



EECW Pty Ltd (ABN 82 064 781 568)

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Version: Version 1

PRIVACY POLICY

1. INTRODUCTION; APPLICATION OF PRIVACY LAWS

EECW Pty Ltd ("Encanta") respects privacy of individuals and understands its importance.

As a small business, we may be legally exempt from compliance with the Australian Privacy Principles and we have not formally "opted-in" to compliance with the Act. Nonetheless, we have adopted this Privacy Policy to inform you of our policies and procedures in the handling of "Personal Information".

Our aim is to give individuals confidence that we will take appropriate steps to protect the privacy of Personal Information that we collect.

The GDPR may apply in cases where we collect information about a citizen of the European Union. This Privacy Policy aims to comply both with the Act and the GDPR, where applicable.

Unless privacy laws entitle (or would entitle) us to do otherwise, we will normally be happy to provide further details of our treatment of your "Personal Information" - subject to our obligations of confidentiality, business and commercial sensitivities, the privacy of others, and the sensible restraints of security.

It is our objective to continuously improve our management of personal information and this policy may change over time.

2. DEFINITIONS OF SOME IMPORTANT EXPRESSIONS

In this Policy, the following words and expressions have the following respective meanings:

Act means the *Privacy Act 1988* (Cth)

Personal Information means information which identifies (or can reasonably be used to identify) an individual and includes "personal data" as defined in the GDPR.

Privacy Principle means an “Australian Privacy Principle”, as set out in the Act.

Encanta means EECW Pty Ltd (ABN 82 064 781 568), and references to “We” “Our” and “Us” and cognate expressions are references to Encanta.

GDPR means the European Union General Data Protection Regulation.

Sensitive Information includes Personal Information concerning (or that implies) an individual’s health status or illness, philosophical, religious or ethnic background, membership of a professional or trade association.

3. ACCOUNTABILITY, TRAINING AND INDUCTION

It is the responsibility of all Encanta staff to comply with privacy laws (where applicable) and this Policy. We will conduct periodic training in and obtain professional advice on the management of Personal Information for our staff. New staff will be inducted into this Policy on commencement of employment.

Where commercially and legally possible, reasonable and appropriate, we will request Our contractors to agree to comply with this policy and with the provisions of applicable privacy laws.

4. CONSENT

If we need the consent of an individual in relation to Personal Information, we will make reasonable endeavours to ensure that individuals can make an informed and voluntary decision. We understand that in many, but not all cases, consent may be withdrawn and wherever practicable, we will respect consent withdrawal.

5. WHAT PERSONAL INFORMATION DO WE NORMALLY COLLECT, HOW AND FOR WHAT PURPOSES?

The individuals from/about whom we collect information fall into the following main categories:

- individuals working within our clients and prospective clients;
- individuals who attend the conferences and other events that we manage for our clients;
- individuals working within corporate sponsors and exhibitors who support and participate in the conferences and events that we manage; and
- individuals working within businesses that supply of goods and services to us and our clients, including venues, the suppliers of accommodation and travel and tour providers.

What information do We collect?

We usually collect names, addresses, phone numbers and email details.

We may collect credit card information if that is the means by which an individual is to pay us or our client. If an individual is to pay for attendance or other participation in a conference/event, we may also collect that person's credit-card details, or other particulars, as may be necessary to process payments.

Payments made to us by credit card are subject to, and compliant with, Payment Card Industry ("PCI") security protocols and we do not retain or store credit card details. Where an individual submits credit card details to us to book accommodation, we will have access to those details until the date that is 14 days after the event.

We may also collect Sensitive Information in the following instances:

- health information, where that may be relevant to the delivery of goods and services to the individual in connection with the event, including:
 - the supply of food and beverage to individuals with special dietary needs, at events we manage;
 - access and egress to and from the event venue(s);
 - health risks to others;
- information concerning an individual's religious, ethnic or philosophical background or allegiance, where that is relevant to food and beverage supplied to them at events we manage, or to other aspects of those events. Here, we aim to ensure that the events we manage are culturally sensitive; and
- where we are managing a conference or other event for a trade or professional association, information pertaining to an individual's membership of the association is itself sensitive information as defined in the Act.

