

## About this Privacy Policy

Groundwork Plus Pty Ltd trading as GPlus Live is committed to respecting your right to privacy and protecting your personal information.

We are bound by the *Privacy Act 1988* (Cth) (**Act**) and the Australian Privacy Principles set out in the Act.

We will ensure that all officers, employees and subcontractors are aware of and understand GPlus Live's obligations as well as their own obligations under the Act. We will achieve this through the provision of training and through maintaining and implementing internal policies and procedures to prevent personal information from being collected, used, disclosed, retained, accessed or disposed of improperly.

This Policy applies to all your dealings with us, whether in person, or via telephone, email, correspondence, on our website or through the GPlus Live product.

For the purpose of this Policy, the following terms will have the following meanings, as attributed to them by section 6 of the Act:

**Personal information** means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not.

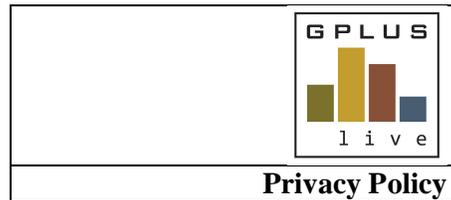
## Collection of Personal Information

Whenever you deal with GPlus Live, whether as a current or prospective client, we will collect personal information in order to provide services to you. We do not collect personal information unless it is reasonably necessary for, or directly related to, one or more of the services we provide or functions we carry out.

We will, if it is reasonable or practicable to do so, collect your personal information directly from you. This may happen when you fill out a form or when you give us personal information in person, or via telephone, email, correspondence or our website.

Sometimes we will collect personal information from a third party or a publicly available source. For example, we may need to collect personal information from a credit reporting agency.

If we receive personal information that we did not solicit, we will determine as soon as reasonably practicable whether we could have lawfully collected that information as part of our functions or activities. If we are not satisfied that we could have lawfully collected the information, then we will (if it is lawful and reasonable) destroy the information or ensure that it is de-identified.



You may choose to deal with us anonymously or under a pseudonym where lawful and practical. Where anonymity or use of a pseudonym will render us unable to provide the relevant service or do business, we may request that you identify yourself.

For example, whenever documents are to be submitted to government agencies or financial institutions, it is essential that we record your name accurately.

## **Use and Disclosure of Personal Information**

Personal information collected by GPLUS Live will ordinarily be used for the following purposes:

- Providing any services to you associated with the GPLUS Live product.
- Recording or accessing information at governmental agencies.
- Recording or accessing information on internal databases.
- Client and business relationship management.
- Marketing of products and services to you.

In order to achieve the purposes described above, we may disclose your personal information to the persons/organisations described below:

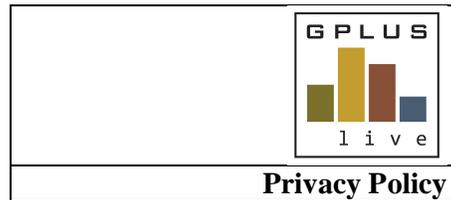
- Organisations involved in maintaining, reviewing and developing our business systems, procedures and infrastructure including maintaining or upgrading our computer systems.
- Organisations involved in the payments systems including financial institutions, merchants and payment organisations.
- Government agencies.

We will only use and disclose personal information for the primary purpose for which it was initially collected, or for purposes which are directly related to one of our functions or activities.

We will not disclose your personal information to government agencies, private sector organisations or any third parties unless one of the following applies:

- You have consented.
- You would reasonably expect, or you have been told, that information of that kind is usually passed to those individuals, bodies or agencies.
- It is otherwise required or authorised by law.
- It is reasonably necessary for enforcement related activities conducted by, or on behalf of, an enforcement body (eg. police, ASIC, Department of Environment and Science).

Personal information provided to GPLUS Live may be shared with its related companies. We will take all reasonable and practical measures to keep such information strictly confidential.



GPlus Live may transfer your personal information to overseas countries in order to perform one or more of our functions or activities. In these circumstances, we will take reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to the information.

