

In this Privacy Policy a reference to Squire Patton Boggs means Squire Patton Boggs (AU), every Squire Patton Boggs office globally, and any of the Squire Patton Boggs (AU) subsidiaries or related entities from time to time.

This Privacy Policy explains what types of information we collect from you, how we may use it, who we may disclose it to and how you can change information that you provide to us.

The Privacy Policy applies to all of the client relationships, potential client relationships and legal services offered by Squire Patton Boggs and applies regardless of which country you access our legal services from or how you access those services.

By engaging Squire Patton Boggs to act as your solicitors or agents, you consent to our collection, use and transfer of information provided by you in accordance with the terms of this Privacy Policy.

If you do not agree with this Privacy Policy, do not continue to use our services.

Information We Collect

1. Client information

Squire Patton Boggs collects information about:

- (a) clients, business associates and potential clients and their employees;
- (b) suppliers and their employees;
- (c) prospective employees, employees and contractors; and
- (d) other people who come into contact with members of Squire Patton Boggs.

If you enter into, or consider entering into, an agreement for legal services with Squire Patton Boggs, we may collect some or all of the following information from you:

- (a) your full name and address;
- (b) your e-mail address or telephone number;
- (c) your date of birth and gender;
- (d) your bank details for payments, invoices or reimbursements;
- (e) information about your legal issues and personal circumstances; and
- (f) any other information which you provide to us.

We may combine the information which you provide to us with other information we collect from other sources and, if we do so, our use of the resulting combined information will be subject to this Privacy Policy.

Where this information is considered to be "personal information" under the *Privacy Act 1988* (Cth) and the Australian Privacy Principles, that personal information is collected and used in accordance with the Australian Privacy Principles.

2. Failure to provide information

If you don't provide us with some or all of the above information, this may affect our ability to provide you with legal services.

3. Information collected through automatic data collection

The Squire Patton Boggs website uses "cookies" (which are small data files containing information about you that is stored on your hard drive), "embedded scripts", and other similar tracking technologies (**Tracking Technologies**) to collect information about you. We do not collect personal information through unreasonably intrusive means such as address harvesting software.

Some Tracking Technologies are used to track your interaction with the website and target your interests to enhance your website experience. We may also use Tracking Technologies to collect "clickstream" data, such as the domain name of the service providing you with internet access, the internet protocol (IP) address used to connect your computer to the internet, your browser type and version, operating system and platform, the average time spent on our website, pages viewed, content searched for, access times and other relevant statistics, and assign unique identifiers to the device you use to access the website for the same purposes.

You can set your browser not to accept cookies. The following websites tell you how to remove cookies from your browser: www.aboutcookies.org or www.allaboutcookies.org.

However in a few cases some of our website features may not function as a result.

4. Methods of collecting information

Squire Patton Boggs will generally collect personal information by way of forms filled out by people, face-to-face meetings, interviews, business cards, telephone conversations and from third parties.

In some circumstances Squire Patton Boggs may be provided with personal information about an individual from a third party, for example a report provided by a medical professional or a reference from another person.

How we use Information

1. Permitted uses

Squire Patton Boggs may use and disclose your personal information for the primary purpose for which it is collected, for reasonably expected secondary purposes which are related to the primary purpose and in other circumstances authorised by the Privacy Act.

In general, Squire Patton Boggs will use and disclose your personal information for the following purposes:

- (a) to conduct its business;
- (b) to provide and market its services;
- (c) to communicate with you;
- (d) to purchase from you;
- (e) to comply with its legal obligations; and
- (f) to help it manage and enhance its services.

Disclosure of Information to Others

1. General disclosures

Squire Patton Boggs may disclose your personal information to:

- (a) other offices of Squire Patton Boggs;
- (b) other companies or individuals who assist Squire Patton Boggs in providing services or who perform functions on its behalf (such as mailing houses, specialist consultants and barristers);
- (c) courts, tribunals and regulatory authorities; and
- (d) anyone else to whom you authorise them to disclose it.

Squire Patton Boggs also collects personal information from these organisations and individuals, and deals with that information in accordance with this Privacy Policy.