Purposes and use of collection of Personal Information

Generally, we collect Personal Information so that we can interact with the individual and/or their business, and, by doing so:

- provide professional conference and event management services for our client – the conference/event host; and
- provide appropriate goods and services to the individuals or the organisation they represent, while at the Event

We collect Personal Information for the purposes of managing our commercial relationship with our clients, suppliers, conference attendees and other participants, such as sponsors and exhibitors. This enables us to accept payments, allow admission to the conference or event and to manage the delivery of goods and services to the individuals during the conference/event.

In the case of sponsors and exhibitors, the collection of Personal Information enables us to manage the delivery of their entitlements and benefits at the event.

We also collect and retain the information so we can let individuals know of our services and any relevant news on our current and future events and activities that we reasonably consider may be of interest.

Where we collect Sensitive Information, it is usually so that we can ensure that culturally-sensitive or health-sensitive services, and goods including food and beverage, are provided to attendees of the events we manage.

Marketing

We may send individuals information about events hosted by our clients in which the individual may wish to participate.

You have the right at any time to stop us from contacting you for marketing purposes. If we do use Personal Information for the marketing of an event other than that for which the individual has registered to participate, we will ensure that communications we send will include an "opt-out" function. If an individual "opts-out" we will promptly remove that individual from our marketing database.

How do We collect Personal Information?

In the case of attendees at the conferences and events we manage, we usually collect Personal Information direct from attendees, from our client, or from an external supplier of conference registration services. Such Personal Information will usually be supplied to Us by electronic means, such as emails, or by attendees themselves when they submit on-line forms (contained in the event websites that we manage) to register their wish to attend, or to participate as a sponsor, exhibitor or speaker.

We may also collect your Personal Information from our client, the host of the relevant event that we are managing, if they provide us with contact information of:

- in cases where our client is an association, their members; and/or
- persons who have participated in previous events hosted by our client, whether as a delegate, sponsor, exhibitor or supplier of goods or services.

6. HOW DO WE HOLD THE PERSONAL INFORMATION WE COLLECT?

We hold the Personal Information we collect in a variety of ways, including on our electronic (computer) database and, in some cases also on file in hard copy.

We have adopted various security measures to protect this information from unauthorised access (see below).

7. OUR DISCLOSURE OF PERSONAL INFORMATION TO OTHERS

- (a) When we manage a conference or event for a client, we do so as agent for and on behalf of our client, the host of the event. Accordingly, we will usually provide Personal Information collected in the course of managing their conferences and events to our clients.
- (b) If an individual is attending a conference or event we are managing, we may disclose that person's Personal Information to sponsors of that event.
- (c) If we use externally provided and hosted software providers to manage registrations and/or data in connection with an event, the operator of that software may have access to Personal Information.
- (d) If we use externally provided or ghosted event "apps", your personal information may be disclosed to the operator of those "apps".
- (e) If the individual consents, we may publish Personal Information to the delegates attending the event.
- (f) In addition to the exceptions listed below, we will disclose Personal Information to third parties, as the individual would reasonably expect, in the provision of our services. Where it is necessary or desirable to ensure that an individual receives appropriate goods or services at an event, we will disclose relevant Personal Information (including, in some cases, Sensitive Information), to suppliers that we engage to provide those goods or services. Such third parties may include the venue of the event, function venues and restaurants and providers of accommodation, if the individual books it through us.

The circumstances will determine what information will be disclosed – but we will make reasonable endeavours to ensure that only the information that is reasonably necessary or desirable is disclosed.

Some suppliers may need an individual's Personal Information to provide appropriate goods or services. We may, for example, engage conference registration desk services, ushers and event "hosts", who may have access to Personal Information.

We may also engage third parties to assist with the development, maintenance or hosting of conference and event websites, and other information technology utilised at the conference or event.

