

## Personal Information Collection Notice

### **Overview:**

Aha! Consulting is an Engagement and Facilitation company based in North Perth in WA. During projects we can be required to collect personal data from individuals or businesses. This document outlines what happens to that data.

**The type of personal information we might collect and sometimes hold, depends on each project and each client. This may include the following:**

- Name of individual or business
- Phone number and/or email address
- Workplace
- Address details
- Family structure
- Household income or business turnover
- Views on different topics and issues

**There are multiple ways one's personal information can be collected and sometimes held by Aha! Consulting:**

- Online or print based survey
- Small group interview notes (in person or online)
- Workshop notes
- Stakeholder list/database

**There are several purposes for which Aha! Consulting collects, holds, or discloses personal information**

- Aha! Consulting obtains contact information from lists provided by one of our clients to invite the individual to participate in the topic of the engagement
- The client circulates a survey link to the public, which elicits information from individuals
- Data is gathered via an expression of interest process to recruit people onto a panel or reference group of some kind

## Accessing Personal Information

Any individual providing personal information has the right to request that information they have supplied and/or to correct it. After confirming the person requesting that information is the person whose details we have, an individual making such a request to Aha! Consulting would be sent by mail or emailed that information or confirmation by email that their details have been updated or corrected.

## Complaints of a breach by an individual

In the event of a potential or actual data breach being raised by an individual, the project manager or person taking details of the complaint, would immediately inform the Managing Director or other senior staff member. Individuals are always provided with the office number and appropriate email addresses if they have any queries relating to the research we are conducting. Aha! Consulting Manager and General Manager would assess the situation and identify whether the breach meets criteria which triggers notifiable obligations. Examples include:

- Financial Fraud including unauthorised credit card transactions or credit fraud
- Identity theft causing financial loss or emotional and psychological harm
- Family violence
- Physical harm or intimidation

Aha! Consulting would contain the data breach by ensuring there is no further risk of compromising other personal information. This should be done immediately.

All affected individuals would be notified including the Office of Australian Information Commissioner if required as soon as possible when all facts have been gathered.

The incident would be reviewed by cyber security manager and steps taken to prevent further breaches.

## Disclosing information

Aha! Consulting will never disclose any personal information to any third party unless express permission has been obtained from an individual\* or when required by law. Personal information is never disclosed to any overseas recipients under any circumstances.

\*circumstances where personal information may be passed on to a third party would be where the client has requested that a part of the research feedback be reported individually. In this instance Aha! Consulting would always ask the individual and keep record of that permission if they are happy for their data to be passed on with identifying details or if they wish to remain anonymous, that individual's right to remain anonymous is honoured.

## Details for individuals

- Aha! Consulting respects peoples' privacy and all our operations adhere to the Privacy (Market and Social Research) Code 2014.
- We won't pass on any contact details to a third party unless we have express permission. This applies to your name(s), contact phone number(s), address, email address, and other personal information.
- We will never promote, market to you or sell anything or any product.
- The feedback you give is de-identified (your name is not tied to your responses) before it is passed on to our clients.
- If you take part in a workshop or interview that is recorded – but we'll ask your permission for this before the workshop or interview commences.
- We will never question if you do not want to take part in our projects, or if you want to be removed from a list. You are absolutely within your rights to refuse to take part in any of our work and we don't mind if you refuse.
- We will not keep contacting you if you tell us you don't want to take part.

Aha! Consulting (ABN **37 726 615 805**) respects and upholds your rights under the Australian Privacy Principles contained in the Privacy Act 1988 ("Privacy Act"). Aha! Consulting also adheres to the Privacy (Market and Social Research) Code 2014 ("Code").

This Privacy Policy for Aha! Consulting lets you know what personal information of yours we hold, what we do with it, who we will disclose it to and how you can access the personal information we hold about you. You can also find out here how to change inaccurate personal information and how to opt out of receiving communications from us.

## What personal information about you does Aha! Consulting collect and hold...

### ...about the general public

Aha! Consulting have access to a list of phone numbers, similar to an electronic version of the White Pages. We make calls from this list when we are doing a survey of the public. This list may have surnames, street names and numbers and phone numbers. If you choose to participate in a survey in this way, your answers and feedback will not be tied to your contact details (your responses will be deidentified).

### ...about people registered with other organisations...

Sometimes our clients wish to carry out independent research with their customers. In this case we might be provided with a list of names, phone numbers and/or email addresses from which we make contact. Sometimes this list might include some other information such as the type of account that you hold with them (in the case of a survey on behalf of bank) or the type of insurance policy you have (in the case of a survey on behalf of an insurance provider). Again, this information is kept safe and will only be used in connection with the client's survey (we don't keep your details on record and contact you again for other surveys in the future).

## **...about Aha! Consulting Panel Members**

People who have signed up to participate on a panel have provided Aha! Consulting with their name, gender, date of birth, contact details, and other demographic data together with opinions and feedback in relation to projects etc. when you fill out surveys. When providing personal information, you have the option of remaining anonymous or use a pseudonym to be identified by. However, in certain circumstances, such as where we receive your contact details from a third party or where the research data itself may potentially allow for identification, this may not be practicable. If a panel member wishes to have their data deleted they can do so by contacting [admin@ahaconsulting.net.au](mailto:admin@ahaconsulting.net.au)

## **What are the purposes for which Aha! Consulting uses, handles, and discloses your personal information?**

We will only use and disclose your personal information for the purpose of projects outlined above, and hold this data in accordance with this Privacy Policy. We will not use or disclose your personally identifiable information for the purpose of advertising, promotions, or direct marketing activities. If personal data has been collected, will only re-contact you if you were informed of this or we have valid reasons to believe a genuine need to re-contact (eg: data validation or clarification).

