

Privacy Policy

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Adopted 27 April 2023

1 Zafra Legal commitment to privacy

Zafra Pty Ltd ACN 611 458 489 trading as **Zafra Legal** is committed to managing personal information in accordance with the Australian Privacy Principles under the *Privacy Act 1988* (Cth) and in accordance with other applicable privacy laws.

This document sets out our policies for managing your personal information and is referred to as our **Privacy Policy**.

In this Privacy Policy, “we” and “us” refers to Zafra Legal and “you” refers to any individual about whom we collect personal information.

2 About Zafra Legal

Zafra Legal is a legal services firm with a range of commercial practice areas. Zafra Legal also services individuals in dispute resolution and estate planning.

Please contact us for a full list of the companies which comprise Zafra Legal and which are subject to this Privacy Policy.

3 What information does Zafra Legal collect about you?

(a) Clients and prospective clients

When you enquire about our services or when you become a client of Zafra Legal, a record is made which includes your personal information.

The type of personal information that we collect will vary depending on the circumstances of collection and the kind of service that you request from us, but may include:

- your name, e-mail, postal address and other contact details;
- identification details;
- payment details;
- tax file numbers;
- your professional details; and
- any additional personal information you provide to us, or authorise us to collect, as part of your interaction with Zafra Legal.

(b) Prospective employees or applicants

We collect personal information when recruiting personnel, such as your name, contact details, qualifications and work history. Generally, we will collect this information directly from you.

We may also collect personal information from third parties in ways which you would expect (for example, from recruitment agencies or referees you have nominated). Before offering you a position, we may collect additional details such as your tax file number and superannuation information and other information necessary to conduct background checks to determine your suitability for certain positions (for example, positions which involve working with children).

(c) Other individuals

Zafra Legal may collect personal information about other individuals who are not clients or employees. This includes people who participate in events we are involved with, individual service providers and contractors to Zafra Legal on a commercial basis. The types of personal information we collect will depend on the capacity in which you are dealing with Zafra Legal. Generally, it would include your name, contact details, and information regarding our interactions and transactions with you.

If you are participating in an event we are managing or delivering, we may take images or audio-visual recordings which identify you.

We may collect personal information about your relatives, including children and dependents (for example, when children are nominated as beneficiaries of wills we prepare).

You can always decline to give Zafra Legal any personal information we request, but that may mean we cannot provide you with some or all of the services you have requested. If you have any concerns about personal information we have requested, please let us know.

(d) Visitors to our websites

The way in which we handle the personal information of visitors to our websites is discussed below.

4 How and why does Zafra Legal collect and use your personal information?

Zafra Legal collects personal information reasonably necessary to carry out our business, to assess and manage our clients' needs, and provide services including to prepare and deliver legal advice, produce deliverables and execute transactions. We may also collect information to fulfil administrative functions associated with these services, for example billing, entering into contracts with you or third parties, verifying identity and managing client relationships.

The purposes for which Zafra Legal usually collects and uses personal information depends on the nature of your interaction with us, but may include:

- providing legal services;
- responding to requests for information and other general inquiries;
- managing, planning, advertising and administering programs and events;
- researching, developing and expanding our services;
- informing you of our activities, events, facilities and services;
- recruitment processes (including for volunteers, internships and work experience); and
- responding to enquires and complaints.

Zafra Legal generally collects personal information directly from you. We may collect and update your personal information over the phone, by email or online. We may also collect personal information about you from other sources, for example, searches of publicly available registries.

5 How does Zafra Legal interact with you via the internet?

You may visit our websites (zafralegal.com.au) without identifying yourself. If you identify yourself (for example, by providing your contact details in an enquiry), any personal information you provide to Zafra Legal will be managed in accordance with this Privacy Policy.

Zafra Legal's websites may use cookies. A "cookie" is a small file stored on your computer's browser, which assists in managing customised settings of the website and delivering content. We collect certain information such as your device type, browser type, IP address, pages you have accessed on our websites and on third-party websites. You are not identifiable from such information.

You can use the settings in your browser to control how your browser deals with cookies. However, in doing so, you may be unable to access certain pages or content on our website.

Zafra Legal's websites may contain links to third-party websites. Zafra Legal is not responsible for the content or privacy practices of websites that are linked to our website.

6 Can you deal with Zafra Legal anonymously?

Zafra Legal will provide individuals with the opportunity of remaining anonymous or using a pseudonym in their dealings with us where it is lawful and practicable (for example, when making a general enquiry). Generally, it is not practicable for Zafra Legal to deal with individuals anonymously or pseudonymously on an ongoing basis. If we do not collect personal information about you, you may be unable to utilise our services or participate in our events, programs or activities we manage or deliver.

7 How does Zafra Legal hold information?

Zafra Legal stores information in paper-based files or other electronic record keeping methods in secure databases (including trusted third party storage providers based in Australia and overseas). Personal information may be collected in paper-based documents and converted to electronic form for use or storage (with the original paper-based documents either archived or securely destroyed). We take reasonable steps to protect your personal information from misuse, interference and loss and from unauthorised access, modification or disclosure.

