

SenateSHJ Privacy Policy (January 2025)

1. About this policy

This policy covers how we collect, use, disclose and otherwise handle personal information.

We will make changes to this privacy policy from time to time. When we make changes, we will update this policy on our website.

2. About us

In this policy, when we say 'we', 'us', and 'our', we mean Scaffidi Hugh-Jones Pty Ltd (ACN 126 085 952) as trustee of the Scaffidi Hugh- Jones Trust ('Senate Australia'), trading in New Zealand and Australia as 'Senate SHJ'.

3. Relevant privacy law

When we say 'privacy law' in this policy, we are referring to the law in force at the time that you interact with us that covers the collection, use, storage, and disclosure of personal information, including but not limited to:

- in New Zealand, the Privacy Act 2020
- in Australia, the Privacy Act 1988 (Cth).

4. Information we collect

We may collect the following information about you, either directly from you or from persons associated with you, or from publicly-available sources (where permitted by privacy law):

Personal information collected	When collected	Why collected
Your name and contact details	When you first contact us (including when you use our website and/or subscribe to our newsletters)	To communicate with you in connection with the provision of our services
Other personal information that you or another person provide us, or that we collect from publicly available sources	At the time you or another person provide that information to us, or in the ordinary course of providing services to you or any other person	To provide our services to you or any other person To help manage the services we provide to you or any other person
Information that we collect from you when seeking feedback on our services	At the time we seek that feedback from you	For the purposes of using that feedback to improve our services
Any other personal information we collect about you, including the above	The circumstances described above, and otherwise during your interaction with us	For the purposes set out in paragraph 5 (Other use of personal information)

While you do not have to give us your personal information, if you do not, we may not be able to provide our services to you or persons associated with you.

5. Other use of personal information

We only use your information in the way described in this notice, or if we're permitted or required to do so under privacy law.

In addition to the specific purposes outlined in paragraph 4, we may, and you authorise us to, use your personal information:

- to comply with the law;
- to respond to legitimate enquiries by government agencies and others, where we are required to do so;
- to respond to your enquiries and communicate with you; and
- for any other purposes for which give us permission.

6. Information you give to us about other people

If you provide us with another person's personal information, you confirm that you are permitted to do so (including that you have that person's authority to do so and that person knows that their information may be used by us in the circumstances set out in this policy).

7. Where personal information is held

We may hold your personal information ourselves – for instance, on servers or in physical files located on our premises. Alternatively, our service providers may store your information on our behalf (including the service providers referred to in paragraph 8).

8. Sharing personal information

In addition to the specific ways described throughout this notice, we may, and you authorise us to, share personal information in the following circumstances:

- SenateSHJ may share personal information for the purposes of providing or coordinating the provision of services to SenateSHJ, or otherwise in connection with the operation of the Senate SHJ business, including for the purposes of file management, billing, and debt recovery.
- We may share personal information with subcontractors who are engaged to help us deliver services to our clients, for the purposes of delivering those services.
- We may share personal information with our service providers, who agree to hold or process personal information on our behalf, including the provider of our IT systems, our professional advisors, and providers of other services to us in connection with the operation of the Senate SHJ business.
- We may share personal information with law enforcement, security agencies, other government authorities, and any other person, where we are permitted to or required to under privacy law.
- We may share personal information with persons involved in a corporate restructuring, sale, or assignment of assets, merger, divestiture, or other changes of control or financial status of Senate SHJ.

9. Cross border disclosure

The persons with whom we share personal information are for the most part located in Australia, although we may share your information with service providers or subcontractors located in other jurisdictions including New Zealand (and where we do so, we will do so in accordance with privacy law).

10. Your rights

You have the right to request access to, and correction of, the personal information that we hold about you. If you would like to exercise these rights, please contact us using the contact details at paragraph 13 below.

11. Keeping us updated

It is important that the personal information that we hold about you is accurate and complete. Please let us know if you think we may need to make changes to the personal information we hold about you using the contact details at paragraph 13 below.

12. Complaints

We will deal with any complaints about the manner in which we handle personal information and otherwise comply with privacy law in accordance with our obligations under privacy law. If you have a complaint, please contact us using the contact details at paragraph 13 below.

If you are not satisfied with how we handle your complaint, you may contact the appropriate regulator, being the [Office of the Australian Information Commissioner](#).

13. Contacting us

Our contact details for all matters relating to this policy are as follows:

Postal:

SenateSHJ, Suite 7.01, Level 7,
Australian Square, Plaza Building
95 Pitt Street, Sydney 2000

Email: privacy@senateshj.com.au

14. Update

The content of the security awareness training program must be reviewed and updated annually, or when significant changes to the enterprise occur.

15. Revision history

Version	Revision Date	Revision Description	Name
Version 1	05/06/23	Prepared for SenateSHJ by Dentons (NZ)	Brendon O'Connor
Redraft	09/01/25	Updated for new SenateSHJ structure	Brendon O'Connor
Final (V2)		Reviewed and signed off	Darren Behar