

PUBLIC RELEASABLE

# Privacy Policy - Website

x-RD Pty Ltd

**November 2024**



PUBLIC RELEASABLE

## Document Information

Document Reference Information	
File Name	20241101 - x-RD - Privacy Policy - Website v1.3
Policy number	XRDPOL008
Classification	<b>INTERNAL USE ONLY</b>

## Version Control

Version	Date	Author	Remarks
0.1	31 July 2021	Dan Riedel	Initial document creation
0.2	17 November 2023	Sam Marriott	Updated to new layout
0.3	1 November 2024	Sam Marriott	Updated to new layout

## Document Approval

Title	Name	Signature	Date
CEO	Grant Worner		22 November 2024

## Information Handling

The guidance, standard, policy or procedure information contained within this document is the property of x-RD Pty Ltd and is supplied without liability for errors or omissions. This information has been prepared for the staff of x-RD Pty Ltd who are authorised to use or copy the information only for the purposes for which it is intended, otherwise no other part may be reproduced, used or disclosed except as authorised in writing by the x-RD CEO or an authorised delegate.

This document is classified as PUBLIC RELEASABLE and is able to be released to the public. This document is to be handled in accordance with the x-RD Information Classification and Handling Standard.



## Table of Contents

<b>1. Introduction.....</b>	<b>1</b>
1.1 Background.....	1
1.2 Purpose.....	1
1.3 Scope.....	1
1.4 Review.....	1
1.5 Approval and Authorisation.....	1
<b>2. Privacy Policy.....</b>	<b>2</b>
2.1 Introduction.....	2
2.2 Consent.....	2
2.3 Personal Information we Collect.....	2
2.4 How We Collect and Manage Personal Information.....	3
2.5 Direct Marketing.....	5
2.6 Privacy on our Websites.....	5
2.7 CCPA Privacy Rights (do not sell my personal information).....	9
2.8 GDPR Data Protection Rights.....	10
2.9 Gaining Access to Personal Information We Hold.....	10
2.10 Keeping Personal Information Current.....	10
2.11 Children's Information.....	11
2.12 Complaints.....	11
2.13 How to Contact Us.....	11



## 1. Introduction

### 1.1 Background

x-RD operates and maintains a public facing website that is used to inform customers, stakeholders and other interested parties on information pertaining to x-RD and/or its products.

In the course of operating and maintaining this website x-RD may collect personal information and in doing so is committed to treating any information that is collected in accordance with the Australian Privacy Principles in the Privacy Act 1988 (Cth).

### 1.2 Purpose

The purpose of this policy is to inform users of x-RD's website on x-RD's personal information handling practices and privacy controls.

### 1.3 Scope

This policies applies to any users of x-RD's website.

### 1.4 Review

This policy is to be reviewed annually

### 1.5 Approval and Authorisation

This policy is to be approved by the x-RD CEO



## 2. Privacy Policy

### 2.1 Introduction

x-RD Pty Ltd (x-RD) is committed to treating the personal information we collect in accordance with the Australian Privacy Principles in the Privacy Act 1988 (Cth) (the Privacy Act). This Privacy Policy sets out how x-RD handles personal information.

This Privacy Policy does not apply to personal information collected by x-RD that is exempt under the Privacy Act.

x-RD may modify this Privacy Policy from time to time to reflect its current privacy practices.

In this Privacy Policy, 'x-RD', 'we', 'us' and 'our' is a reference to x-RD Pty Ltd and includes any entity carrying on business in Australia that is part of the x-RD group of entities.

### 2.2 Consent

By using our services and website, you hereby consent to our Privacy Policy and agree to its terms.

### 2.3 Personal Information we Collect

The types of personal information we collect depend on the nature of our engagement with you. Examples of personal information we may collect include:

- Names, job titles, contacts, and address details
- Company name, contact and address details
- Information in identification documents (for example: passport or driver's license)
- Date of birth and gender
- Bank account details
- Details of insurance arrangements
- Educational qualifications, employment history, salary, and referee reports
- Visa or work permit status
- Your internet protocol (IP) address
- Payment details



- Contents of messages and/or attachments that you may send us, and
- Any other information you may choose to provide

It may be necessary in some circumstances for x-RD to collect sensitive information about you in order to provide specific services or for recruiting purposes. Examples of the types of sensitive information that may be collected in such circumstances include professional memberships, ethnic origin, criminal record, and health information.