Disclosure of credit card details

If an individual pays for accommodation via us, we will disclose your credit card details to the hotel or other supplier of accommodation and those details may be retained by those hotels and suppliers of accommodation as provided in their respective privacy policies and collection statements. They may retain your credit

card information in order to ensure full payment is made for room hire and other goods and services provided to you

Sensitive Information

In some cases, we may need to disclose Sensitive Information, where this is necessary to arrange the supply of culturally sensitive goods or services to the individual or for health reasons. For example, we may need to advise a venue, or food and beverage supplier, if the individual has special dietary requirements that may be based on religious or philosophical beliefs, or that arise because the individual has a particular food allergy.

Additional disclosure (in-house functions):

In addition to the suppliers we engage to supply goods and services for our clients' conferences and events, we may from time to time outsource management of certain "in-house" functions, including but not limited to:

- development, management, maintenance and/or hosting of our own website and databases;
- marketing and mail-outs;
- book-keeping and accounting; and/or
- cleaning.

In such cases the external service provider may have access to Personal Information that we have collected. In such cases it is our policy to seek to include, where commercially possible and appropriate, provisions in the contract that oblige the service provider to observe the confidentiality of Personal Information, to comply with our privacy policy and, applicable privacy laws.

We may also disclose Personal Information to our professional advisers, such as our lawyers and accountants in any case where we need to seek advice.

Apart from disclosure to third parties as noted above, we will not otherwise disclose an individual's Personal Information to other third parties unless:

- we have the individual's consent;
- making the disclosure is related to the primary purpose for which we have collected the information and we deem that the individual would reasonably have expected us to make the disclosure;
- we are required to do so by law, in which case we would inform the individual, unless doing so itself is unlawful or would impede or defeat the purpose of the disclosure; or
- we are required to hand over our management of a conference or event to our client or to another professional conference organiser or event manager;

- we are selling or negotiating a sale of Our business, or a substantial portion of it, in which case we will disclose the information only if the other party with whom we are negotiating agrees to refrain from use of the information until it completes the purchase.

We will never sell an individual's Personal Information unless we have the individual's express consent; or the sale is part of a sale of our business or a part of our business, as noted above.

8. OVERSEAS DISCLOSURE

In some instances, we may be dealing with a client or providing services in respect of an event taking place overseas. If we need to disclose Personal Information to any person overseas, we will not do so unless:

- we are satisfied that privacy laws in the overseas country provide similar protection for the privacy of the individual as applies in Australia under the Act; or
- we obtain the consent of the individual.

9. ON-LINE PRIVACY AND COOKIES

We will not use your access/use of our website or an event website to ascertain information about you, other than that which you voluntarily submit to us when you register for participation in an event.

Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. When you visit our website or an event website, we may collect information from you automatically through cookies or similar technology. For further information, visit:

<https://www.allaboutcookies.org/>

How do we use cookies?

Our Company uses cookies in a range of ways to improve your experience on our website, including to keep you signed in and to enable us to understand how you use our website.

Cookies will never be used to identify you personally. We do not store cookies in any manner in connection with Personal Information identifying you.

What types of cookies do we use?

There are a number of different types of cookies, however, our websites use navigational and functionality cookies only. These allow us and the website to "recognize" you and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.

How to manage cookies

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in some cases, some of our website features may not function as a result.

Privacy policies of other websites

If our website, or an event website contains links to other websites, the privacy policy of the operator of that website applies. Our privacy policy and collection statements apply only to our website and the event websites we manage, so if you click on a link to another website, you should read their privacy policy.

10. SECURITY OF PERSONAL INFORMATION

It is not appropriate in this Policy to provide specific details of security measures we have adopted to protect the privacy of Personal information we hold. To do so could compromise those security measures.

We will use an appropriate combination of:

- physical barriers including locked doors;
- alarm systems;
- access technology, password systems and encryption where appropriate; and
- administrative and behavioural protocols for our staff,

to exclude unauthorised persons or intruders from gaining access to the Personal Information we hold.

