

Taylor Rose
Website Privacy Notice - www.taylor-rose.com.au

Introduction

Taylor Rose respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we collect, process and look after your personal data when you visit our website (regardless of where you visit it from) and tells you about your privacy rights and how the law protects you.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this notice together with any other privacy policy/notice or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements other notices and privacy policies and is not intended to override them.

We may update this notice at any time and any changes will be posted to our consultant website.



1. Defined Terms

"Company"	GTC Legal Pty Ltd (T/A Taylor Rose) and any successor practice and any service company owned or controlled by or on behalf of the Company or any of the Directors;
"Data Controller"	the person or organisation that determines when, why and how to process Personal Data and responsible for establishing practices and policies in line with Privacy Act 1988;
"Data Protection Legislation"	the Privacy Act 1988 and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time.
"Data Subject"	a living, identified or identifiable individual about whom we hold Personal Data. Data Subjects may be nationals or residents of any country and may have legal rights regarding their Personal Data;
"Legitimate Interest"	the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us;
"Personal Data"	<p>any information identifying a Data Subject or information relating to a Data Subject that we can identify, directly or indirectly, from that data alone or in combination with other identifiers we possess or can reasonably access. Personal Data includes Special Data and Pseudonymised Data but excludes anonymous data or data that has the identity of an individual permanently removed. Personal Data can be factual and include details such as a name, email address, identification number, location, date of birth an online identifier or an opinion about that person's actions or behaviour.</p> <p>Personal Data specifically includes, but is not limited to names, addresses, email addresses, online identifiers, dates of birth or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;</p>
"Pseudonymised Data"	means data where the information which directly or indirectly identifies an individual with one or more artificial identifiers or



pseudonyms so that the person to whom the data relates cannot be identified without the use of additional information which is kept separate and secure;

“Special Data” information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership, genetic and biometric data and data concerning health, sex life or sexual orientation;

“we”, “us”, “our” and “Taylor Rose” means or refers to the Company;

2. Notice statement

2.1 Taylor Rose will act as the Data Controller in relation to Personal Data used in our business for our own commercial purposes and is responsible for your Personal Data.

2.2 Taylor Rose is committed to ensuring that all Personal Data will be processed in accordance with Data Protection Legislation at all times.

2.3 In accordance with the Data Protection principles, the personal information held about you will be:

- used lawfully, fairly and in a transparent way.
- collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- relevant to the purposes we have told you about and limited only to those purposes.
- accurate and kept up to date.
- kept only as long as necessary for the purposes we have told you about.
- kept securely.

3. The data we collect about you

3.1 We may collect, use, store and transfer different kinds of Personal Data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, marital status, title, number of year PQE experience and gender.
- **Contact Data** includes address, email address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.



3.2 We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your Personal Data but is not considered Personal Data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

4. **Special Data**

4.1 Special Data requires higher levels of protection and further justification for collecting, storing and using this type of personal information. We have put in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

4.2 We do not collect any Special Data about you nor do we collect any information about criminal convictions and offences via our website.

5. **Failure to provide personal data**

Where we need to collect Personal Data by law and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services or information). In this case, we may have to cancel a service or request for information you have placed with us but we will notify you if this is the case at the time.

6. **Collection of personal data**

6.1 We use different methods to collect data from and about you including through:

a) **Direct interactions.** You may give us your Identity and Contact Data by filling in forms on our website or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- book to attend a seminar or workshop we are providing;
- subscribe to our service or publications;
- request information or marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us feedback or contact us.

b) **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

c) **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources, including Identity and Contact Data from data brokers or aggregators, and Technical Data from the following parties:



- book to attend a seminar or workshop we are providing;
- analytics providers such as Google; and
- advertising networks.

6.2 When you provide Personal Data to us relating to any third party, you confirm that you have any necessary consents or authority to do so. You are responsible for ensuring that that provision of Personal Data complies with Data Protection Legislation and other applicable law. You must have the authority to disclose Personal Data if it relates to someone else and all data disclosed should be complete, accurate and up to date.

7. How we use your personal data

7.1 We will only use your Personal Data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our Legitimate Interests (or those of a third party) for and your interests and fundamental rights do not override those interests. We make sure we consider and balance any potential impact upon you before processing your personal data.
- Where we need to comply with a legal obligation.

7.2 Regarding the lawful basis for our processing, most commonly we will rely on the performance of a contract with you, or alternatively that the processing is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests, or that the processing is necessary to comply with a legal obligation.

7.3 Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

7.4 We have set out below, in a table format, a description of all the ways we plan to use your Personal Data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register your details on our system	(a) Identity (b) Contact	To deal with your enquiries and requests ad to provide you with any information you request from us
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy notice (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c)Marketing and Communications	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to keep our records updated and to study how visitors use our website)



To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Usage (d)Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how visitors use our website, to develop our website and services offered and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Usage (d)Marketing and Communications (e) Technical	Necessary for our legitimate interests (to study how visitors use our website, to develop our website and services, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of visitors to our website, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

7.5 We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your Personal Data.

8. Marketing

8.1 We strive to provide you with choices regarding the use of your Personal Data, particularly around marketing and advertising.

8.2 We may use your Personal Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

8.3 In relation to marketing related communications, we will only provide you with such information after you have positively opted in by providing your express consent or if you have requested information from us relating to specific services we provide.