Like many other businesses in Australia, GPlus Live may rely on third party suppliers or contractors to provide specialised services such as web hosting, cloud computing technology and data storage services. If personal information is provided to these suppliers and contractors in order to enable them to perform the agreed tasks, we will make every effort to ensure that the supplier or contractor handles the personal information in accordance with the Act and the Australian Privacy Principles.

### **Marketing our products and services**

GPlus Live may use or disclose your personal information to let you know about products and services in which you may be interested. You can contact us at any time if you no longer wish us to market our products and services to you (see the **Contacting Us** section for more information).

### **Accuracy of Personal Information**

GPlus Live will take reasonable steps to ensure that all personal information it collects, uses or discloses is accurate, complete and up-to-date.

If you believe your personal information is not accurate, complete or up-to-date, please contact us (see the **Contacting Us** section for more information).

### **Security**

Your personal information may be stored in hard copy documents or electronically. GPlus Live is committed to keeping your personal information secure and safe.

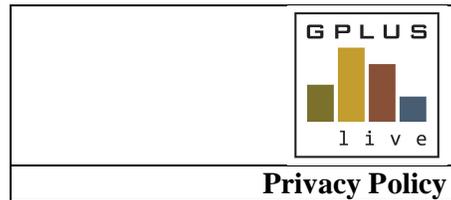
We will review and update our security measures from time to time.

In addition, we will review the personal information held by us from time to time, ensuring that information which is no longer needed for a purpose for which it was initially collected is destroyed or de-identified.

### **Your Privacy on the Internet**

GPlus Live takes care to ensure that the information you provide to us via our website is protected.

You may be able to access external websites by clicking on links we have provided. Those other websites are not subject to our privacy standards, policies and procedures. You will need to contact or review those websites directly to ascertain their privacy standards, policies and procedures.



## Access to Personal Information

You may request access to personal information that GPlus Live holds about you (see the **Contacting Us** section for more information).

You will need to verify your identity before access to your personal information is granted.

Once your request has been processed by GPlus Live, you may be forwarded the information by mail or email or you may personally inspect it at the location where the information is held or another appropriate place. Whenever possible, we will endeavor to make the information available to you in the manner requested by you unless it is unreasonable for us to do so.

If you are aware that we hold personal information about you that is no longer accurate, complete or up-to-date, please contact us (see the **Contacting Us** section for more information).

If you request access to your personal information, or if you request that we correct your personal information, we will allow access or make the correction unless we consider that there is a sound reason to withhold the information, or not make the correction.

## Contacting us

You may contact us by mail, email or telephone as follows:

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PO Box 1779, Milton BC QLD 4064

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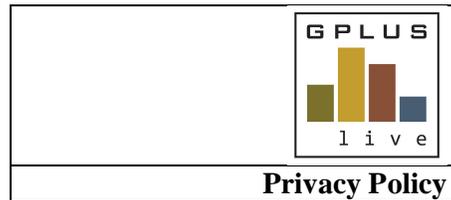
[gpluslive@groundwork.com.au](mailto:gpluslive@groundwork.com.au)

(

(07) 3871 0411

## Complaints

If you consider that there has been a breach of the Australian Privacy Principles, you are entitled to complain to GPlus Live (see the **Contacting Us** section for more information).



We will acknowledge receipt of a complaint within 2 business days.

We will investigate the complaint and attempt to resolve it within 20 business days after the complaint was received. Where it is anticipated that this timeframe is not achievable, we will contact you to provide an estimate of how long it will take to investigate and respond to the complaint.

If you consider that we have not adequately dealt with a complaint, you may complain to the Office of the Australian Information Commissioner on the below details:

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Officer of the Australian Information Commissioner (OAIC)  
GPO Box 5218  
SYDNEY NSW 2001

:  
[enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

(  
1300 363 992

## **Review**

This policy is to be reviewed as follows:

- Annually as a minimum.
- Following an information security incident.
- Following significant changes to our systems.
- Following changes to the relevant State and Commonwealth legislation

Reviews are to examine the appropriateness of the policy taking into consideration corporate, system and compliance requirement changes since the last review was undertaken.

The most up-to-date version of GPlus Live's Privacy Policy will be available on our website: <https://gpluslive.com.au/>