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IMC PACIFIC PTY LTD

ACN: 099 273 846

PRIVACY POLICY

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## 1. INTRODUCTION

### 1.1 THIS POLICY

IMC Pacific Pty Ltd, ACN 099 273 846 (“**IMC Pacific**”) is required by the Australian Privacy Principles (“**APPs**”) in the Privacy Act 1988 (Cth) (“**Privacy Act**”) to have in place a clearly expressed and up-to-date privacy policy describing how it manages personal information it collects in the course of its activities.

This Policy describes:

- the kinds of personal information IMC Pacific collects and holds;
- the purposes for which IMC Pacific collects, holds, uses and discloses personal information;
- how IMC Pacific collects and holds personal information;
- how an individual may access personal information about the individual that is held by IMC Pacific, and seek the correction of such information if required;
- how an individual may complain about a breach of the APPs, and how IMC Pacific will deal with such a complaint; and
- the likelihood IMC Pacific will disclose personal information to third parties, including overseas recipients, and to the extent practicable, countries in which such recipients are likely to be located.

This Policy is mainly relevant to the way in which IMC Pacific conducts its recruitment and organisational development functions, including recruitment analysis and planning, and branding exercises such as competitions and networking events. This Policy does not apply to the handling of personal information collected by IMC Pacific that is exempted under the Privacy Act, such as the handling of employee records for the purpose of the employment relationship.

## 2. COLLECTION, STORAGE, USE, AND DISCLOSURE OF PERSONAL INFORMATION

### 2.1 PURPOSES OF COLLECTION, STORAGE, USE AND DISCLOSURE OF PERSONAL INFORMATION

IMC Pacific collects personal information for the purpose of its recruitment and organisational development functions, including recruitment analysis and planning, and branding exercises such as competitions and networking events (“**Relevant Activities**”). This can include processes surrounding the hiring of candidates, referrals, for example, from external recruiters, staff, and other companies within the IMC Financial Markets group (“**IMC Companies**”), recruitment competitions and promotional activities, and the analysis of recruitment information to plan and improve IMC Pacific's and other IMC Companies' approach to recruitment.

## **2.2 COLLECTION AND STORAGE OF PERSONAL INFORMATION**

### **2.2.1 Types of personal information**

During the course of its Relevant Activities, IMC Pacific may solicit personal information, including:

- names, job titles, contact and address details;
- information in identification documents (for example, passport, driver's license);
- date of birth and gender;
- educational qualifications, employment history, salary and referee reports;
- visa or work permit status;
- payment details; and
- personal information about spouse and dependents.

In addition to the above, it may also be necessary in some circumstances for IMC Pacific to collect sensitive information to perform its Relevant Activities. Examples of the types of sensitive information that may be collected in such circumstances include professional memberships, criminal record, and health information (eg a disability relevant to an individual's employment).

In the course of its Relevant Activities, it is generally not practical for IMC Pacific to provide an option to remain anonymous or to use a pseudonym, as usually personal information is required for IMC Pacific to perform Relevant Activities and services, as outlined below.

### **2.2.2 Methods of collection**

IMC Pacific may collect personal information for its Relevant Activities in the following ways:

- in person;
- by telephone;
- through correspondence that is sent to IMC Pacific;
- when a questionnaire, form, or survey is completed;
- when an individual enters a competition with IMC Pacific;
- through IMC Pacific's website and social media pages; and
- through publicly available information.

IMC Pacific collects personal information directly from the individual to whom the information relates where practicable. However, IMC Pacific may also collect personal information from a third party, such as an external recruiter, a candidate's referee or other IMC Companies, or through a publicly available record.

### **2.2.3 Storing personal information**

IMC Pacific stores personal information in hard copy and electronic formats. IMC Pacific is committed to ensuring that personal information is held securely. The security measures it takes to protect the personal information it holds are both physical (such as security passes to enter its offices, and storage

of files in lockable cabinets), as well as technological (such as access restrictions, firewalls, and passwords).

## **2.3 USE AND DISCLOSURE OF PERSONAL INFORMATION**

### **2.3.1 General use and disclose**

IMC Pacific uses and discloses personal information for the purposes of its Relevant Activities, as stated in 2.1 above.

As part of the IMC Financial Markets group consisting of multiple affiliated companies and offices internationally, IMC Pacific uses resources located throughout the world. For the purpose of the Relevant Activities (including the Relevant Activities of other IMC Companies), personal information may be transferred and/or disclosed to any IMC Company, to third party suppliers and to third parties acting on IMC's behalf, which are located in countries including, but not limited to, the Netherlands, the UK, and the United States. This may involve transfers of personal information to servers and databases outside Australia.

## **3 INDIVIDUALS' RIGHTS**

### **3.1 ACCESSING AND CORRECTING PERSONAL INFORMATION**

#### **3.1.1 Accessing personal information**

Personal information provided to IMC Pacific may be accessed by whom it relates to, subject to some limited exceptions permitted or required by law. A request to view the personal information which IMC Pacific has recorded should be sent in writing, or by email, to the addresses noted in section 3.3.

IMC Pacific may ask the individual to prove their identity.

IMC Pacific will respond to an access request within a reasonable period.

#### **3.1.2 Correction of personal information**

IMC Pacific will endeavour to ensure that all personal information it keeps is accurate, current, complete, relevant and not misleading. An individual about whom personal information is recorded by IMC Pacific may request a correction of that personal information, should the individual believe this to be necessary. A request to IMC Pacific to correct personal information IMC Pacific has recorded should be sent in writing, or by email, to the addresses noted in section 3.3.

IMC Pacific may ask the individual to prove their identity for this purpose.

IMC Pacific will respond to a correction request within a reasonable period.

If IMC Pacific corrects personal information, following a request, or of its own accord, it will take reasonable steps to notify the individual to whom the personal information relates.

### **3.2 LODGING A COMPLAINT REGARDING PRIVACY ISSUES**

If individuals have concerns regarding IMC Pacific's compliance with the APPs, or this Policy, in handling personal information, they may lodge a complaint to IMC Pacific. A complaint should be

made in writing, or by email, to the addresses noted in section 3.3. The complaint should clearly state the reasons why the individual believes IMC Pacific handled their personal information inappropriately.

Upon receipt, IMC Pacific will consider the complaint, and will respond within a reasonable period, outlining any actions taken in respect of the complaint.

If an individual is not satisfied with IMC Pacific's response to their complaint, they may complain to the Office of the Australian Information Commissioner ([www.oaic.gov.au](http://www.oaic.gov.au))

IMC Pacific has no obligation under this Policy to assess complaints regarding aspects of its recruitment processes which do not relate to matters regarding its handling of personal information.

### **3.3 CONTACT DETAILS**

IMC Pacific may be contacted regarding the matters discussed in this Policy via the following means:

- Postal address:  
Level 42, Grosvenor Place  
225 George Street  
Sydney NSW 2000
- Telephone number:  
+61 (02) 8264 4700
- Email address:  
[sydcareers@imc.com](mailto:sydcareers@imc.com)