclose your personal information without your consent if the disclosure is:

- required or authorised by law;
- required in order to investigate an unlawful activity;
- required by an enforcement body for investigative activities; or
- necessary to prevent a serious and imminent threat to a person's life, health or safety, or to public health or safety.

Generally, Bowes Legal will retain your personal information within Australia and not use or disclose it overseas. However, on some occasions the information may need to be transferred overseas in order to perform one of Bowes Legal's functions or activities. In these circumstances, Bowes Legal will either obtain your express or implied consent or will use its best endeavours to ensure that your personal information will receive protection similar to that which it would have if the information were in Australia.

As like most business organisations, Bowes Legal relies on third party suppliers who are contracted to conduct specialised activities such as insurance broking, supply of equipment, business services, security services and travel and hospitality services. While personal information may be provided to these suppliers in order to enable them to perform the agreed tasks, Bowes Legal will make every effort to ensure that the supplier handles the personal information in accordance with the National Privacy Principles and confidentiality principles. Bowes Legal will require all such suppliers to provide privacy undertakings and enter confidentiality agreements.

3.DIRECT MARKETING

From time to time Bowes Legal may use your personal information to identify business activities which may be of interest to you.

If you do not wish to receive direct marketing information, please let Bowes Legal know. Bowes Legal will take immediate steps to ensure that you do not receive any direct marketing information in future.

4.PERSONAL INFORMATION QUALITY

Bowes Legal's objective is to ensure that all personal information collected by us is accurate, complete and up-to-date. To assist Bowes Legal in achieving its objective, please contact us if any of your details change. Further, if you believe that the information Bowes Legal holds is not accurate, complete or up-to-date, please contact us in order to have the information corrected.

5.PERSONAL INFORMATION SECURITY

Bowes Legal is committed to keeping your personal information secure, and we will take all reasonable precautions to protect your personal information from unauthorised access, loss, misuse or alteration.

Your personal information may be stored in hard copy documents, or electronically on Bowes Legal ' software or systems.

Bowes Legal maintains physical security over its paper and electronic data stores, such as locks and security systems. Bowes Legal also maintains computer and network security using passwords to control and restrict access to authorised staff for approved purposes. Where information is particularly sensitive, the information is overwritten and then manually deleted.

6.ACCESS TO PERSONAL INFORMATION

You may request access to the personal information Bowes Legal holds about you.

The procedure for gaining access is as follows:

- All requests for access to your personal information must be made in writing and addressed to the Principal of Bowes Legal
- You must provide as much detail as possible regarding the business entity, department or person to whom you believe your personal information has been provided, and when. This will allow Bowes Legal to process your request faster
- Bowes Legal will acknowledge your request within 14 days, and access will usually be granted within 14 days, or if it is more complicated, 30 days. Bowes Legal will inform you if this timeframe is not achievable
- You will be asked to verify your identity
- A fee may apply to such access in the event that a request for access is onerous or time consuming. Such a fee will cover staff costs involved in locating and collating information, and reproduction costs
- Depending on the circumstances, you may be forwarded the information by mail or email, or you may be required to personally inspect your records at the appropriate place
- You will be given the opportunity to correct any personal information which is no longer accurate

In some circumstances, Bowes Legal may not be in a position to provide access. Such circumstances include where:

- access would create a serious threat to safety

- providing access will have an unreasonable impact upon the privacy of other individuals
- denying access is required or authorised by law
- the request is frivolous
- legal proceedings are underway
- negotiations may be prejudiced by such access
- access would reveal a commercially sensitive decision making process
- If Bowes Legal denies access to your personal information, it will provide you with reasons in writing.

7.CHANGES TO THIS POLICY

Bowes Legal may change this Policy from time to time for any reason and will update the Policy accordingly.

8.COMPLAINTS

If you believe that your privacy has been infringed you are entitled to complain. All complaints should initially be in writing and directed to the Principal. Bowes Legal will respond to your complaint as soon as possible, within 14 working days, to let you know who is responsible for managing your query. Bowes Legal will try to resolve the complaint within 30 working days. When this is not possible Bowes Legal will contact you to provide an estimate of how long it will take to handle the complaint.