It is generally not practical to remain anonymous or to use a pseudonym when dealing with x-RD as usually we need to use your personal information to provide specific services to you, or which relate to or involve you.

## **2.4 How We Collect and Manage Personal Information**

### **How we collect personal information**

Generally, we collect your personal information from you directly (for example, when we deal with you in person or over the phone, when you send us correspondence (including via email), when you complete a questionnaire, form, or survey, when you subscribe to our publications or when you use our website or our social media).

### **Where you provide us with personal information about someone else**

If you provide us with someone else's personal information, you should only do so if you have their authority or consent to provide us with that information. You should also take reasonable steps to inform them of the matters set out in this Privacy Policy or any Privacy Collection Statement we give you.

### **Holding personal information**

x-RD holds personal information in hard copy and electronic formats. We take security measures to protect the personal information we hold including physical (for example, access-controlled offices and storage of files in lockable cabinets) and technological (for example, restriction of access, firewalls, the use of encryption, passwords, and multifactor authentication).

We also have policies and processes which govern document retention and data breach incidents. In some cases, x-RD engages third parties to host electronic data (including data in relation to the services we provide) on our behalf.

### **Purpose for collection, holding and disclosing personal information**



x-RD collects, holds, and uses personal information for a number of purposes, including:

- To provide and enhance our services and websites
- To respond to requests or queries
- To maintain contact with our clients and other contacts (including alumni), and keep them informed of our services, industry developments, seminars and other events
- To verify your identity
- For administrative purposes, including processing payment transactions
- For recruitment purposes
- For purposes relating to the employment of our personnel, providing internal services or benefits to our partners and staff and for matters relating to the partnership
- When engaging service providers, contractors, or suppliers relating to the operation of our business
- To manage any conflict of interest or independence (including auditor independence) obligations or situations
- To conduct surveys
- For seeking your feedback
- To meet any regulatory obligations, or
- To develop our expertise and know-how, for benchmarking purposes, analytics, quality assurance and thought leadership and other purposes related to our business.

As part of an engagement, if you are a customer, an employee, a contractor, or supplier of services to one of our clients, then we may disclose your personal information as part of providing services to that client.

The types of third parties to whom we may disclose your personal information include:

- Experts or other third parties contracted as part of an engagement
- Our agents, third party contractors and suppliers
- Our professional advisers



- Government or regulatory bodies or agencies, as part of an engagement or otherwise

We do not disclose personal information to third parties for the purpose of allowing them to send marketing material to you. However, we may share non-personal, de-identified or aggregated information with select third parties for research or promotional purposes other than direct marketing.

## 2.5 Direct Marketing

x-RD may use your personal information for the purpose of marketing its services to you.

If you do not want to receive marketing material from us, you can contact us as detailed below:

- For electronic communications, you can click on the unsubscribe function in the communication, or
- For hard copy communications, you can email [unsubscribe@x-rd.com.au](mailto:unsubscribe@x-rd.com.au), or
- Via our website at [x-rd.com.au/contact](https://x-rd.com.au/contact)

## 2.6 Privacy on our Websites

### Automatic collection of personal information

Cookies, web beacons and other technologies are used by x-RD and its service providers on some x-RD websites and through email to automatically collect certain types of information. The collection of this information allows us to customize your online experience (including tailored x-RD marketing), to improve the performance, usability, and effectiveness of x-RD's online presence and to measure the effectiveness of our marketing activities.

If you register or log in to an x-RD website and provide information about your preferences, we will use your information to personalize your user experience. If you register or log into a x-RD website using a third-party account (such as LinkedIn, Apple, Google or X), we may collect any information you have permitted the third-party service to share, including your name and email address, depending on the privacy settings you have set with the third-party service and their privacy policy.

### IP Address





An IP address is a number assigned to your computer whenever you access the internet. It allows computers and servers to recognize and communicate with one another.

Public IP addresses from which visitors appear to originate may be recorded for IT security and system diagnostic purposes. This information may also be used in aggregate form to conduct website trend and performance analysis, and to enhance user experiences.