We have acquired and will continue to acquire and maintain (reasonably within Our means) computer technology and other appropriate technology, such as password security protocols and "fire-walls" to prevent or retard unauthorised access into Our computer system.

Please note, however, that no security system is 100% secure – so we cannot promise or warrant that unauthorised access will never occur.

11. ACCESS AND CORRECTION RIGHTS

We will provide individuals access to the Personal Information which we hold about them, unless the Act (if it applied to us) would allow us to deny access to some or all of the Personal Information concerned, or to provide an explanation for a decision instead.

Some circumstances where the Act (if it applied to us) would allow us to deny access are where:

- providing access would unreasonably be to the detriment of the privacy of another individual;
- the request is frivolous or vexatious;
- the requested information relates to existing or anticipated legal proceedings between us and the individual;
- giving access would reveal our intentions in relation to negotiations with the individual and prejudice those negotiations; or
- providing access would be unlawful or if denying access is required or authorised under law.

This is not an exhaustive list of circumstances where we may reserve the right to deny access.

When an individual requests access to Personal Information, we will require a written request, to be sent to us at the address noted below.

We will acknowledge the access request within 14 days and deal with it within 30 days or earlier. Though we may ask, we will not *require* an explanation of *why* the request has been made as a pre-requisite to giving access. We will not charge a fee for access.

If we determine to deny access to the whole or part of Personal Information requested, we may provide a short explanation, but we will not provide details of Our reasoning.

12. GDPR rights

If the GDPR applies, we will usually be a "data processor" for its purposes.

If the GDPR applies, you have the following additional rights under the GDPR,

- **The right to access** – You have the right to request us to provide copies of your Personal Information. We may charge you a small fee for this service.
- **The right to rectification**– You have the right to request us to correct any information you believe is inaccurate. You also have the right to request us to complete information you believe is incomplete.
- **The right to erasure** – You have the right to request us to erase your Personal Information, under certain conditions.
- **The right to restrict processing** – You have the right to request that we restrict the processing of your Personal Information, under certain conditions.
- **The right to object to processing** – You have the right to object to our processing of your Personal Information, under certain conditions.

- **The right to data portability** – You have the right to request that we transfer the Personal Information that we have collected to another organisation, or directly to you, under certain conditions.

If you make a request under the GDPR, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email:

13. USE OF GOVERNMENT IDENTIFIERS

We will not use government identifiers such as tax file numbers or Medicare numbers as a means of identifying an individual.

14. ANONYMITY

Given the personal nature of Our services, it is not normally appropriate for individuals to remain anonymous in their dealings with us. If we conduct a survey, while we may ask for it, usually we will not require Personal information that will identify the individual.

15. CONTACTING US AND COMPLAINTS

If an individual:

- has an enquiry about our management of Personal Information or privacy procedures;
- wishes to request access to Personal Information;
- wishes to see a copy of this Policy document; or
- wishes to make a complaint about our handling of Personal Information that person can contact us by the following means:

Phone: From outside Australia: 61-8 9389 1488;

From within Australia: (08) 9389 1488

Email: renee.bennett@encanta.com.au

Postal Address: The Privacy and Data Protection Officer, Encanta Event Management, Suite 6, 884 Beaufort St Inglewood, Western Australia 6052

14. COMPLAINTS

Complaints about privacy must be made in writing. This will allow us to deal with complaints in a professional, sensitive and consistent manner.

We will acknowledge receipt of a request within 14 days of receiving it and We will respond within 30 days of receipt. We will also do our best to deal with the complaint within that time, assuming that we are able to investigate and ascertain

the necessary facts, and take the necessary action, if any, within that time. We will let the individual know if it is likely to take substantially longer.

Complainants will be given an opportunity to put their complaint in writing, to propose a remedy for the complaint and to discuss the matter with us.

We will determine, in the case of each complaint (if any), what is to be done, if anything, to redress the complaint.

Also, we will assess whether the complaint demonstrates a systemic problem and will make a determination as to how we can address/rectify such issues so they do not recur.

Renee Bennett

Managing Director,

EECW Pty Ltd
