

MCI Australia Pty Ltd

ABN 76 108 781 988

PRIVACY POLICY

1. INTRODUCTION

MCI understands that privacy is an important issue for individuals. MCI believes that due respect for individual privacy not only protects an important personal right but is a powerful tool in the creation of healthy relationships with the individuals with whom we deal.

This policy statement outlines the policy of MCI on the privacy of personal information and our compliance with the Australian Privacy Principles contained in the *Privacy Act, 1988 (Cth)*. For convenience in this policy the aforementioned principles are referred to as "Privacy Principles" or the "APPs".

In any particular case we will be happy to provide further detail of our treatment of personal information, subject to our obligations of confidentiality, and the sensible restraints of security.

Also, we aim to get better at privacy matters. This policy may change over time.

2. ACCOUNTABILITY

It is the responsibility of all MCI staff to comply with privacy laws and this policy. We conduct periodic training in the management of personal information for our staff.

MCI will, wherever commercially and legally possible and appropriate, require contractors to be *contractually bound* to comply with this policy and with the provisions of the *Privacy Act*.

MCI will regard non-compliance with this policy seriously. Violation of this policy may lead to disciplinary procedures being imposed, up to and including the possibility of dismissal.

Staff of MCI must report breaches of this policy to the Privacy Officer if they become aware of them. Breach of this policy will include:

- non-compliance with the terms of this document and privacy procedures we implement;
- gaining or attempting to gain *unauthorised* or inappropriate access to personal information held by MCI; and
- unauthorised disclosure or use of personal information held by MCI, to third parties.

3. CONSENT AND OUR APPROACH TO IT

In some cases it is our policy to obtain consent before collecting or using personal information. In such cases we will not put undue pressure on an individual to give consent. We will endeavour to ensure that individuals can make an informed decision and that they are not under duress.

4. WHAT KINDS OF PERSONAL INFORMATION DO WE NORMALLY COLLECT? HOW AND FOR WHAT PURPOSES DO WE COLLECT IT?

The kinds of personal information we collect, the way we collect it and our purpose of doing so depends on the individual from whom we collect it and the nature of our interaction with that person. Broadly, the individuals we collect information from can be grouped into the following main categories:

- clients or staff of clients who may be acquiring or proposing to acquire our services;
- attendees of the conferences and other events that we manage for our clients; and
- suppliers of goods and services to MCI and its clients.

What information do we collect?

To do its job, MCI needs to collect information about individuals – mostly to enable us to contact the individual and to manage our commercial and legal relationships.

We routinely collect names, addresses, phone numbers and email details for contact and identification purposes.

Less commonly, we also collect some "sensitive" information, so that we can provide culturally sensitive and appropriate services such as the ethnic and religious identity of an attendee – so that, for example, we can arrange for appropriate food and beverage to be supplied to that person at a function.

In the case of suppliers and other business contacts we collect only that personal information (such as names, addresses, contact details and job titles) that we need to manage our contracts and commercial relationships with those suppliers.

Purpose of collection of personal information

We collect personal information for the purposes of providing our services and to enable us to manage our commercial relationship with our clients and suppliers. We also collect and retain the information so we can let individuals know of our services and any relevant news on our events and activities.

How do we collect personal information?

We collect personal information usually from the individual direct.

In the case of attendees at the conferences and events we manage, we also collect personal information from our client or from an external supplier of registration services. We will do this in face-to-face meetings and the information provided to us is supplemented by phone, email and postal communications.

We will collect the information we need from suppliers themselves in a variety of ways – face-to-face, phone, email and fax.

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

We hold personal information we collect in a variety of ways, including on our electronic (computer) database and on file in hard or soft copy. MCI has adopted various security measures to protect this information from unauthorised access (see below).

6. WILL WE DISCLOSE PERSONAL INFORMATION TO OTHERS?

Clients and conference/event attendees - We will disclose personal information to third parties only as our clients and the attendees of their events would reasonably expect in the provision of our services – for example, to suppliers that we engage to provide goods and services in respect of the conference/event.

