

# PRIVACY POLICY

**Pollock Ingram Holdings Pty Ltd A.C.N. 672 607 484 trading as Pollock Ingram Solicitors**  
2 First Avenue, Caloundra QLD 4551

## 1. Introduction

- 1.1 Pollock Ingram Holdings Pty Ltd ("we", "us", "our") is committed to protecting your privacy and handling your personal information in accordance with the Australian Privacy Principles (APPs) under the *Privacy Act 1988 (Cth)* and the Information Privacy Principles (IPPs) under the *Information Privacy Act 2009 QLD (IP Act)*.
- 1.2 This policy outlines how we collect, use, disclose, store, and protect your personal information.
- 1.3 Our Privacy Policy may be revised periodically to accommodate changes in our procedures or to comply with legal obligations. The most up-to-date version will always be accessible on our website at [www.pollockingham.com](http://www.pollockingham.com)
- 1.4 When delivering designated services, we may need to confirm your identity and gather specific information as required by the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) (AML/CTF Act). Identity verification documents may also be necessary for other services, including court proceedings, property transactions, and asset management. This process involves obtaining identification documents as well as details regarding the origin of funds and the beneficial ownership of entities.

## 2. Definitions

- a. 'Personal information' refers to any data or opinion relating to a person who can be identified, or is reasonably capable of being identified, whether or not the information is documented.
- b. 'Sensitive information' is a specific category of personal information and covers details or views about an individual's racial or ethnic background, political beliefs, religious or philosophical affiliations, membership in political, professional or trade organisations or unions, sexual preferences or activities, criminal history, health or genetic details, as well as biometric templates and biometric data used for identification or verification purposes.

## 3. What Personal Information Do We Collect?

We may collect personal information including, but not limited to:

- Names, addresses, phone numbers, and email addresses
- Date of birth, gender, and identification details
- Billing and financial information (such as bank account and payment card details)
- job title, employer, qualifications, work history
- Information relevant to your legal matter

- Information about your relationship with us, our clients and others (such as other persons and organisation involved in a legal matter, and our community partners)
- Any other information required for us to provide our legal services
- Personal and sensitive information may be provided to us through various forms of communication, such as in person, by email, over the phone, through web forms, or via virtual meetings.

If you are involved in, or have an association with, a matter for which we have been retained, we may also gather additional personal and sensitive information about you that is pertinent to the matter as part of delivering our legal services. The exact nature of the information collected will vary depending on the specifics of the matter and your relationship to it.

#### **4. How Do We Collect Your Personal Information?**

We collect personal information directly from you when you:

- Engage us to provide legal services
- Communicate with us by phone, email, or in person
- Complete forms or provide documents to us

We may also collect information from third parties where necessary (e.g., government agencies, courts, or other parties involved in your matter, or your employer, an organisation you work with or a third party acting on your behalf (such as your legal representative, attorney, dealer, broker or financial advisor) or publicly available sources, such as online registers or the internet.

If you share another person's personal information with us, please ensure they are made aware of this privacy policy. You should only provide us with someone else's sensitive information if you have their consent, or if the disclosure is otherwise allowed under the Privacy Act.

Clients may request to interact with us anonymously or by using a pseudonym. However, in most situations, this will not be lawful or feasible. If you choose not to provide the personal information we request, we may be unable to offer our legal services or respond to your enquiry.

#### **5. Why Do We Collect, Hold, Use and Disclose Your Personal Information?**

We collect, hold, use and disclose your personal information for purposes including:

- Providing legal services and advice to you
- Communicating with you about your matter
- Managing our business operations (including billing and administration)
- Complying with our legal and regulatory obligations under both the Commonwealth and Queensland privacy laws
- Improving our services
- Register your interest in, or apply for, a job with us

- Developing and sustaining relationships with you, as well as with our existing and potential clients, community partners, service providers, and business associates.
- Supplying you with updates, insights, and other relevant information (such as invitations to events) that align with your interests, business activities, or professional expertise.
- Putting forward nominations for you and our clients for external awards and recognition, and requesting your feedback on our services, including through participation in market research surveys.

If you prefer not to receive marketing communications from us, you can unsubscribe or opt out at any time by clicking the unsubscribe link in our marketing emails or by reaching out to our Privacy Officer using the contact details provided in the Contact Us section.

If you do not provide us with the personal information we request, we may not be able to provide our services to you.

## **6. Disclosure of Personal Information**

We may disclose your personal information to:

- Our employees and contractors
- Barristers, experts, and other professionals engaged in your matter
- Courts, tribunals, regulatory authorities, or law enforcement as required by law
- Third-party service providers (such as IT support, document storage providers)
- Other parties with your consent or as required by law

Some of these third parties may be located outside Australia. Where this occurs, we will take reasonable steps to ensure that your information is handled in accordance with the APPs and IPPs.

## **7. Employment**

If you express interest in, or apply for, a position with us (including work placements or clerkships), we will collect certain personal information as part of the recruitment process.

The types of information we typically gather include:

- Your contact information, such as your name, address, email address, and phone number
- Details about your education, work experience, and qualifications
- Evidence confirming your right to work in Australia
- Contact information for your referees
- Results from police or background checks, including any relevant information about criminal convictions, where required
- Any additional personal details you provide throughout the recruitment process (including during interviews), which may also include sensitive information

## **8. Security of Your Personal Information**

We store your personal information in a system intended to safeguard against data breaches. However, as with any security measures, risks can be reduced but not entirely removed. Our standard practice is to engage reputable storage service providers and request assurances from them about the security and confidentiality of your information. We also store your information in a storage facility that is locked and only accessed by staff. We hold your personal information in safe custody when instructed to do so.

In the event of a data breach, we advise you and follow obligations under the Notifiable Data Breaches (NDB) Scheme. We have a spreadsheet that notes any data breaches and actions taken.

## **9. Retention and Destruction**

We keep personal information for as long as it is needed to achieve the purposes for which it was collected, to meet our legal and professional responsibilities, and to ensure relevant evidence is accessible if reasonably required.

## **10. Access to and Correction of Your Personal Information**

You have the right to request access to the personal information we hold about you and to request its correction if it is inaccurate or out-of-date. Please contact us using the details below.

## **11. Complaints**

If you believe that we have breached your privacy or our obligations under the *Privacy Act 1988 (Cth)* or the *Information Privacy Act 2009 (QLD)*, please contact our Privacy Officer using the details below. We will investigate your complaint and respond as soon as practicable.

If you are not satisfied with our response, you may refer your complaint to the Office of Australian Information Commissioner (OAIC) or the Office of the Information Commissioner Queensland (OIC Qld).

## **12. Overseas Disclosure**

If your personal information is disclosed to an overseas recipient, we will take reasonable steps to ensure that the recipient does not breach the APPs or IPPs in relation to your information. However, if you consent to such disclosure, we may not be able to guarantee that overseas recipients will comply with Australian or Queensland privacy laws.

## **13. Contact Us**

For any questions about this policy or to make a complaint or request regarding your personal information, please contact:

### **Privacy Officer/s**

Alison English or Rebecca Supple  
Pollock Ingram Holdings Pty Ltd A.C.N. 672 607 484  
2 First Avenue  
Caloundra QLD 4551  
Phone: 07 5491 1444  
Email: [office@pollockingham.com](mailto:office@pollockingham.com)