

Wotton + Kearney Global Data Privacy Policy

1 July 2018

Commitment to Data Privacy Protection

At Wotton + Kearney (W+K), we recognise the importance of individuals' privacy and are committed to compliance with all applicable country-specific data privacy laws. Protecting the privacy and security of your Personal Data is of the highest importance to W+K and we conduct our business accordingly.

This Global Data Privacy Policy tells you about W+K's policies and practices for the collection, use, processing, storage, transfer, and disclosure of information that we may collect about you through our sites and services, including, but not limited to the Website or subdomains of **www.wottonkearney.com.au** and **www.wottonkearney.com**.

Before using our sites and services, you will be asked to provide your authorisation and consent, agreeing to the terms of this Global Data Privacy Policy and consenting to the processing of information about you as described here and in compliance with relevant data protection laws. The collection, use, storage, transfer and disclosure of your Personal Data will be strictly limited to the terms for which you provide your authorisation. For the purpose of this policy, the reference to Personal Data includes the terms "personal information" and "personally identifiable information."

W+K's commitment to compliance is illustrated through our global data privacy compliance program consisting of transparency, the implementation of unambiguous authorisations and consents, data processing agreements, model contracts/transfer agreements, privacy principles, privacy statements, privacy policies, and country-specific registrations and filings. This privacy policy covers the Websites **www.wottonkearney.com.au** and **www.wottonkearney.com** and all other applicable W+K Sites.

Personal data

Through our Websites, W+K will not collect any Personal Data about you (e.g. your name, address, position, company name, telephone number or e-mail address), unless you voluntarily choose to provide us with it, provide your explicit consent, or unless otherwise permitted by applicable laws and regulations for the protection of your Personal Data.

Purpose of Use

When you do voluntarily provide us with Personal Data, we will use it to respond to your inquiry, process your requests, register you for an event, provide you with alerts, newsletters and articles when you subscribe to our mailing lists, provide information related to W+K services and future events, offer you the opportunity to participate in surveys, or provide you access to additional information or services. Also, to support our client relationship with you:

- we may store and process Personal Data and share it with our subsidiaries and our worldwide affiliates including firms in our Legalign Global network (W+K affiliates) to better understand your business needs and how we can improve our services; or
- we (or a third party on our behalf) may use Personal Data to contact you about a W+K service in support of your business needs or to conduct online surveys to understand better our clients' needs.

If you choose not to have your Personal Data used to support our client relationship (especially direct marketing or market research), we will respect your choice. We do not sell or otherwise market your Personal Data to third parties, except to W+K affiliates.

Information That We Collect and Use

We collect personal information from you when you request information about W+K through our Websites. Examples of personal information are name, address, telephone number, e-mail address, company name, position and any other contact details you willingly provide to us. For a complete list of all data elements that we collect and the use of those data elements, contact us at privacyofficer@wottonkearney.com.au.

We collect Personal Data about those who communicate with us such as e-mail address, user-specific information on what pages visitors access or visit, and information volunteered by the visitor, such as survey information, employment applications and site registrations. This information is used to personalise our communications with you about services that are specific to your needs and interests. Rather than burden you with information that is not relevant or of interest to you, we try to target information that is specifically important to you. No Personal Data is collected, used, accessed, stored, transferred or distributed without your explicit authorisation. At any time, even after you have given authorisation, you can opt out of receiving these communications by contacting

us at privacyofficer@wottonkearney.com.au or by clicking on our “Unsubscribe” link.

We use the information that we collect to improve the content of our Web pages by incorporating information that is relevant to our clients, to notify clients about updates to our Website, to contact clients for marketing and sales purposes that are related specifically to their needs and interests, to track applicants for career opportunities, and to communicate with our partners. This information is not shared with other organisations for any reason, commercial or business, without your prior explicit consent.

If you browse and/or apply for jobs in the Careers portion of our Website, your application and any additional information that you provide may be used to assess your skills and interests against career opportunities at W+K, and for reporting purposes as may be required by Australian or New Zealand law or other applicable country-specific laws. This usage is covered in the initial authorisation that you provide to W+K. When you access our recruitment site, you are asked to provide your authorisation for us to collect, use, process, store, transfer and distribute your Personal Data before you enter any Personal Data. We use your information to communicate with you and to inform you of career opportunities.

W+K does use third-party entities to provide valuable services on our behalf. To provide these services to you, we need your explicit consent to share your Personal Data with them. Third parties with which we share your information are bound by all relevant data privacy laws, terms of confidentiality, our Data Processing Agreement, and this Global Data Privacy Policy. All of our approved third-party providers go through a data protection compliance vetting process before being selected as a third party provider. For a complete list of these third parties and the services they provide, contact us at privacyofficer@wottonkearney.com.au.

W+K does not share, sell, rent, or trade Personal Data with third parties for their promotional purposes or for any purposes without your explicit consent. If you do not want to receive e-mails from us in the future, you may opt out at any time by clicking on the unsubscribe link below or you may contact privacyofficer@wottonkearney.com.au. W+K follows the country-specific requirements to implement the opt-out within the legally allowed time period.

W+K also offers a partial opt-out option. This option allows you to choose the data elements you want to provide and those you do not through our preference management

system. For more information about opting out of providing certain data elements, contact us at privacyofficer@wottonkearney.com.au.

If you supply us with your:

- postal address online, as well as your consent, you may receive periodic mailings from us with information about new services or upcoming events.
- telephone number online, and provide consent, you may receive telephone calls from us with information about our services or upcoming events.

If you do not want to receive such mailings or telephone calls at any point after your consent has been given, contact us at privacyofficer@wottonkearney.com.au. If you opt out, we will remove your name from all lists that we use internally and/or share with W+K affiliates. W+K follows the country-specific requirements to implement the opt-out within the legally allowed time periods.