- 8.4 You have the opportunity to withdraw your consent and opt out of marketing communications at any time by following the opt-out links on any marketing message sent to you or by emailing opt-out@taylor-rose.co.uk. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.
- 8.5 We will get your express opt-in consent before we share your Personal Data with any third party for marketing purposes.

9. Website Links

Our website contains links to other websites, plug-ins and applications. Please note that we are not responsible for the privacy practices of such other websites and advise you to read the privacy notice of each website which collects Personal Data.

10. Change of purpose

- 10.1 We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.
- 10.2 If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- 10.3 Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

11. Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

12. Sharing your Personal Data

- 12.1 We may have to share your data with third parties, including third party service providers where we have instructed them to process Personal Data on our behalf and other entities within our group as part of our regular reporting activities on company performance, in the context of a business reorganisation, for system maintenance support and hosting of data. We require third parties to respect the security of your data and to treat it in accordance with the law.
- 12.2 All third-party service providers and other entities within our group are required to take appropriate security measures to protect your personal information in line with our policies. We remain responsible for your Personal Data and will use appropriate safeguards to ensure the integrity and security of your Personal Data. We do not allow our third-party service providers to use your Personal Data for their own purposes. We only permit them to process your Personal Data for specified purposes and in accordance with our instructions.



12.3 We may share your personal information with other third parties, for example in the context of a possible sale or restructuring of the business. In this situation, we will, so far as possible, share anonymised data with the other parties before the transaction completes. Once the transaction is completed, we will share your Personal Data with the other parties if and to the extent required under the terms of the transaction.

13. Data security

13.1 We have put in place appropriate security measures against unlawful or unauthorised processing of Personal Data, and against the accidental loss of, or damage to, Personal Data.

13.2 We limit access to your Personal Data to those persons who have a business need to know and they will only process your Personal Data on your instructions and are subject to a duty of confidentiality.

13.3 In the unlikely event of a data security breach such as data being lost or shared inappropriately, we have procedures in place to take appropriate action immediately to minimise any associated risk. We will notify you and any applicable regulator of a suspected data security breach if we are legally required to do so.

14. Data retention

14.1 We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

14.2 To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

14.3 In some circumstances you can ask us to delete your data as set out below in the section titled Data Rights.

14.4 In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

15. Data Rights

15.1 In certain circumstances, you have rights under Data Protection Legislation in relation to your Personal Data. These are detailed below. If you wish to exercise any of these rights please contact the person responsible for your Matter in the first instance or the Data Protection Officer.

15.2 You have the following rights in respect of your Personal Data:

- **Right of access.** You have the right to access your Personal Data, to receive a copy of the Personal Data we hold about you and to verify the lawfulness of processing. There are exceptions to this right and access could be denied.



- **Right to rectification.** You have the right to ask us to correct any Personal Data we hold about you where this is incomplete or inaccurate. We may need to verify the accuracy of the new data you provide to us. If this data has been shared with third parties, we will inform them of the rectification.
- **Right to erasure.** You have the right to ask us to delete or remove Personal Data where it is no longer necessary for us to continue to process it. You also have the right to ask us to remove or delete your Personal Data where you have successfully exercised your right to object to processing. If the data has been shared with third parties, we will inform them of the erasure.

We may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Primary instances of your data in our electronic systems will be erased as swiftly as possible. Personal data in backup archives are protected by strong encryption and retained for as little time as necessary before being automatically deleted. Personal data may remain in our backup archives if it is impractical to isolate your individual data.

Please be assured that after your right to erasure has been exercised, your Personal Data will not be restored back to production systems except in certain rare instances such as the need to recover from a natural disaster or serious security breach. If this rare instance was to occur and your Personal Data was restored from backups, we will take the necessary steps to erase the primary instance of the data again.

- **Right to restrict processing.** You have the right to ask us to suspend processing your Personal Data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Right to data portability.** You have the right to request the transfer of your Personal Data from us to you or to a third party. Upon receiving your instruction, we will send the data to you or the third party in a commonly used and machine readable format within one month of the request. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Right to object to processing.** In certain circumstances, you have the right to object to the processing of your Personal Data where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. We will stop processing your Personal Data in this situation immediately unless we demonstrate legitimate grounds for the processing which override your rights and freedoms.
- **Right to withdraw consent.** Where we are relying on your consent to the processing of your Personal Data, you have the right to partly or fully withdraw your consent at any time. This will not affect the lawfulness of any processing carried out prior to the date of your request. If you withdraw your consent, we may not be able to provide certain services to you and will advise you if this is the case at the time you withdraw your consent.



- 15.3 You will not usually have to pay a fee to access your Personal Data or to exercise any of the rights listed above. However we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
- 15.4 We will require specific information from you to help us confirm your identity and ensure your right to access your Personal Data or exercise any of your other rights is protected. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We will request proof of your identity and may also contact you to ask for further information in relation to your request to speed up our response.
- 15.5 We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

16. Changes

- 16.1 We keep this privacy notice under regular review.
- 16.2 We reserve the right to update and change this notice from time to time in order to reflect any changes to the way in which we process Personal Data and in response to guidance and best practice advice. Any changes to our privacy notice in the future will be posted to our Company website. Please ensure that you check this for any updates or changes.

Please do not hesitate to contact us should you have any queries regarding this notice or the Personal Data we hold about you.

Please let us know on the contact details above if you would like this notice in another format.