



Privacy Policy

Pragma Legal

Tel: (08) 6188 3340

Fax: (08) 9381 5415

www.pragmalegal.com.au

Level 1/254 Rokeby Road
Subiaco WA 6008

CONTENTS

1.	PURPOSE OF POLICY	3
2.	COLLECTION	3
3.	USE AND DISCLOSURE	4
4.	INFORMATION ABOUT EVENTS, THE WEBSITE AND OUR SERVICES	5
5.	ACCESS AND CHANGES.....	5
6.	COMPLAINTS PROCESS	5
7.	STORAGE AND SECURITY OF YOUR PERSONAL INFORMATION	6
8.	CHANGES TO THIS PRIVACY POLICY	6
9.	CONTACT US	6

1. Purpose of Policy

The Pragma Legal Privacy Policy applies to the collection, use, disclosure and handling of personal information by Pragma Legal (also referred to as **We** or **Us**), including personal information collected via our www.pragmalegal.com.au website (**Website**) and in the course of dealing with our clients.

Pragma Legal is committed to protecting the privacy of individuals and is bound by the Australian Privacy Principles set out in the *Privacy Act 1988* (Cth) (**Act**). We will only collect, use or disclose personal information in accordance with the Act and this Privacy Policy.

2. Collection

Pragma Legal collects personal information from you in a number of different ways. We may collect personal information directly from you or in the course of our dealings with you, for example when you:

- provide personal information to us;
- apply for a position of employment with us; and
- contact and correspond with us, for example to ask for information.

We may also, if you consent, collect personal information about you from another legal entity, from publicly available sources of information, or in some cases, from third parties including government departments, courts, your insurer, a company in which you are a shareholder or officeholder, your employer, or a family member you have authorised to deal with us.

The personal information we collect about you may include (but may not be limited to):

- your name, date and place of birth, contact details such as your address, email address and phone number;
- your occupation and education/work history, employer, professional memberships;
- your legal and industry areas of interest;
- your Internet Protocol (IP);
- your driver's license, passport details or other identifying document(s); and
- information relevant and relating to your dealings with Pragma Legal and our clients, such as correspondence.

We may also collect sensitive information about you, including health information, financial information and criminal background checks.

The purposes for which we collect your information may include:

- verifying your identity;
- contacting you (including via electronic messaging such as SMS and email, by mail, by phone or in any other lawful manner);
- providing you with legal services or legal information;
- undertaking conflict checks for our own purposes and the purpose of determining if we can represent a client or potential client;
- acting for a client when it acquires a business with employees;
- acting for a client in litigation against an individual;
- acting for a client in a matter against an individual (eg an employment matter); and
- developing and improving our services and obtaining feedback.

If we are not able to collect personal information about you we may not be able to provide you with products, services and assistance to the extent that they require us to collect, use or disclose personal information.

Personal information we collect will not be kept for longer than is necessary for the purpose it was collected. We are subject to legal and regulatory requirements to retain client files for a specified period of time, which will include personal information.

3. Use and Disclosure

Pragma Legal may use or disclosure your personal information for the purpose for which it was collected and in accordance with Australian law, such as:

- to provide legal services to our clients, to manage and account for those services, and to improve those services;
- to manage our relationships with our clients and suppliers and with businesses and others who we believe might become clients or suppliers;
- to promote Pragma Legal to our clients and individuals who may be interested in our services either for the business with which they are associated or personally and to provide them with information about legal developments, events or other products or services that may interest them, by way of direct marketing and otherwise;
- to facilitate our internal business operations, including to fulfil our legal requirements and professional obligations, to support and manage our employees, to protect our property and premises, to prevent and investigate crime or possible crime, and to provide information to external service providers so that they can provide financial, administrative or other services in connection with the operations of our business; and
- to communicate with others for one or more of those purposes.

We will also use and disclose your personal information for a secondary purpose that is related to a purpose for which we collected it, where you would reasonably expect us to use or disclose your personal information for that secondary purpose.

