



BriefBox Pty Ltd ACN 163 710 174 Privacy Policy

1. Introduction and your agreement to this Privacy Policy

- 1.1 Welcome to www.BriefBox.com.au (**Website**). This Website is owned and operated by BriefBox Pty Ltd ACN 163 710 174 and its related companies (**BriefBox**). A full list of related companies is available on request.
- 1.2 BriefBox is committed to managing personal information in accordance with the Australian Privacy Principles under the *Privacy Act 1988* (Cth). **Personal Information** means information about an individual, or an individual who is reasonably identifiable.
- 1.3 This document sets out BriefBox's policies for managing Personal Information and is referred to as the **Privacy Policy**. In this Privacy Policy, "we" and "us" refers to BriefBox and "you" refers to any individual about whom we collect Personal Information.
- 1.4 This Privacy Policy is deemed to be incorporated into this Website's terms and conditions of use (**Terms of Use**) which are available on this Website.
- 1.5 By accessing or using this Website you are deemed to agree to the Terms of Use, including this Privacy Policy. If you do not agree to the Terms of Use or this Privacy Policy, you must immediately exit and not access or use this Website.
- 1.6 Capitalised terms used but not defined in this Privacy Policy have the meaning given to them in the Terms of Use.

2. Collection of Personal Information about Users

- 2.1 BriefBox collects Personal Information about Users in order to facilitate the operation of the Website and to enable Users to communicate and interact with each other.
- 2.2 Personal Information collected by BriefBox about Users generally includes: (i) User Registration Information provided by Users to BriefBox (such as a User's account details, email address, name, title, date of birth, address, country of residence, telephone number, employer/organisation name, office address, payment, bank account and financial institution details, credit card details, BPay details, telegraphic transfer details and billing address); and (ii) any information Users volunteer while using this Website including when populating a User profile and through suggestions and surveys.
- 2.3 Certain Personal Information which BriefBox collects may be considered "sensitive information" including information about User's racial or ethnic origin (such as languages spoken), membership of a professional or trade association or membership of a trade union. Providing sensitive information is completely voluntary and we will only collect sensitive information with your consent.
- 2.4 BriefBox will, where practicable, collect Personal Information about a User directly from the User and primarily via the Website. Depending on your account settings, other Users may provide Personal Information about you (such as endorsements and feedback). BriefBox may also collect Personal Information when Users interact with us by other means (such as by telephone or email).
- 2.5 The Website is intended to facilitate confidential communication and commercial interaction between purchasers and providers of professional services. For this reason, it is generally not practicable to provide Users with the option of not identifying themselves or using a pseudonym when using the Website and interacting with BriefBox.

- 2.6 If you do not provide any requested Personal Information to BriefBox, we may not be able to provide you with access to and use of this Website, the Website Material and the Services, or BriefBox's other products and services. If you have any concerns about Personal Information you have been asked to provide, please contact us using the details below.

3. Collection of Personal Information about non-Users

- 3.1 BriefBox may collect Personal Information about individuals who are not Users. This includes service providers and contractors to BriefBox; candidates for employment with BriefBox; and other individuals who interact with BriefBox on a commercial basis. BriefBox will generally collect this information directly from the individual concerned.
- 3.2 The kinds of Personal Information we collect will depend on the capacity in which you are dealing with us. Generally, it would include your name, contact details, professional details and information regarding our interactions and transactions with you.
- 3.3 BriefBox may also collect Personal Information about individuals who are not Users via the Website. This might occur, for example, if a User provides information about a colleague or team member. Before providing Personal Information to BriefBox about an individual who is not a User, a User must obtain that individual's consent to disclose information about them to BriefBox in accordance with this Privacy Policy.

4. Online and Digital Services

- 4.1 BriefBox will collect device identification information when you interact with us through the Website (such as device ID, device type, browser type and version). In some cases, these identifiers may only relate to a device or may be of an aggregated or statistical nature and will not identify you. In other cases, we may associate information about your use of the Website with your Personal Information.
- 4.2 BriefBox may place a "cookie" (a small text file) on any device you use to access this Website, which, among other things, assists BriefBox in providing you with an easy-to-use Website. Types of cookies that BriefBox may use includes strictly necessary cookies, performance cookies, functionality cookies, tailored content cookies and targeting cookies. When you revisit this Website, the cookie will enable BriefBox to recognise you as a previous User, remember your preferences, improve your browsing experience and ensure the content you see on the Website is more relevant to you and your interests and needs. You may configure your web browser to not accept cookies, although you may experience a loss of functionality as a result.

5. Workroom

- 5.1 The Workroom used and shared by Registered Users is private and confidential. Any information, including Personal Information, contained in the Workroom is not used by BriefBox, or any other person, for any purposes other than to facilitate communication and exchange information between the Registered Users involved.
- 5.2 We will not disclose information contained in the Workroom to any person except to comply with a legal obligation (such as a subpoena or court order).