## **Who will Aha! Consulting disclose your personal information to?**

Aha! Consulting will not disclose any personally identifiable information we collect from you unless we have your express prior consent.

In the case of interviews and/or surveys, information gathered is de-identified and used in aggregate form to do a thematic analysis and create reports on behalf of the client. Where data is not de-identified, this is disclosed to the participant prior to their participation.

In the case of personal data (name, contact details etc) collected through surveys (eg: contact details so that they receive a report of the outcomes), this information is separated from the other survey data, to maintain client confidentiality.

In the case of personal information collected through interviews (eg: views on the topic of the engagement), the participant is sent the interview notes for endorsement of its accuracy prior to its inclusion in any report.

When Expression of Interest data is collected, this is used to select group membership and not shared beyond the client and Aha! staff for the purpose of communicating with that group member

At the conclusion of the project, work products and reports are returned to the client and if part of the contract, and if agreed by the participants in advance, the raw data is also returned. An electronic copy of the data is kept on file in an encrypted cloud storage system by Aha! Consulting and on a hard drive back up located in Yokine.

## Openness

You have the right to request access to any personal information we hold about you. You can request this information by contacting the Privacy Officer at the details listed below. Where we hold information that you are entitled to access, we will respond to your request in a reasonable time and endeavour to provide you with a suitable range of choices as to how access is provided (eg, emailing or mailing it to you). A fee may be charged to cover the cost of retrieval. However, this fee will not be excessive and will only apply to the facilitation of your request.

If at any time you believe that personal information we hold about you is incorrect, incomplete, or inaccurate, then you may request amendment of it and we will either amend the information or make a record of your comment, as we think appropriate.

## Questions and complaints

If you have any questions about this Privacy Policy or believe that we have at any time failed to keep one of our commitments to you to handle your personal information in the manner required by the Privacy Act, the APPs or the Code, then we ask that you contact us immediately using the following contact details:

Operations Manager/Privacy Officer  
Nicole Sjardin  
Aha! Consulting  
PO Box 2031 Yokine South 6060  
nicole@ahaconsulting.net.au  
T. 08 9443 9474.  
www.ahaconsulting.net.au

We will respond and advise whether we agree with your complaint or not. If we do not agree, we will provide reasons. If we do agree, we will advise what (if any) action we consider it appropriate to take in response. If you are still not satisfied after having contacted us and given us a reasonable time to respond, then we suggest that you contact the Office of the Australian Information Commissioner by:

Phone: 1300 363 992 (local call cost but calls from mobile and pay phones may incur higher charges). If calling from overseas (including Norfolk Island): +61 2 9284 9749

TTY: 1800 620 241 (this number is dedicated to the hearing impaired only, no voice calls)

TIS: Translating and Interpreting Service: 131 450 (If you don't speak English or English is your second language and you need assistance and ask for the Office of the Australian Information Commissioner)

Post: GPO Box 2999 Canberra ACT 2601 Fax: +61 2 9284 9666

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

The website [www.ahaconsulting.net.au](http://www.ahaconsulting.net.au) is owned and managed by Aha! Consulting.

Cookies may be used on our survey forms to make sure members don't do the same survey twice. No personal identifying information is stored on any cookie nor do we retain any cookie information on our databases.

## **Data Held On-site**

Aha! Consulting's' data is backed up daily to an external hard drive , located offsite in Yokine.

Aha! Consulting does not use any third-party back-up.

All workstations run up-to-date antivirus and all incoming emails are filtered through the office 365 spam protection.

## **Data Held Off-site**

Aha! Consulting uses an external hard drive, Dropbox and Survey Monkey as offsite data storage.

All cloud and survey accounts are secured using multi-factor authentication.

## **Retention and destruction of Personal Information**

Aha! Consulting will destroy or de-identify your personal information as soon as practicable once it is no longer needed for the purpose of our research. However, we may in certain circumstances be required by law to retain your personal information after our research has been completed. In this case your personal information will continue to be protected in accordance with this Policy. If we destroy personal information, we will do so by taking reasonable steps and using up-to-date techniques and processes.

The information or feedback that you provide will be used solely for research purposes. Information that identifies you personally will be removed before data is passed on. It is your right as a respondent to access the information you have provided to us and/or have this destroyed, however this will not be possible once the data has been deidentified.

## Security of Information

Aha! Consulting will take reasonable steps to protect your personally identifiable information as you transmit your information from your computer to our website and to protect such information from loss, misuse, and unauthorised access, use, modification, disclosure, alteration, or destruction. However, you should keep in mind that the transmission of information over the Internet is not completely secure or error-free. In particular, e-mail sent to or from this website may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail.

## Miscellaneous

In this policy "personal information" has the same meaning as under the Privacy Act. This policy is effective from 12 March 2020. We may change this policy from time to time. Although we intend to observe this Privacy Policy at all times, it is not legally binding on Aha! Consulting in any way. From time to time we may regard it as necessary or desirable to act outside the policy. Aha! Consulting may do so, subject only to any other applicable contractual rights you have and any statutory rights you have under the Privacy Act or other applicable legislation.

Joel Levin, Managing Director