



## Privacy Policy

### 1. INTRODUCTION

- a. This Privacy Policy pertains to the gathering, safekeeping, utilisation, and disclosure of personal information carried out by Gurugun Pty Ltd (referred to as "Gurugun").
- b. Gurugun places significant emphasis on maintaining privacy within its operations to safeguard the personal information of its employees, clients, and the general public. Since its establishment, Gurugun has cultivated a culture that upholds stringent privacy practices and implements systems to manage personal information in compliance with the *Privacy Act 1998* (Cth) (referred to as "the Act").
- c. By engaging with any of our services, visiting our website ([www.gurugun.au](http://www.gurugun.au)), or providing us with your personal information, you acknowledge and consent to the collection, storage, utilisation, and disclosure of your information as outlined in this Privacy Policy.

### 2. PERSONAL INFORMATION

- a. Under the Act, personal information means information, or an opinion, that could identify an individual.
- b. This includes information such as your name, date of birth, contact details, and signature.

### 3. SENSITIVE INFORMATION

- a. Sensitive information is a subset of personal information and consists of information or opinions about your racial or ethnic origin, political opinions or associations, religious or philosophical beliefs, sexual orientation, health or criminal record. For the full list, please see refer to the [Act](#).
- b. We only collect, use or disclose sensitive information about you if you have provided us with consent or if the law permits us to do so without consent.

### 4. PERSONAL INFORMATION WE COLLECT & WHAT WE DO WITH IT

- a. This table explains the types of personal information we collect, and the purposes for which we use and disclose it.



For these people...	We collect this information personal about them...	And use and disclose it for...
people who work for our client organisations	<p>Name, business address, title, organisation and contact information, interest in our services and events</p> <p>Information about client relationships or meetings</p> <p>The client usually provides this information to us at the commencement of a business relationship. However, we may collect information about client personnel from other public or non-public sources.</p>	providing services to our clients, business development and marketing
people who work for our prospective client organisations		
people who attend our events		business development and marketing
people who subscribe to our electronic communications		
people who work for our business partner and supplier organisations	Name, business address, title, organisation and contact information	building and managing our commercial relationships with our partners and suppliers
individual suppliers		
prospective employees	<p>Information provided by the person (e.g. a job application, including a referee report), on behalf of the person (e.g. by a recruitment agency) information provided by other people, e.g. current Gurugun employees</p> <p>Written or oral referee reports</p>	selecting people who would be right to join our team
referees for prospective employees		
current and past employees	Personnel records information indicating current or former security clearance, criminal history checks or other checks required by our clients, and the high-level results (i.e. a security clearance granted, or a clear criminal history check)	managing the employment relationship
people who browse our website	see Using our Website section below	
people who participate in	Name, title, organisation, contact information; information you provide when you answer questions including testing using	provide our profiling, training, consulting, selection or



Hogans assessment processes	standard measures of an individual's psychological tendencies or abilities; feedback from others about your performance; reports generated from yours and others' responses about you	development services to our client organisations that you may be a part of
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*Table 1: Collection and Use*

## 5. USING OUR WEBSITE ([www.gurugun.au](http://www.gurugun.au))

- a. When you visit our website, we receive information from your browser as well as information that you knowingly and voluntarily submit. In order to enhance your experience on our website, we may utilise "cookies." These are small text files that our site may place on your computer to remember your preferences. You have the option to decline the use of cookies by adjusting the settings on your browser.
- b. When you use our website, we collect and utilise the following types of personal information:
  - i. Information regarding your usage of the website, including the pages you visit and the duration of your stay on those pages.
  - ii. Information regarding your usage of the website, including the pages you visit and the duration of your stay on those pages.
  - iii. Information pertaining to transactions conducted on the website.
- c. We may use your personal information to:
  - i. • Administer the website.
  - ii. • Respond to your enquiry.
  - iii. • Personalise the website according to your preferences, or
  - iv. • Publish information about you on the website.
- d. It is important to note that our website may contain links to other websites that are beyond our control. If you choose to follow such links, it is advisable to familiarise yourself with the privacy practices of those respective websites.
- e. Our website uses interfaces with LinkedIn. If you choose to 'like' or 'share' information from our website through LinkedIn, we recommend reviewing the [privacy policy of LinkedIn](#) for further information.



## **6. DATA SECURITY**

- a. Gurugun maintains comprehensive processes for information and data protection, prioritising confidentiality and privacy. To uphold the highest standards of information security, all Gurugun employees and contractors are obligated to adhere to strict guidelines regarding the secure handling of all information. This includes the strict confidentiality of client confidential information, in accordance with each client's specific requirements.
- b. In cases where service providers are involved, they are contractually obligated to securely store any personal or sensitive information. These contractual arrangements ensure the security and confidentiality of the data, in alignment with Gurugun's cyber policy and the requirements of Defence Industry Security Partners.

## **7. OVERSEAS DISCLOSURE**

- a. The majority of our systems are hosted and have data stored in Australia. We store some information on servers located in the United States and stored in accordance ISO/IEC 27001 information security management systems.

## **8. ARCHIVING AND DOCUMENT DESTRUCTION**

- a. Where we no longer require your personal information, including where we are no longer required by law to keep records relating to you, we will ensure that it is de-identified or destroyed.
- b. Gurugun does not retain personal information in hard copy. Hard copy material is used for temporary purposes only. All hard copy material, even if not confidential, is securely disposed of through our secure document destruction process.

## **9. CORRECTION OF INFORMATION**

- a. We make every effort to ensure that the personal information we hold is accurate, complete, relevant, and appropriate for the purposes of disclosure. If we become aware that any information is incorrect, misleading, or outdated, we will take reasonable steps to rectify it. Additionally, if you notify us of any inaccuracies and it is reasonable and practicable for us to do so, we will notify relevant third parties about the corrected information.
- b. If you wish to request a change in your personal information, you can contact us using the details provided below. However, please note that we are not obligated to modify the information if it is found to be correct. If we disagree with the changes you have requested, we will provide you with a written explanation, unless the law permits us to not specify a reason. You may also request that we include a statement from you regarding the disputed information.



## 10. ACCESS TO YOUR PERSONAL INFORMATION

- a. If you would like to request access to the personal information we hold about you, you may do so by using the contact details provided below. We are committed to facilitating your access to your personal information.
- b. In the event that we are unable to fulfill your request for access and decide to refuse it, we will provide you with a written explanation (unless the law allows us to not specify a reason). Moreover, we will provide information on how you can lodge a complaint regarding our refusal, ensuring transparency and recourse for you.

## 11. MARKETING

- a. Periodically, we engage in marketing activities by sending out communications via email, postal mailouts, or SMS text messages. Gurugun strictly adheres to the regulations set forth in the Spam Act 2003 (Cth) to ensure compliance with electronic marketing communications. Our commitment is to prevent recipients from receiving excessive volumes of unnecessary unsolicited communications and to provide them with the option to unsubscribe if desired.

## 12. ENQUIRIES & COMPLAINTS

- a. If you have any concerns, enquiries or complaints about this Privacy Policy or with how we obtain or store your personal information or compliance with the Act or any other related codes, you are welcome to contact us:

Phone: 1800 (487 848) GURUGUN

Email: [hello@gurugun.au](mailto:hello@gurugun.au)

Write: Gurugun Pty Ltd

14/4 Wormald St

SYMONSTON ACT 2609

## 13. CHANGES TO THIS POLICY

- a. We may change this policy from time to time. The current policy is on our website: [www.gurugun.au](http://www.gurugun.au).

## 14. EFFECTIVE DATE OF THIS POLICY

- a. 12 June 2023