Other instances when we may use and disclose your personal information include:

- where you have expressly or impliedly consented to the use or disclosure;
- in confidence, to our advisers and insurers;
- in confidence, to third parties to improve our services and obtain feedback; and
- where the use or disclosure is authorised or required by or under an Australian law or court/tribunal order.

We may also disclose your personal information to third parties, including:

- share your personal information with our advisors and consultants; and
- with third party service providers we use in conducting our business, subject to confidentiality provisions as we deem appropriate (including, without limitation, insurance brokers, banks, external photocopying providers, document production, legal outsourcing providers, billing or data storage services, email filtering, virus scanning and other technology services providers, and archival services providers).

Some of the third parties to whom we disclose your personal information may be located outside Australia.

For example, we may disclose your personal information to external national or overseas

facilities in the course of conducting information and data processing, back up and scanning or for the purposes of obtaining other services from third parties.

The countries in which these third parties are located will depend on their circumstances.

4. Information about events, the Website and our services

We may contact you via email, SMS or other means in order to provide you with updated information about the Website, in relation to events or to provide you with other information about our services. If you do not wish to receive any such information, please contact us as set out below.

5. Access and Changes

You have a right to request access to or correction of your personal information held by us. If you wish to access, correct or update any personal information we may hold about you, please contact us as set out below. However, we may charge for providing access to this information and we may refuse access where the Act allows us to do so. If we refuse you to access or correct your information for a valid reason, we will advise of the reason(s) at the time of your request.

6. Complaints process

If you have any questions or concerns about our collection, use or disclosure of personal information, or if you believe that we have not complied with this Privacy Policy or the Act, please contact us as set out below. The Privacy Officer will investigate the complaint and determine whether a breach has occurred and what action, if any, to take. When contacting us, please provide as much detail as possible in relation to the query, issue or complaint.

We will take any privacy complaint seriously. We will aim to resolve any such complaint in a timely and efficient manner, and our target response time is 30 days. We request that you cooperate with us during this process and provide us with relevant information we may require.

We expect our procedures will deal fairly and promptly with your complaint. However, if you remain dissatisfied, you can also make a formal complaint with the Office of the Australian Information Commissioner (which is the regulator responsible for privacy in Australia):

Office of the Australian Information Commission (OAIC)

Complaints must be made in writing:

Phone	1300 363 992
Mail	Director of Compliance Office of the Australian Information Commissioner GPO Box 5218 Sydney NSW 2001
Website	www.oaic.gov.au

7. Storage and security of your personal information

Pragma Legal will take reasonable steps to keep any personal information we hold about you secure. Pragma Legal fosters a security aware culture. We also have a regular review program of our compliance with Quality Standard security measures. However, except to the extent liability cannot be excluded due to the operation of statute, Pragma Legal excludes all liability (including in negligence) for the consequences of any unauthorised access to your personal information. Please notify us immediately if you become aware of any breach of security.

We may store your files in hard copy or electronically in our ordinary IT systems. These may include Australian-based cloud servers or the servers of third parties within Australia.

We implement a range of physical and electronic security measures to protect the personal information that we hold, including:

- key access to all offices;
- mandatory password protection on all computers and file management software;
- hardware encryption on desktops and portable devices including storage devices;
- secure hard copy document, electronic storage media and hardware disposal procedures;
- firewall and antivirus/malware software; and
- secure off-site storage for records management.

Following the conclusion of a matter we will return all original documents to you. The file will be archived in secure off-site storage and will be accessible only by Pragma Legal. We are required to keep the file for seven years for record management. Pragma Legal has a policy of keeping all files for eight years.

8. Changes to this Privacy Policy

The date of this Privacy Policy is set out below. We may change this Privacy Policy at our discretion. By continuing to use the Website, or otherwise continue to deal with us, you accept this Privacy Policy as it applies from time to time.

9. Contact us

Please direct any privacy issues or queries to the Pragma Legal Law Practice Director on (08) 6188 3340 or info@pragmalegal.com.au.

Privacy Policy last updated: *1 October 2015*.