

**Privacy Policy**

Last updated: December 2024

At C2 Operations, we are committed to protecting your privacy and treating the information we collect in accordance with the Australian Privacy Principles in the Privacy Act 1988 (Cth.) (**the Privacy Act**).

We use the information we collect about you to maximise the services that we provide to you. This Privacy Policy sets out how we handle personal information.

In this Privacy Policy, ‘C2 Operations’, ‘we’, ‘us’ and ‘our’ refer to C2 Operations Pty Ltd.

We may need to update this Privacy Policy from time to time to reflect our current privacy practices or changes in the law, regulations and/or professional standards.

When we make any changes to this Privacy Policy, we will post the updated policy on our website.

1. **INFORMATION WE COLLECT FROM YOU**

The types of personal information we collect depends on the nature of our engagement with you.

Examples of personal information we may collect include:

* General identification information such as names, job title, occupation, date of birth and gender.
* Contact details such as address, email address, phone and mobile phone number and Internet Protocol (‘IP’) address.
* Usernames and passwords.
* Educational qualifications, employment history, salary and referee reports.
* Payment details including PAYG Payment Summaries, pay slips, and other income earning information, for example payment summaries from your employer and super fund, statements from banks and financial institutions showing interest received, employment termination payment summaries, receipts for gifts, donations and work-related expenses.
* Information contained in identification documents such as passport or driver’s licence.
* Government-issued identification numbers such as tax file numbers.
* Financial information such as credit card and bank account details, shareholdings and details of investments (e.g. if you have shares, units, managed funds or other investments, details of dividend payments and distributions from managed funds, any investment gains or losses from the disposal of shares, units and rental properties, including associated income and expenditure).
* Details of superannuation and insurance arrangements.
* Visa or work permit status and related information.
* Information about immigration status.

It may be necessary in some circumstances for us to collect some forms of sensitive information about you in order to provide specific services to you. Sensitive information includes information about a person’s race, gender diversity, sexual orientation, disability, ethnic origin, political opinions, health, religious or philosophical beliefs and criminal history. We will only collect and use sensitive information with your consent, in accordance with applicable laws or in a de-identified aggregated manner.

You might need to provide personal information about other individuals to us (e.g. about your spouse, dependents or other family members or employees). If so, we rely on you to have informed those individuals that you are giving their personal information to us, to have advised them about this Privacy Policy and how they can obtain a copy of it and that you have the necessary authority to provide that personal information to us.

It is important to be aware that if you access another party’s website or application using one of our products or services or via our website, that other party will deal with your personal information in accordance with its own Privacy Policy. You will need to review those websites to view a copy of the relevant Privacy Policy.

It is generally not practical to remain anonymous or to use a pseudonym when dealing with us as usually we need to use your personal information to provide specific services to you, or which relate to or involve you.

1. **COLLECTING PERSONAL INFORMATION**

Generally we collect your personal information from you directly, for example, when we deal with you in person or over the phone, when you send us correspondence (including via email), when you complete a questionnaire, form or survey or when you subscribe to our publications.

Sometimes we will collect your personal information from outside sources. These can include marketing mailing lists and other public information (including public posts to social networking sites such as LinkedIn and Twitter) and commercially available personal, identity, geographic and demographic information. Outside sources may also include information gained from a third party. For example, we may collect your personal information from:

* your employer or previous employer, your referees,
* your personal representatives, a financial advisor, and/or
* where you have authorised disclosure to us, from banks, or
* where you have applied for a job, from other persons, such as law enforcement agencies, the Department of Home Affairs, education or other institutions or professional organisations.

We may also collect personal information about you from your use of our websites and social media and information you provide to us through contact mailboxes.

1. **HOLDING PERSONAL INFORMATION**

We hold personal information in both hard copy and electronic formats. In some cases, we engage third parties to host electronic data (including data in relation to the services we provide) on our behalf. We take security measures to protect the personal information we hold which includes physical controls (for example, security passes to enter our offices and storage of physical records in lockable cabinets) as well as technological controls (for example, restriction of access, firewalls, the use of encryption, passwords and digital certificates).

We also have policies and processes which govern document retention and data breach incidents. We endeavor to ensure that personal information is kept as current as possible, and that irrelevant or excessive data is deleted or made anonymous as soon as reasonably practicable. However, some personal information may be retained for varying time periods in order to comply with legal and regulatory obligations and for other legitimate business reasons.

1. **PURPOSE FOR COLLECTING, HOLDING, USING AND DISCLOSING PERSONAL INFORMATION**

We will only use your information if we have a lawful reason to do so such as when it’s our legal duty if we have your consent and when it’s in our legitimate interest to do so. Reasons include:

* To provide our services to you or to our client in accordance with the terms of any engagement letter, service agreement or employment agreement including any related reasons such as payroll, tax, superannuation and accounting services.
* To provide, improve and properly manage our products and services:
	+ developing new products,
	+ responding to requests or queries,
	+ verifying your identity,
	+ to conduct surveys, and
	+ seeking your feedback.
* To maintain contact with our clients and other contacts (including alumni), and keep them informed of our services, industry developments, seminars and other events.
* For administrative purposes, including:
	+ processing payment transactions,
	+ charging and billing,
	+ detecting or preventing fraud, and
	+ identifying breaches of our terms and conditions of engagement.
* For purposes relating to the employment of our personnel (including Partners), or our Clients’ personnel, contractors and sub-contractors including:
	+ recruitment purposes such as pre-employment screening, contacting referees, processing applications, administering psychometric testing, assessment for suitability for future positions, background checks and ongoing analytic purposes such as ensuring we are reaching a diverse range of candidates,
	+ providing internal services or benefits to our Partners and staff, and
	+ matters relating to Partnerships.
* For governance and compliance purposes including:
	+ managing any quality, conduct or risk management issues including conflict of interest or independence (including auditor independence) obligations or situations,
	+ meeting regulatory obligations, and
	+ where we are required to or authorised by legislation or industry code, direction or standard to do so.
* For business purposes such as part of an actual (or proposed) acquisition, disposition, merger or de-merger of a business (including our business) or entering into an alliance, joint venture or referral arrangement.
* For development and analytics purposes to develop our expertise and know how, including:
	+ for benchmarking purposes,
	+ development, analytics and business intelligence functions including web site trend and performance analysis.
	+ quality assurance and thought leadership, and
	+ other purposes related to our business.