Upon request, W+K offers visitors to our Website the ability to have their information deleted or corrected for inaccuracies. To have your information corrected, contact us at privacyofficer@wottonkearney.com.au or update your details via our preference management system at the link below. We will respond to your request within the country-specific time frames, which can range from 5 business days.

We will retain your personal information for the length of time needed to fulfill the purposes outlined in this privacy policy and/or in accordance with applicable data retention regulations.

For each visitor to our Web page, our Web server automatically recognises only the visitor's domain name, but not the e-mail address.

Purpose Limitation

W+K will collect, use or disclose Personal Data supplied by you online only for the purposes disclosed to you, unless the disclosure:

- is a use of the Personal Data for any additional purpose that is directly related to the original purpose for which the Personal Data was collected;
- is necessary to prepare, negotiate and perform a contract with you;
- is required by law or the competent governmental or judicial authorities;

- is necessary to establish or preserve a legal claim or defence; or
- is necessary to prevent fraud or other illegal activities, such as wilful attacks on W+K information technology systems.

Communications or Utilisation Data

Through your use of telecommunications services to access our Web site, your communications data (e.g. Internet protocol address) or utilisation data (e.g. information on the beginning, end and extent of each access, and information on the telecommunications services you accessed) are technically generated and could conceivably relate to Personal Data. To the extent that there is a compelling necessity, the collection, processing and use of your communications or utilisation data will occur and will be performed in accordance with the applicable data privacy protection legal framework.

Non-Personal Data Collected Automatically

When you access our Web sites, we may automatically (i.e., not by registration) collect non-Personal Data (e.g. type of Internet browser and operating system used, domain name of the Web site from which you came, number of visits, average time spent on the site, pages viewed). We may use this data to monitor the relevancy of our Web sites and improve their performance or content.

"Cookies" - Information Stored Automatically on Your Computer

Propensity management is the management of an individual's inclination or natural tendency toward certain interests, products, needs, and so on. In order to tailor our communications with you to make sure that we are addressing your specific needs and not overwhelming you with unwanted information, we use cookies to handle propensity management. A cookie is a piece of information that is stored on your computer's hard drive by your Web browser. When you revisit wottonkearney.com.au or wottonkearney.com, our server recognises the cookie, giving us information about your last visit. Most browsers accept cookies automatically, but you can alter the settings of your browser to prevent automatic acceptance. If you choose not to receive cookies, you can still use most of the features of our Website, including ordering publications.

This privacy statement covers the use of propensity management by this site only and does not cover the use of propensity management by any advertisers. We work with companies that use third-party cookies and Web beacons to collect anonymous information

that helps us measure and improve our content and advertising effectiveness. This data is collected only in aggregate form.

W+K complies with all global regulations regarding the use of cookies. Visitors to our site are asked to provide their consent before we place any cookies on your device. For detailed information regarding W+K's use of cookies, please contact privacyofficer@wottonkearney.com.au.

Clear Gifs (Web Beacons, Web Bugs)

We employ a software technology called clear gifs (also known as Web beacons or Web bugs) along with other technologies such as e-tags, and javascript that help us better manage content on our site by informing us what content is effective. Clear gifs are tiny graphics with a unique identifier, similar in function to cookies that are used to track the online movements of Web users. In contrast to cookies, which are stored on a user's computer hard drive, clear gifs, which are about the size of a period, are embedded invisibly on Web pages. We do not tie the information gathered by clear gifs, e-tags, or javascripts to our clients' personally identifiable information.

Children

W+K will not knowingly collect Personal Data from children without insisting that they seek prior parental consent if required by applicable law. We will only use or disclose Personal Data about a child to the extent permitted by law, to seek parental consent pursuant to local law and regulations or to protect a child. The definition of "child" or "children" should take into account applicable laws as well as national and regional cultural customs.

Security

To protect your Personal Data against accidental or unlawful destruction, loss or alteration and against unauthorised disclosure or access, W+K uses technical and organisational security measures.

Links to Other Web Sites

W+K Web sites contain links to other Web sites. W+K is not responsible for the privacy practices or the content of other Web sites.

Data Security Breaches

To protect your Personal Data from unauthorised access and use, or accidental loss and destruction, W+K has implemented strict security controls and intrusion detection software to notify us in the case of any potential or actual invasion of our systems. We have implemented a Data Breach Notification Policy and Remediation Plan and have established an Incident Response Team that has been trained to react immediately to any unauthorised access of our databases and systems. Should any data security breach occur that negatively impacts your Personal Data, you will be notified as soon as possible once the breach has been determined.

Right to Be Forgotten

W+K is committed to taking all reasonable steps necessary to ensure that any data you request to be forgotten and can be erased with existing technology will be done so. W+K will do everything technically possible to erase your data if you feel it is being held for longer than needed or if you withdraw your consent to receive information from us and request the right to be forgotten. However, W+K will not be able to erase your data if:

- it is technically impossible;
- for legal reasons (if mandated by local law); or
- is needed to perform our contractual obligations

Questions and Comments

W+K will respond to reasonable requests to review your Personal Data and to correct, amend or delete any inaccuracies. If you have any questions or comments about the W+K Global Data Privacy Policy (e.g. to review and update your Personal Data), please contact us at:

T: + 61 2 8273 9900

E: privacyofficer@wottonkearney.com.au

M: Privacy Officer,
Wotton + Kearney,
85 Castlereagh Street,
SYDNEY, NSW 2000

As the Internet, technology and our systems mature, so will our Global Data Privacy Policy. We will post changes to our Global Data Privacy Policy on this page and will take steps to notify you of material changes to this policy by posting a notice on **www.wottonkearney.com.au** or **www.wottonkearney.com**. Please check this page regularly to keep up-to-date.