2. Overseas data transfers

Squire Patton Boggs will not send your personal information to recipients outside of Australia without:

- (a) obtaining your consent (in some cases this consent will be implied); or
- (b) otherwise complying with the Privacy Act.

Squire Patton Boggs may disclose your personal information to other offices of Squire Patton Boggs, including offices located outside Australia.

You consent to any such transfers, provided that they are otherwise in accordance with this Privacy Policy.

3. Third party data transfers

We will only transfer your personal information to third parties, other than those listed above, in the following circumstances:

- (a) to protect or defend the legal rights or property of Squire Patton Boggs, our affiliated and group companies or their employees, agents and contractors (including enforcement of our agreements);
- (b) to protect the safety and security of our website and clients;
- (c) protect against fraud or for risk management purposes;
- (d) if we believe your actions violate this Privacy Policy;
- (e) to comply with law or legal process; or
- (f) to enable the sale of Squire Patton Boggs or its assets.

Opting-Out of Marketing and Promotional Use

We would like to send you marketing and promotional information about the products and services of Squire Patton Boggs. We comply with the provisions of the *Spam Act 2003* (Cth).

If you have consented to receive such information, you may opt out at a later date by phoning us on +61 8 9429 7444 or by following the instructions in the particular marketing communication.

Data Collection from Children and Lack of Consent

We do not knowingly collect personal information from children under 13 without appropriate parental notice and consent.

Sensitive Information

Some personal information that Squire Patton Boggs collects is 'sensitive information'. Sensitive information includes: information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences and criminal record, which is also personal information; and health information about an individual.

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or where certain other limited circumstances apply (e.g. where required by law).

Management of Personal Information

The Privacy Act requires Squire Patton Boggs to take reasonable steps to protect the security of personal information. Squire Patton Boggs personnel are required to respect the confidentiality of personal information and the privacy of individuals.

Squire Patton Boggs takes reasonable steps to protect personal information held from misuse and loss and from unauthorised access, modification or disclosure, for example by use of physical security and restricted access to electronic records.

Where Squire Patton Boggs no longer requires your personal information for a permitted purpose under the Privacy Act, we will take reasonable steps to destroy it.

We maintain certain technical and security safeguards to protect the information which you disclose to us. However, it is possible that third parties may unlawfully intercept or access transmissions or private communications over an unsecured transmission. We also limit access to the Website by our own employees, contractors, Website service providers and those individuals who are authorised for the proper handling of such information. We request that our third party contractors and Website service providers follow similar standards of security and confidentiality.

Your Rights

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please phone us on +61 8 9429 7444. We may request you cover our reasonable costs for providing you access.

We want to make sure that your personal information is up to date. You may ask us to correct or remove information which you think is inaccurate.

If you have any queries or concerns about your rights please contact the Australian Information Commissioner (OAIC).

Links

Squire Patton Boggs is not responsible for the privacy practices of any third party websites or other services operated by third parties that are linked to or integrated with our website. Please refer to those parties' websites to view their privacy policies.

Privacy Policy Changes

From time to time we may modify this Privacy Policy to reflect industry initiatives or changes in the law, our information collection and use practices, the features of our services, or technology, and such modifications shall be effective upon posting. Your continued use of our services after we notify you of our revised Privacy Policy signifies your acceptance of the revised Privacy Policy.

Please review this Privacy Policy regularly to ensure you are updated as to any changes.

Accuracy and Amendments to your Information

We are not responsible for any problems that may arise if you do not give us accurate, truthful or complete information or if you fail to update such information. We will reject and delete any entry that we believe in good faith to be false, fraudulent or inconsistent with this Privacy Policy.

If you wish to amend any of your details or the information which you have provided to us please contact us using the details below.

Contact Us

If you have any questions about our privacy practices or any of the terms or conditions of this Privacy Policy, please feel free to contact us on:

Phone: +61 8 9429 7444

OR

Mail: Level 21, 300 Murray Street, Perth WA 6000

This Privacy Policy was last modified on February 24th 2014 and is effective immediately.

The contents of this update are not intended to serve as legal advice related to individual situations or as legal opinions concerning such situations nor should they be considered a substitute for taking legal advice.

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