Zafra Legal maintains physical security over paper and electronic data stores, such as through locks and security systems at our premises. We also maintain computer and network security, for example, we use firewalls (security measures for the internet), software based security systems and other security systems such as user identifiers and passwords to control access to our computer systems.

Users of our websites are encouraged to exercise care in sending personal information via the internet using online enquiry available from our website.

We take steps to destroy or de-identify information that we no longer require.

8 Does Zafra Legal use or disclose your personal information for direct marketing?

Zafra Legal may use or disclose your personal information for the purpose of informing you about our services, upcoming promotions and events, or other opportunities that may interest you. If you do not want to receive direct marketing communications, you can opt-out at any time by contacting us using the contact details below.

If you opt-out of receiving marketing material from us, Zafra Legal may still contact you in relation to its ongoing relationship with you.

9 How does Zafra Legal use and disclose personal information?

(a) For clients

The purposes for which we may use and disclose your personal information will depend on the services we are providing you. For example, if you have engaged us to deliver a legal service, we may disclose information about you to service providers where this is relevant to our services.

(b) Disclosure to contractors and other service providers

Zafra Legal may disclose information to third parties we engage in order to provide our services, including contractors and service providers used for data processing, data analysis, registry searches, customer satisfaction surveys, information technology services and support, website maintenance/development, printing, archiving, mail-outs, and market research.

Personal information may also be shared between related and affiliated companies of Zafra Legal.

Third parties to whom we have disclosed your personal information may contact you directly to let you know they have collected your personal information and to give you information about their privacy policies.

(c) Use and disclosure for administration and management

- administering billing and payments and debt recovery;
- planning, managing, monitoring and evaluating our services;
- quality improvement activities;
- statistical analysis and reporting;
- training staff;
- risk management and management of legal liabilities and claims (for example, liaising with insurers and legal representatives);
- responding to enquiries and complaints regarding our services;
- obtaining advice from consultants and other professional advisers; and
- responding to subpoenas and other legal orders and obligations.

(d) Other uses and disclosures

We may use and disclose your personal information for other purposes explained at the time of collection or otherwise as set out in this Privacy Policy.

10 Does Zafra Legal disclose your personal information overseas?

Zafra Legal occasionally works with clients, service providers, sponsors and commercial interests across the globe. It is possible that your personal information will be disclosed to overseas recipients in these circumstances.

Unless we have your consent, or an exception under the Australian Privacy Principles applies, we will only disclose your personal information to overseas recipients where we have taken reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to your personal information.

11 How can you access or seek correction of your personal information?

You are entitled to access your personal information held by Zafra Legal on request. To request access to your personal information please contact our privacy officer using the contact details set out below.

You will not be charged for making a request to access your personal information but you may be charged for the reasonable time and expense incurred in compiling information in response to your request.

We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up-to-date. You can help us to do this by letting us know if you notice errors or discrepancies in information we hold about you and letting us know if your personal details change.

However, if you consider any personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading you are entitled to request correction of the information. After receiving a request from you, we will take reasonable steps to correct your information.

We may decline your request to access or correct your personal information in certain circumstances in accordance with the Australian Privacy Principles. If we do refuse your request, we will provide you with a reason for our decision and, in the case of a request for correction, we will include a statement with your personal information about the requested correction.

12 What should you do if you have a complaint about the handling of your personal information?

You may contact Zafra Legal at any time if you have any questions or concerns about this Privacy Policy or about the way in which your personal information has been handled.

You may make a complaint about privacy to the privacy officer at the contact details set out below.

The privacy officer will first consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint. We will generally respond to your complaint within a week.

If your complaint requires more detailed consideration or investigation, we will acknowledge receipt of your complaint within a week and endeavour to complete our investigation into your complaint promptly. We may ask you to provide further information about your complaint and the outcome you are seeking. We will then typically gather relevant facts, locate and review relevant documents and speak with individuals involved.

In most cases, we will investigate and respond to a complaint within 30 days of receipt of the complaint. If the matter is more complex or our investigation may take longer, we will let you know.

If you are not satisfied with our response to your complaint, or you consider that Zafra Legal may have breached the Australian Privacy Principles or the Privacy Act, a complaint may be made to the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992 or by using the contact details on the website www.oaic.gov.au.

13 How changes are made to this Privacy Policy?

Zafra Legal may amend this Privacy Policy from time to time, with or without notice to you. We recommend that you visit our website regularly to keep up to date with any changes.

14 How can you contact Zafra Legal?

The contact details for Zafra Legal are:

Zafra Legal
Attn: Privacy Officer
Level 10
105 St Georges Tce
PERTH WA 6005

privacy@zafralegal.com.au
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This Privacy Policy was last updated in April 2023.