

## **ENTRE NOUS PRIVACY POLICY**

Personal information is defined as any information about you that identifies you or information by which your identity can be determined.

### **Why we collect personal information.**

By the nature of our business, personal information is essential for Entre Nous to be able to provide you with the highest level of service.

By collecting personal information, we:

- Provide introduction services to you
- Give you the option of receiving our information and newsletters
- Include you in Entre Nous functions

If we do not collect and make use of your personal information, we are unable to provide you with our services.

### **How do we collect your personal information?**

Where possible we collect your personal information directly from you. Personal information is generally collected during the course of our contact with you.

In most cases we will require you to specifically consent to any collection, use or disclosure of your personal information by Entre Nous. We will usually request your consent verbally; sometimes your consent may be implied through your conduct with us.

However, no matter how your personal information is collected, Entre Nous deals with it in accordance with this privacy policy.

### **Consequences to you of Entre Nous not having that information.**

The nature of the service we provide means that, in most cases, if we do not collect your personal information, we will not be able to provide the services required of us by our members.

### **How we use your personal information**

We use the personal information we collect to provide member services to you and to include it in our direct marketing database and client databases.

## **Direct Marketing**

From time to time we may use your personal information to provide you with information about our services.

If you do not want to receive any of this information, please contact us on 03 9669 6000.

Once you have told us you no longer wish to receive information about our services, we will not send you any further material.

You can, however, change your mind about receiving information about our services at any time – you just need to let us know.

Entre Nous does not disclose your personal information to any party outside Entre Nous for the purpose of allowing them to market their products or services to you.

## **Do we disclose your personal information to anyone?**

Entre Nous will disclose your personal information in certain relevant circumstances and in the provision of our services to you.

We may disclose your personal information where you have consented to us doing so. Your consent to the disclosure of your personal information may be given explicitly such as in writing or verbally or may be implied from your conduct.

Where the provision of our services to you requires us to disclose your personal information to third parties (for the purpose of introductions), your consent will be implied when you engage us unless you tell us otherwise.

## **Ensuring your personal information is up to date.**

We rely on the personal information we hold about you to efficiently provide our services.

For this reason, it is very important that the personal information we collect from you is accurate, complete and up to date.

During the course of our relationship with you we will ask you to tell us of any changes to your personal information. However, you can contact us at any time to update your personal information or to tell us the information we hold about you is inaccurate or incomplete.

## **Is my personal information secure?**

Entre Nous takes all reasonable precautions to safeguard your personal information from loss, misuse, unauthorised access, modification or disclosure.

We employ a number of means to protect your personal information, including:

- External and internal premises security
- Restricted access to personal information
- Maintaining a secure computer network to prevent unauthorised access
- Regular reviewing and testing of our software in order to improve the level of security
- Internal policies in relation to Entre Nous computer use

When we no longer require your personal information, it is our policy to securely destroy the information or delete it from our systems. Generally this occurs seven years after your file has been archived.

## **Can I access my personal information?**

You may request access to any of the personal information we hold about you.

In most cases, a summary of personal information such as your name and address details, contact telephone numbers and the matters you have engaged us on are freely available to you by contacting us by any of the means set out at the end of this policy.

For more detailed requests for access to personal information, for example, access to information held in archives, a fee may be charged to cover the cost of retrieval and the supply of this information to you.

Entre Nous may be required by law to retain your personal information for a period of time after you have ceased your relationship with us. After the required time has passed, we attend to the secure destruction or deletion of your personal information. As noted above, this generally occurs after seven years.

## **Commonwealth identifier**

Entre Nous does not use Commonwealth identifiers as a means of identifying the personal information that we may have collected about you.

## **What is a Commonwealth identifier?**

A Commonwealth identifier is a Commonwealth Government or Commonwealth Government agency designated identification number such as your Tax File Number (TFN) or Medicare number.

## **Do I have to be identified at all?**

We may offer you the opportunity to deal with us anonymously, for example when making an inquiry about the type of services we offer. Otherwise the nature of the service we provide is such that anonymity cannot be maintained.

## **Sensitive information**

Personal information is regarded as sensitive information.

Sensitive information can be information about your:

- age
- health
- racial or ethnic origin
- political opinions
- membership of a political association
- religious beliefs or affiliations
- philosophical beliefs
- membership of a professional or trade association

Entre Nous will not disclose this information to other parties.

## **Security of your personal information online**

Generally, e-mail is not a secure way to communicate and you should be aware of this when sending personal information to us via e-mail.

## **Our Privacy Policy may change from time to time**

Entre Nous regularly reviews all its policies and procedures.

As a result we may change this Privacy Policy from time to time.

This Privacy Policy was last amended on March 1 2008.

## **Concerns or requests for access**

If you have a question about this Privacy Policy or wish to lodge a request to access your personal information you can contact us in any of the following ways:

By telephoning - 03 9669 6000

By writing to - Entre Nous  
Level 1, 21 Victoria Street  
Melbourne Victoria 3000

### **Can I complain about a breach of my privacy?**

If you believe that Entre Nous has not protected your personal information as set out in this Privacy Policy, you may lodge a complaint with us in any of the following ways:

By telephone: 03 9669 6000

In writing: The General Manager  
Entre Nous  
Level 1, 21 Victoria Street  
Melbourne Victoria 3000

### **What if I am not satisfied with the response?**

If you are not satisfied with the result of your complaint to Entre Nous, you can refer your complaint to the Federal Privacy Commissioner.

You can contact the Federal Privacy Commissioner:

By telephone: 1300 363 992

In writing: Director of Complaints  
Office of the Federal Privacy  
Commissioner  
GPO Box 5218  
SYDNEY NSW 1042