### **Cookies**

Like any other website, the x-RD website used 'cookies'. These cookies are used to store information including visitor's preferences, and the pages on the website that the visitor accessed or visited. The information is used to optimize the users' experience by customizing our web page content based on visitors' browser type and/or other information.

Although most browsers automatically accept cookies, you can choose whether to accept cookies via your browser's settings (often found in your browser's Tools or Preferences menu).

You may also delete cookies from your device at any time. However, please be aware that if you do not accept cookies, you may not be able to fully experience some of our websites' features.

Cookies themselves do not tell us your email address or otherwise identify you personally. In our analytical reports, we may obtain other identifiers including public IP addresses, but this is for the purpose of identifying the number of unique visitors to our web sites and geographic origin of visitor trends and is not used to identify individual visitors.

For more general information on cookies, please read: [What are Cookies](#).

### **Analytic tools**

The x-RD website uses analytic tools, such as Google Analytics and Adobe Analytics. To provide website visitors with more choice on how their data is collected by Google Analytics, Google has developed the [Google Analytics Opt-out Browser Add-on](#).

The add-on communicates with Google Analytics JavaScript (ga.js) to indicate that information about the website visit should not be sent to Google Analytics.



The Google Analytics Opt-out Browser Add-on does not prevent information from being sent to the website itself or to other web analytics services.

More information about how Google Analytics is used by x-RD can be found here: [Terms of Service](#).

Adobe also provides a range of opt-out options for Adobe Analytics.

### **Web beacons**

A web beacon is a small image file on a web page that can be used to collect certain information from your computer such as an IP address, the time that content was viewed, a browser type, and the existence of cookies previously set by the same server.

The x-RD website or its service providers may use web beacons to track the effectiveness of third-party websites that provide us with recruiting or marketing services or to gather aggregate visitor statistics and manage cookies.

You have the option to render some of the web beacons unusable by rejecting their associated cookies. The web beacon may still record an anonymous visit from your IP address, but cookie information will not be recorded.

In some of our newsletters and other communications, we may monitor recipient actions such as email open rates through embedded links within the messages. We collect this information to gauge user interest and to enhance future user experiences.

### **Location-based tools**

The x-RD website may collect and use the geographical location of your computer or mobile device. This location data is collected for the purpose of providing you with information regarding services which we believe may be of interest to you based on your geographic location, and to improve our location-based products and services.

### **Social media widgets and application**

Some x-RD websites and services may include functionality to enable information sharing via third party social media applications, such as the Facebook Like button and X widget.

These social media applications may collect and use information regarding your use of x-RD websites. Any personal information that you provide via such social media applications may be collected and used by members of those social media applications separate to x-RD.



Such interactions that are monitored by social media applications are governed by privacy policies of the relevant companies that provide the applications. We do not have control over, or responsibility for, those companies or their use of your information.

In addition, x-RD websites or affiliate websites may host blogs, forums, crowdsourcing and other applications or services (collectively “social media features”). The purpose of social media features is to facilitate the sharing of knowledge and content.

Any personal information that you provide on any x-RD social media feature may be shared with other users of that social media feature (unless otherwise stated at the point of collection), over whom we may have limited or no control.

### **Log files**

The x-RD website follows a standard procedure of using log files. These files log visitors when they visit websites. All hosting companies do this and are a part of hosting services' analytics. The information collected by log files includes IP addresses, browser type, Internet Service Provider (ISP), date and time stamp, referring/exit pages and possibly the number of clicks. These are not linked to any information that is personally identifiable. The purpose of the information is for analysing trends, administering the site, tracking users' movements on the website, and gathering demographic information.

### **Links to Third party Websites**

x-RD websites may contain links to third party websites, including sites maintained by other x-RD affiliates. Those other websites are not subject to our privacy policy and procedures. You will need to review those websites to view a copy of the relevant privacy policy.

Unless expressly advised, x-RD does not endorse, approve, or recommend the services or products provided on third party websites.

### **Third Party Privacy Policies**

The x-RD website's Privacy Policy does not apply to other advertisers or websites. Thus, we are advising you to consult the respective Privacy Policies of these third-party ad servers for more detailed information. It may include their practices and instructions about how to opt out of certain options.



