



# Comprehensive Privacy Policy

## Introduction

Xponential Group Pty Ltd (“Xponential” or “we”) is committed to protecting the privacy of personal information. We maintain a safe and secure system of handling that information and to give access to personal information when required. We ensure that personal information is handled in strict compliance with the requirements under the Australian Privacy Act 1988 (Cth). Xponential chooses to comply with the Australian Privacy Principles. We use personal information for three primary purposes:

- To enable quick and convenient contact with specific individuals who require follow-up services from us after contacting us.
- To create a record of personal information that can be utilised in the future within our marketing and customer service departments, should the need for contact again be necessary.
- To provide our fundraising consultancy services to charities or not for profit organisations (“clients”).

## Anonymity

By not providing the personal information as requested, you will still be able to have access to the Xponential website, but we will not be able to process certain requests that require further communication, such as orders, enquiries and such like. All requests for removal from such future contact are always honoured.

Our fundraising consultancy services cannot be conducted with anonymity.

## Personal information that we collect and hold.

If you use our website or communicate with our staff, Xponential may ask you to provide information that personally identifies you in certain circumstances, including for example when submitting an enquiry or order.

When Xponential provides fundraising consultancy services to clients it may collect and hold information from the public domain about individuals. This information may typically include publicly available information on wealth, charitable donations and interests, board and committee roles. This information may be collected from published web and media sources, publicly available government registers and listed company information. Xponential also receives information about individuals from clients when the client has collected and holds the information in accordance with the Australian Privacy Principles.

Xponential does not collect or hold sensitive information.

### **Unsolicited Personal Information**

Xponential does not receive unsolicited personal information.

### **Purposes for which we collect, hold, use and disclose personal information**

We collect, hold, use and disclose personal information only for the three purposes stated in the Introduction.

Xponential never provides any personal information which you provide to us directly to any third-party for commercial or other purposes, unless required to do so by law. This is a strict policy that is strictly enforced. Xponential does not deal in personal information.

### **Security and quality of personal information.**

We store personal information on secure, password-protected computers or cloud-based data storage services.

We periodically audit and monitor staff compliance with this Privacy Policy, and we limit internal staff access to that personal information which is necessary for those staff to provide our consultancy services to the specific clients.

We will take all reasonable steps to make sure that the personal information we collect, use or disclose is accurate, complete and up to date; and to destroy or permanently de-identify the information if it is no longer needed for any purpose.

### **How an individual may access their personal information and seek correction of it.**

Individuals have a right to request access to personal information we hold about them and to request personal information to be corrected. All requests should be directed to Brian Holmes, Managing Director, Xponential Group, 03 9328 2849 Suite10A, 79 Chetwynd Street, North Melbourne VIC 3051 or success 'at' xponential.com.au ("at" is spelt to reduce inbound spam email)

If you wish to complain if Xponential or a contractor breaches the Australian Privacy Principles, the complaint must be made directly to Xponential first, that the complaint may then be taken to a recognised external dispute resolution scheme (if applicable), and lastly, that the complaint may be taken to the OAIC.

### **Overseas Disclosure**

Xponential may disclose personal information overseas for purposes of data analysis or charitable interests research. Such disclosure is only made for purposes requested by clients. This information generally includes only an individual's name, and (in the case of data analysis) the date and amount of donations to a client. Wherever feasible, we conduct analysis using data in de-identified form.

Xponential enters enforceable contracts with any overseas recipient of information that requires the recipient to handle the personal information in accordance with this Privacy Policy and the Australian Privacy Principles.