We may also use non-personal, deidentified and aggregated information for several purposes including for data analytics, research, submissions, thought leadership and promotional purposes. Any output is deidentified or aggregated so that no personal information or information relating specifically to you is reasonably identifiable.

C2 Operations may also use your personal information for the purpose of marketing its services to you. This may include products, services and offers provided by our partners. If you do not want to receive marketing material from us, you can contact us.

1. **SHARING PERSONAL INFORMATION**

We may share your personal information with other parties including:

* Your authorised representatives, advisors and referees,
* Personnel within C2 Operations and our professional advisors,
* Experts or other third parties contracted as part of an engagement,
* Our agents, third party contractors and suppliers that assist us with providing our business processes and products and services,
* Nominated superannuation funds,
* Other MJG member firms (which includes entities they wholly or dominantly own and control) or MJG International Limited and its affiliates,
* Third parties as part of an actual or proposed acquisition, disposition, merger or de-merger of a business (including C2 Operations) or to enter into an alliance, joint venture or referral arrangement,
* Other parties including government or regulatory bodies (for example, the Australian Taxation Office, the Australian Securities Investment Commission and The Department of Home Affairs), professional or industry bodies or agencies, as part of an engagement or as required by or in accordance with any industry code or industry standard including foreign authorities or regulators relevant or applicable for the purposes of our provision of services, or
* Other parties when you ask us to do so or when you consent to that disclosure.

Where you are a customer, an employee, a contractor or supplier of services to one of our clients, then we may disclose your personal information as part of providing services to that client.

We do not disclose personal information to third parties for the purpose of allowing them to send marketing material to you. However, we may share non-personal, de-identified or aggregated information with select third parties for research, development, analytics or promotional purposes other than direct marketing.

1. **VISITING OUR WEBSITE AND ONLINE**

**Automatic collection of personal information**

Together with our service providers we use cookies and other technologies on our website and through email to automatically collect certain types of information. The collection of this information allows us to personalise your online experience (including tailoring our online presence) and enhancing your future online experience. We may also use this information for development and analytics purposes. You can tailor your experience with these technologies via the privacy and browser settings on your device or by rejecting the associated cookies.

**Analytics Tools**

We use analytics tools, such as Google Analytics. To provide website visitors with more choice on how their data is collected by Google Analytics, Google have developed the Google Analytics Opt-out Browser Add-on. More information about how we use Google Analytics can be found at <https://www.google.com/analytics/terms/us.html>.

**Social media widgets and applications**

Some of our websites and services may include functionality to enable information sharing via third party social media applications, such as the Facebook Like button and Twitter widget. These social media applications may collect and use information regarding your use of our websites. Any personal information that you provide via such social media applications may be collected and used by members of that social media application separate to us and are subject to the privacy policies of the relevant companies that provide the applications. We do not have control over, or responsibility for, those companies or their use of your information.

Any personal information that you provide on any of our social media feature may be shared with other users of that social media feature (unless otherwise stated at the point of collection), over whom we may have limited or no control.

1. **CHILDREN AND YOUNG PEOPLE**

We understand the importance of protecting the privacy of children and young people, especially in an online environment. In particular, our websites, products and services are not intentionally designed for, or directed at, children and young people under the age of 18.

It is our policy to never knowingly collect or maintain information about any person under the age of 18, except as part of a specific engagement to provide services which necessitates such personal information be collected or as otherwise required by law.

1. **ACCESS TO PERSONAL INFORMATION**

It’s important that you make sure the personal information we hold about you is accurate, up to date and complete. If any of your details change or if you believe that any personal information we have collected about you is inaccurate you can contact us and we will take reasonable steps to correct it in accordance with the requirements of the Privacy Act.

You can request access to your personal information that we hold about you. To make a request see [CONTACT](#_bookmark13) US for details. We may charge reasonable costs for providing you access to your personal information.

1. **COMPLAINTS**

You can notify us of any complaint you may have about our handling of your personal information. Following your initial contact, you will be asked to set out the details of your complaint in writing in a form provided.

We endeavor to reply within 28 working days of receipt of the completed complaint form and, where appropriate, will advise you of the general reasons for the outcome of the complaint.

While we hope that we will be able to resolve any complaints you may have without needing to involve third parties, if you are not satisfied with the outcome of your complaint, you can refer your complaint to the Office of the Australian Information Commissioner.

**CONTACT US**

If you have any questions in relation to this Privacy Policy

or the management of your personal information

you can contact us at via our website

**c2operations.com.au**

The information contained in this document is of a general nature and is not intended to address the objectives, financial situation or needs of any particular individual or entity. It is provided for information purposes only and does not constitute, nor should it be regarded in any manner whatsoever, as advice and is not intended to influence a person in making a decision, including, if applicable, in relation to any financial product or an interest in a financial product. Although we endeavor to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. No one should act on such information without appropriate professional advice after a thorough examination of the particular situation. To the extent permissible by law, C2 Operations Pty Ltd shall not be liable for any errors, omissions, defects or misrepresentations in the information or for any loss or damage suffered by persons who use or rely on such information (including for reasons of negligence, negligent misstatement or otherwise).

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