

Working for ALL LARRAKIA

Larrakia Development Corporation ACN: 099 471 495

The Trustee for the Larrakia Development Trust ABN: 86 752 337 898

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LDC PRIVACY POLICY

Purpose and Scope

The Privacy Policy implemented by Larrakia Development Corporation extends to and covers all operations and function of the organisation. All directors, management, employees, contractors, sub-contractors, vendors, service providers, customers, agents or any other third parties that have access to and/or utilise personal information collected and/or held by Larrakia Development Corporation must abide by this Privacy Policy.

The objective of the Privacy Policy is to ensure that a sound privacy foundation and framework is established and maintained by Larrakia Development Corporation and the company complies with the relevant Privacy legislation – Privacy Amendment (Enhancing Privacy Protection) Act 2012 (C'th), Privacy Regulations 2013 (C'th), Privacy and Personal Information Protection Act 2002 (NT) and others.

Further Privacy training is covered in Larrakia Development Corporation's **Induction Training Program** that all employees complete as part of induction.

Ownership of Personal Information

All personal information collected, held or shared by Larrakia Development Corporation must be done so in accordance with this Privacy Policy. Larrakia Development Corporation retains the right to take reasonable steps to ensure that its Privacy Policy is properly adhered to.

In every department or function of Larrakia Development Corporation where personal information is collected, the person to whom the information is given or the application is addressed is responsible for ensuring compliance with this Privacy Policy.

It is the responsibility of all employees and other relevant parties to ensure that they understand and adhere to the Privacy Policy implemented by Larrakia Development Corporation and that they maintain up-to-date knowledge of changes or any new privacy policies and procedures.

| VERSION | DATE | APPROVED BY | SIGNED |
|---------|----------|--------------|--------|
| 1.0 | 6/8/2020 | NIGEL BROWNE | - W |



Ignorance of the existence of any privacy policies and procedures will not be an acceptable excuse for non-compliance.

Contractual Arrangements

Larrakia Development Corporation will ensure that all contractual arrangements with third parties adequately address privacy issues.

Availability of Privacy Policy

Larrakia Development Corporation will ensure that a copy of the Privacy Policy is available to all job applicants and customers if requested. The Privacy Policy is available on the company website.

Collection of Information

Collection of personal information by Larrakia Development Corporation will be reasonable, lawful and not intrusive. A person from whom personal information is requested must be told:

- the company's name (if external to the company);
- the purpose of collection;
- that they can get access to their personal information in order to check its accuracy;
 and
- what will be done with the information.

Use and Disclosure

Larrakia Development Corporation will only use or disclose information for the purpose for which it was collected unless the person has consented, or the secondary purpose is related to the primary purpose and a person would reasonably expect such use or disclosure, or the use is for direct marketing in specified circumstances and with the permission of the person, or in circumstances related to public interest such as law enforcement and public or individual health and safety.

Data Security

Larrakia Development Corporation will take all reasonable steps to protect the personal information it holds from misuse and loss and from unauthorised access, modification or disclosure.

Access to Personal Information

Any person who has provided personal information to Larrakia Development Corporation for whatever reason may gain access to that information by contacting the LDC Business Manager.



Complaints Procedure

Any complaints or requests for information regarding privacy must be handled in accordance with the following procedure:

- **Contact the Privacy Officer** The incumbent of the position LDC Business Manager will handle any complaints and explain the procedure involved.
- **Confidentiality** Any complaint will be dealt with in the strictest of confidence.
- Outside Assistance Whilst the company will make every effort to resolve any complaint within the organisation, any person who feels their privacy has been breached has the right to take the complaint to the Privacy Commission.