6. Use of Personal Information

- 6.1 BriefBox may use your Personal Information to provide this Website, the Website Material and the Services to you; to communicate with you; and to manage relationships and Briefs between Registered Users.
- 6.2 We may also use your Personal Information for the administration of BriefBox's business including:

- 6.2.1 administering billing and debt recovery;
 - 6.2.2 testing and maintenance of the Website and information technology systems;
 - 6.2.3 product development and market research;
 - 6.2.4 managing, monitoring, planning and evaluating our Services;
 - 6.2.5 investigating, preventing or taking action regarding any breach or suspected breach of the Terms of Use or any law.
- 6.3 BriefBox may use your Personal Information for direct marketing, including to provide you with information about: (a) this Website, the Website Materials and the Services; (b) BriefBox's other products and services; (c) products and services available from our commercial partners and affiliates. You can opt out of direct marketing communications at any time [by changing your account settings] or by contacting us using the details below.
- 6.4 We may create anonymous data not linked or associated with your Personal Information by excluding from your Personal Information that can identify you or your employer/organisation or from automatically gathered information (**Anonymous Data**).
- 6.5 BriefBox may use Anonymous Data to analyse User patterns and User enquiries for any purpose including to enhance the Website and the Services.
- 7. Disclosure of Personal Information**
- 7.1 Personal Information which Users volunteer while using this Website (such as information in a User profile) will be visible to other Users. Users can control which Users and groups of Users can view their Personal Information by changing their account settings.
- 7.2 BriefBox may disclose (and you consent to BriefBox disclosing) your Personal Information to third parties for the purposes for which it is collected and for related purposes. This includes disclosing your Personal Information:
- 7.2.1 to BriefBox's external advisors, service providers, subcontractors and suppliers so that they can provide professional, financial, technical, administrative or other advice and services in connection with the operation of the Website and BriefBox's business;
 - 7.2.2 to any person who acquires or expresses an interest in acquiring all or any part of BriefBox's business (subject to that person giving BriefBox a legally binding confidentiality undertaking);
 - 7.2.3 to courts, law enforcement authorities and other persons as required or authorised by or under law (including in response to subpoenas, court orders, warrants and other legal authorities); and
 - 7.2.4 to other persons with your consent.
- 7.3 We may disclose your Personal Information to our commercial partners and affiliates for the purpose of those parties contacting you for direct marketing of their products and services. If you do not wish to receive direct marketing communications from our commercial partners and affiliates, you can opt out at any time by [changing your account settings] or by contacting us using the details below.
- 7.4 BriefBox may disclose Anonymous Data to third parties for analytical and commercial purposes including product development and market research. We may receive a fee or commission for disclosing Anonymous Data.

8. Disclosure of Personal Information overseas

- 8.1 BriefBox does not typically or routinely disclose your Personal Information to overseas recipients.
- 8.2 Unless we have your consent, or an exception under the Australian Privacy Principles applies, we will only disclose your Personal Information to overseas recipients where we have taken reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to your Personal Information.

9. Holding your Personal Information

- 9.1 BriefBox is an online business and primarily collects and holds your Personal Information in electronic form. Information held in electronic form is held securely on servers and computer systems located in reputable third-party data centres in Australia. Certain information is collected in paper-based documents (such as formal correspondence and legal documentation) which may be converted to electronic form and the original paper-based documents securely destroyed. Information which is retained in paper-based form is held securely at our premises or in facilities within our control in Australia.
- 9.2 We maintain physical security over our paper and electronic data stores, such as access controls and security systems at our premises and data centres. We also maintain computer and network security such as firewalls, data encryption and access controls (user identifiers and passwords) to control access to our computer systems.
- 9.3 BriefBox destroys or permanently de-identifies any Personal Information that is no longer needed for any of the purposes described above.

10. Access to and correction of your Personal Information

- 10.1 If you are a User, most Personal Information BriefBox holds about you is accessible via the Website and is able to be accessed and corrected via the ordinary functionality of the Website.
- 10.2 You may also request that BriefBox confirm whether it holds any Personal Information about you and, where applicable, request access to your Personal Information. BriefBox may require adequate proof of your identity before granting access to Personal Information and we may make access subject to payment of a reasonable administrative charge.
- 10.3 If you consider Personal Information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading, you may request that that we correct the information. If we are unable to agree about whether your Personal Information requires correction you may be entitled to request that BriefBox associate with your Personal Information a statement claiming that such Personal Information is inaccurate, out-of-date, incomplete, irrelevant or misleading.
- 10.4 BriefBox may decline your request to access or correct your Personal Information in certain circumstances in accordance with privacy laws (for example, if the request is frivolous or vexatious). We will provide you with reasons for declining your request and inform you of your right to make a complaint.

11. Complaints

- 11.1 You may contact BriefBox if you have any questions or concerns about this Privacy Policy or about the way in which your Personal Information has been handled.
- 11.2 You may make a complaint about privacy to the Privacy Officer using the contact details set out below. The Privacy Officer will first consider your complaint to determine whether there

are simple or immediate steps which can be taken to resolve the complaint. We will generally respond to your complaint within two weeks.

- 11.3 If your complaint requires more detailed consideration, we will acknowledge receipt of your complaint within two weeks and endeavour to respond to your complaint promptly. We may ask you to provide further information about your complaint and the outcome you are seeking.
- 11.4 In most cases, we will consider and respond to a complaint within 30 days. If the matter is complex and we require more time to consider and respond to your complaint, we will let you know.
- 11.5 If you are not satisfied with our response to your complaint, you are entitled to make a complaint to the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992. Full contact details for the Office of the Australian Information Commissioner can be found online www.oaic.gov.au.

12. Updating this Privacy Policy

BriefBox may change this Privacy Policy from time to time. Any changes to the Privacy Policy will be published on the Website.

13. Contacting BriefBox

BriefBox can be contacted at:

Email: privacy@briefbox.com.au

Address: Privacy Officer
Level 17, 40 Mount Street
North Sydney, NSW 2060, Australia

This Privacy Policy was last updated in March 2015.