The circumstances will determine what information will be disclosed – but we will do our best to ensure that no more than the information that is necessary or desirable will be disclosed in the interests of producing a quality conference/event.

In addition to the suppliers we engage to supply goods and services for our clients' conferences and events, MCI may from time to time outsource management of certain functions, such as:

- our website and other information technology, including our data-base of contacts and clients; and
- marketing.

In such cases the external service provider may have access to personal information. In such cases it is our policy to include, where commercially possible, provisions in the contract with the service provider that obliges the service provider to comply with our privacy policy and to comply with the Privacy Act and Australian Privacy Principles.

We may also disclose your personal information to our professional advisers, such as our lawyers in any case where we need to seek advice.

We will not otherwise disclose your personal information to other third parties unless:

- we have your consent;
- making the disclosure is related to the primary purpose for which we have collected the information and we deem that you would reasonably have expected us to make the disclosure;

- we are required to do so by law, in which case we would inform you unless doing so itself is unlawful or would impede or defeat the purpose of the disclosure; or
- we are negotiating a sale of our business, 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 your personal information unless we have your express consent; or the sale is part of a sale of our business or a part of our business.

7. 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 we collect to any person overseas, we will obtain consent. It is not possible to list the overseas countries where we may need to do this – it will depend on each particular case.

8. SECURITY OF YOUR PERSONAL INFORMATION

It is not appropriate in this policy to provide specific details of security measures adopted by MCI to protect information held by it. To do so could compromise those security measures.

MCI will use an appropriate combination of:

- physical measures including locks and physical barriers;
- alarm systems;
- access technology, password systems and encryption where appropriate; and
- administrative protocols,

to exclude unauthorised persons or intruders from gaining access to the personal information we hold.

To maintain the integrity of information, MCI has acquired and will continue to acquire (within its means) computer virus prevention technology and makes use of other appropriate technology, such as password security protocols and "fire-walls" to exclude unauthorised access or hacking into its computer system.

9. YOUR ACCESS AND CORRECTION RIGHTS

The *Privacy Act* requires MCI to provide individuals access to the personal information which MCI holds about them - unless MCI is entitled under the *Privacy Act* or other legislation to deny access or provide an explanation for a decision instead.

When requesting access to personal information, MCI requires use of a written request.

MCI will respond to requests for access as soon as possible and will acknowledge the 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.

Some circumstances where it may be appropriate and lawful for MCI 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 information relates to existing or anticipated legal proceedings between MCI and the individual, and the information would not be available by the legal discovery processes;
- giving access would reveal MCI' intentions in relation to negotiations with the individual and prejudice those negotiations for MCI; 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 be entitled or perhaps required to deny access.

10. USE OF GOVERNMENT IDENTIFIERS

MCI may collect them but we will not use government identifiers such as tax file numbers or Medicare numbers as a means of identifying a person from whom the identifier has been collected.

11. ANONYMITY

Given the personal nature of our services, it is not normally appropriate for individuals to remain anonymous in their dealings with MCI. Use of our website would not normally involve our collection of personal information identifying the individual – unless the browser sends us an email via our website with identifying information in it.

12. CONTACTING MCI AND COMPLAINTS

If an individual:

- has an enquiry about our information management 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 our **Privacy Officer** by the following means:

Phone: 61 7 3858 5400

Fax: 61 7 3858 5499

Email: australia@mci-group.com

Postal Address: The Privacy Officer, MCI Pty Limited, Level 11, 87 Wickham Terrace, Spring Hill, Qld 4000.

Complaints will be dealt with in the first instance by our Privacy Officer or in his/her absence, by a person nominated by him/her. Complaints must be made in writing. This will allow us to deal with complaints in a professional, sensitive and consistent manner in compliance with the Act.

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 in that time. We will let you know if it is likely to take much 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 the MCI Privacy Officer.

The Privacy Officer will determine in the case of each complaint (if any) what is to be done, if anything, to redress the complaint. Also, the Privacy Officer will assess any whether the complaint demonstrates a systemic problem and will make recommendations to the management of MCI as to how to address/rectify such issues if they are identified.