

Privacy Policy

Your Privacy is important to us

1. This Privacy Policy sets out how AJ Grant Building Pty Ltd ('AJG Australia') and related entities (AJG Australia, Publiq. Commercial, HomeCare Repair Australia, AJ Grant Restorations Division) uses and manages personal information provided to or collected by it.
2. AJG Australia is bound by the *Australian Privacy Principles* ('APP') contained in the *Privacy Act 1988 (Cth)*.
3. AJG Australia may, from time to time, review and update this Privacy Policy to take account of new laws and technology and changes to our operations and practices.
4. You do not have to provide AJG Australia with your personal information, including financial and other sensitive information. However, if you don't, it may affect AJG Australia's ability to assist you or provide you with the appropriate level of service you require.

What kind of personal information does AJG Australia collect?

5. The type of information AJG Australia collects and holds includes (but is not limited to) personal information, including financial and other sensitive information, about:
 - 5.1. Contact information of Policy Holder(s)/s or Client(s) such as full names, postal addresses, email addresses, residential and/or business addresses;
 - 5.2. Limited financial information of Policy Holder(s) or Client(s);
 - 5.3. Job specific financial arrangements and policy details of the Policy Holder(s) or Client(s);
 - 5.4. Details of an insurance claim made by the Policy Holder(s) or Client(s);
 - 5.5. Personal information provided by an insurer;
 - 5.6. Access information for job sites;
 - 5.7. Financial and taxation details of employees, contractors and sub-contractors;
 - 5.8. Personal contact details of employees, contractors and sub-contractors; and
 - 5.9. Competitive quotes and referrals.

Personal information you provide:

6. AJG Australia will generally collect personal information held about an individual or company by way of forms filled out both electronically and in written form by employees, policy holders, clients, contractors and sub-contractors or occasionally, the information may be given orally.

Personal information provided by insurers or third parties:

7. In some circumstances AJG Australia may be provided with personal information about an individual or Policy Holder(s) or Client(s) from an insurer or third party, for example a report provided by an assessor, auditor or specialist contractor/service provider.

Exception in relation to employee records:

8. The APP does not apply to an employee record. As a result, this Privacy Policy does not apply to the treatment of employee records by AJG Australia, where the treatment is directly related to a current or former employment relationship between AJG Australia and the employee or former employee.

How will AJG Australia use the personal information you provide?

9. AJG Australia uses the personal information it collects in the following areas from you for:

Policy Holder(s) or Client(s) and Insurers:

10. We collect, hold, use and disclose your personal information where it is reasonably necessary for, or directly related to, one or more of our functions or activities.
11. In relation to personal information of Policy Holder(s) or Client(s), AJG Australia's primary purpose of collection is to enable it to provide residential and/or commercial building services to the Policy Holder(s) or Client(s).
12. The purposes for which AJG Australia uses personal information of Policy Holder(s) or Client(s) include:
 - 12.1. day-to-day administration;
 - 12.2. management of job information in our job management system(s);
 - 12.3. site access and performance of services supplied to the Policy Holder(s) or Client(s)
 - 12.4. progress checks and payments for services provided; and
 - 12.5. to satisfy legal obligations AJG Australia may owe to an insurer or the Policy Holder(s) or Client(s).
13. Personal information about a Policy Holder(s) or Client(s) may be required, in order to arrange services or continue services.
14. If AJG Australia receives unsolicited personal information, it will determine if it could have collected the information and if the information is not of the type it could have collected will, if lawful, destroy the information except if contained in a Commonwealth record.

Job applicants, employees, contractors and sub-contractors:

15. In relation to personal information of job applicants, employees, contractors and sub-contractors, AJG Australia's primary purpose of collection is to assess and (if successful) to engage the applicant, employee, contractor or sub-contractor, as the case may be.
16. The purposes for which AJG Australia uses personal information of job applicants, employees, contractors and sub-contractors include:
 - 16.1. in administering the individual's employment or contract, as the case may be;
 - 16.2. for taxation and insurance purposes; and
 - 16.3. to satisfy the legal obligations of AJG Australia, for example, in relation to WHS.

Who might AJG Australia disclose personal information to?

17. AJ Grant Australia may disclose personal information, including sensitive information, held about an individual and/or Policy Holder(s) to:
 - 17.1. an insurer;
 - 17.2. government departments;
 - 17.3. medical practitioners;
 - 17.4. people providing services to AJG Australia including contractors and subcontractors;
 - 17.5. Law enforcement agencies where AJG Australia has reason to suspect unlawful activity or misconduct of a serious nature that relates to the business of AJG Australia;

- 17.6. after hours call centre;
- 17.7. financial and credit institutions including, but not limited to, credit card companies;
- 17.8. in order to prevent a serious threat to life, health or safety of an individual or public safety;
- 17.9. anyone you authorise AJG Australia to disclose information to; and
- 17.10. anyone to whom we are required to disclose the information to by Law

Management and security of personal information

- 18. AJG Australia respects the confidentiality of personal information and the privacy of individuals.
- 19. AJG Australia has procedures in place to protect the personal information it holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records.
- 20. People providing services to AJG Australia, including contractors and subcontractors agree not to disclose any personal information of Policy Holder(s), Client(s) or individuals provided by AJG Australia to them without first obtaining the written consent of AJG Australia.
- 21. All information collected by AJ Australia is stored in an appropriately secure format and held by AJG Australia for archival purposes. When the information is no longer required for the purposes for which it was collected it is deleted

How does AJG Australia deal with sensitive information?

- 22. 'Sensitive information' means: information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, philosophical beliefs, sexual orientation or practices or criminal record, that is also personal information; health information and biometric information about an individual.
- 23. Sensitive information will, unless you agree otherwise, be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose or where the use or disclosure of the sensitive information is allowed by Law.

Access and correction of personal information

- 24. Under the APP an individual has the right to obtain access to any personal information which AJG Australia holds about them and to advise AJG Australia of any perceived inaccuracy.
- 25. There are some exceptions to these rights set out in applicable legislation. You should refer to this legislation for further information on your rights.
- 26. To make a request to access or update any personal information please contact AJG Australia in writing. You may be required to verify your identity and will be required to specify what information or correction you require. AJG Australia may charge a fee to cover the cost of verifying your application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, AJG Australia will advise the likely cost in advance. If we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for the inability.

Sending information overseas:

- 27. AJ Grant Australia will not send personal information about an individual outside Australia without:
 - a) obtaining the consent of the individual (in some cases this consent will be implied); or

b) otherwise complying with the APP or other applicable privacy legislation.

28. AJG Australia may also store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia.

Enquiries and complaints:

29. If you would like further information about the way AJG Australia manages the personal information it holds or wish to complain if you believe that AJG Australia has breached the APP, please contact our office during normal office hours.

30. AJG Australia will investigate any complaint and will notify you of its decision in relation to your complaint as soon as practicable.