You can choose to disable cookies through your individual browser options. To know more detailed information about cookie management with specific web browsers, it can be found at the browser's respective websites.

### **Advertising Partners Privacy Policies**

You may consult this list to find the Privacy Policy for each of the advertising partners of the x-RD website.

Third party ad servers or ad networks use technologies like cookies, JavaScript, or Web beacons in their respective advertisements with links that appear on the x-RD website, which are sent directly to the users' browser. They automatically receive your IP address when this occurs. These technologies are used to measure the effectiveness of their advertising campaigns and/or personalize the advertising content that you see on websites that you visit.

Note that the x-RD website has no access to or control over these cookies that are used by third party advertisers.

### **Your Choices**

You have several choices regarding your use of x-RD websites. In general, you are not required to provide personal information when you visit our websites. However, if you make an enquiry or subscribe to receive information about our services, events and industry updates or wish to apply for a job, provision of certain personal information will generally be required to facilitate such requests.

## **2.7 CCPA Privacy Rights (do not sell my personal information)**

Under the CCPA, among other rights, California consumers have the right to:

- Request that a business that collects a consumer's personal data disclose the categories and specific pieces of personal data that a business has collected about consumers
- Request that a business delete any personal data about the consumer that a business has collected
- Request that a business that sells a consumer's personal data, not sell the consumer's personal data

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us.



## 2.8 GDPR Data Protection Rights

We would like to make sure you are fully aware of all your data protection rights. Every user is entitled to the following:

- The right to access – You have the right to request copies of all your personal data. We may charge you a small fee for this service
- The right to rectification - You have the right to request that we correct any information you believe is inaccurate. You also have the right to request that we complete the information you believe is incomplete
- The right to erasure – You have the right to request that we restrict the processing of your personal data, under certain conditions
- The right to object to processing – You have the right to object to our processing of your personal data, under certain conditions
- The right to data portability – You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us.

## 2.9 Gaining Access to Personal Information We Hold

You can request access to your personal information, subject to some limited exceptions as permitted or required by law. Such requests must be made in writing to x-RD's Privacy Liaison. Please contact us via our website at [x-rd.com.au/contact](https://x-rd.com.au/contact).

x-RD may charge reasonable costs for providing you with access to your personal information.

## 2.10 Keeping Personal Information Current

If you believe that any personal information x-RD has collected about you is inaccurate, not up-to-date, incomplete, irrelevant, or misleading, you may request a correction. To do so, please contact x-RD's Privacy Liaison and we will take reasonable steps to correct it in accordance with the requirements of the Privacy Act. Please contact us via our website at [x-rd.com.au/contact](https://x-rd.com.au/contact).



## 2.11 Children's Information

Another part of our priority is adding protection for children while using the internet. We encourage parents and guardians to observe, participate in, and/or monitor and guide their online activity.

The x-RD website does not knowingly collect any personal identifiable information from children under the age of 13. If you think that your child provided this kind of information on our website, we strongly encourage you to contact us immediately and we will do our best to promptly remove such information from our records.

## 2.12 Complaints

If you wish to make a complaint to x-RD about our handling of your personal information, you can contact x-RD's Privacy Liaison via our website at [x-rd.com.au/contact](https://x-rd.com.au/contact). Following your initial contact, you will be asked to set out the details of your complaint in writing using a provided form.

x-RD will endeavour to reply to you within 30 days of receipt of the complete complaint form and, where appropriate, will advise you of the general reasons for the outcome of the complaint.

In some circumstances, x-RD may decline to investigate the complaint (for example, if the complaint relates to an act or practice that is not an interference with the privacy of the person making the complaint).

If you are not satisfied with the outcome of your complaint, you can refer your complaint to the Office of the Australian Information Commissioner.

## 2.13 How to Contact Us

If you have a query in relation to this Privacy Policy, or would like to notify x-RD that you: no longer wish to receive marketing material from us, want to access or correct your personal information, or wish to make a complaint about x-RD's handling of your personal information; please contact x-RD as follows:

Privacy Liaison

x-RD Pty Ltd

PO Box 9422

Deakin ACT 2600



email: [privacy@x-rd.com.au](mailto:privacy@x-rd.com.au)

website: [x-rd.com.au/contact](http://x-rd.com.au/contact)



